

Hertfordshire County Council

Exceptional Needs Funding

Independent Review – Full Report

March 2016

“The independent review of Exceptional Needs Funding has been completed and the final full report and the executive summary are now published. Three feedback sessions were held on 3rd and 4th May with representatives from schools, PVI settings, parents, officers and support services. These sessions were primarily for those who had met Peter Gray, the reviewer, during the process of the review. Some representatives from the Area DSPL Groups also attended. Peter presented a summary of the findings and recommendations and there was an opportunity for discussion and questions. The ideas, suggestions and comments from these sessions will be fed into the working group. Further information and updates about the progress and proposals will be available on this site as the work develops” – Debbie Orton (Head of Integrated Services for Learning



Strategic Services for Children and Young People

**EXTERNAL REVIEW OF HERTFORDSHIRE'S FUNDING APPROACH FOR CHILDREN WITH SEN AND
DISABILITIES IN MAINSTREAM SCHOOLS AND SETTINGS**

Peter Gray

19th February 2016

INTRODUCTION:

- 1.1** Hertfordshire's current approach to funding children and young people with SEND in mainstream schools and settings was developed following an external review of practice in 2005. The system at that stage involved allocation of additional funding to children with statements (as part of the statutory assessment process), along with a broader range of allocations to individuals with lower level needs through a range of EPF (earmarked pupil funding) panels.
- 1.2** The review highlighted a number of issues (amount of time spent considering applications for relatively small amounts of money; bureaucracy; equity; financial sustainability). On the basis of the review, it was decided that a significant amount of the available funding should be delegated through a formula, based on a combination of indicators (prior attainment, social disadvantage, number on roll). This would allow schools to develop their capacity to meet 'predictable' needs on a longer-term basis. A proportion of funding would be retained to meet the needs of a much smaller number of pupils, which would be regarded as significant and complex ('exceptional') if they occurred in any mainstream school. Identification of exceptional needs would be achieved through a two stage moderation process (school cluster, then District), with active involvement of mainstream Head Teachers and SENCos. This resource allocation system was intended to be independent of the statutory assessment process.
- 1.3** The new system was introduced in 2007 following broad consultation with schools and other stakeholders. An early independent evaluation was carried out in 2008 by John Moore. The review identified considerable strengths in the new approach but also some areas for further development.
- 1.4** A further independent review has been commissioned for the following reasons:
- 1) The Government's national funding reforms have meant that Local Authorities are expected to provide additional funding to mainstream on a 'top-up only' basis. This is making it more difficult nationally for some schools/settings to meet exceptional needs.
 - 2) There have been continuing questions about the consistency of decision-making by the County's ENF (Exceptional Needs Funding) panels (across different DSPL Areas, and different periods of time). LAs now also have responsibilities for children and young people with SEND from 0-25 and it is important to ensure comparability of funding across different age phases, as well as the range of types of need.
 - 3) There have been a number of staff changes at senior level in schools and settings since the system was first introduced and some recently appointed managers are less familiar with the origins of the current Hertfordshire approach and its rationale.

- 4) With the new national SEND reforms, there is an expectation that decisions will be more personalised, with more active involvement of parents/carers and young people in determining the resources they require and how these will be used. Some parents currently feel excluded from the decision-making system and unsure how they can influence outcomes.
- 5) Increased budget pressures on Local Authorities and schools mean that it is more important than ever to ensure that SEND funding is used effectively and is ‘value for money’. Issues have been raised about the use of additional funding (and delegated SEND budgets) in some schools, the effectiveness of current monitoring/review arrangements, and whether there is clear enough evidence to demonstrate positive outcomes.
- 6) Numbers of pupils allocated ENF have risen significantly over recent years. This may be due to real increases in numbers of children with significant and complex needs. However, demand for additional funding may have risen for other reasons. It is important to understand trends more fully to inform budget decisions at County and local DSPL area level.
- 7) There has been some historical variation in ENF spend between DSPL Areas (even with adjustments made for size of area). Although some adjustments have been made to ensure greater equity, there may be a need to look again at budget distribution, to ensure a ‘level playing field’

1. FOCUS OF THE CURRENT REVIEW:

2.1 All systems for additional funding have their strengths and issues. It is therefore important for all stakeholders to be clear about what they want their local system to achieve. The principles on which the current Hertfordshire approach is based were as follows:

- (i) The need for greater *clarity* about the range of needs that all schools should cater for themselves, without requiring additional funding
- (ii) The need for a system that targets additional resources on those pupils who are *most in need*, and that is less susceptible to individual school/parent pressure
- (iii) The need for *equity* so that resourcing decisions are similar wherever children happen to live/go to school
- (iv) The need for *transparency*: all relevant stakeholders need to understand the system and be clear about its rationale
- (v) The need for *practitioner involvement* in decisions, so that judgements can be made for sound educational reasons
- (vi) Opportunities for *peer support and challenge*, to support equity in decisions, reinforce school responsibilities, and help share good practice
- (vii) *Limited bureaucracy*: information demands should be kept to the minimum needed for good decisions to be made
- (viii) Avoidance of *perverse incentives*: so that schools/parents do not feel they need to accentuate deficits to access the resources their children require
- (ix) The need for a system that supports *good practice and positive outcomes*

- (x) *Choice and flexibility* at school level about how children's needs may best be met from the funding available

2.2 In evaluating the current system (and any alternative options), it has been important to gain perspectives from key stakeholders (schools and parents/carers) on how far these principles still apply, and ideas about additional criteria against which systems should be judged. These have provided a clearer framework for guiding the review activity.

2.3 The review has sought to address the following questions:

- 1) How does the system work in practice and how far does it match its design principles?
- 2) What are the strengths of the current system and what needs to be maintained?
- 3) What are the key issues, from the perspectives of the different stakeholders (schools/settings; parents/carers; LA officers and support services)?
- 4) What are the options for improvement (within the existing system; alternative approaches used in other Authorities)?
- 5) What is the best way forward?

2. METHODOLOGY:

3.1 The review included the following activities:

Stage 1: Agreement on principles and evaluation criteria (county level):

Interview with Head Teacher representatives (from Schools Forum and other relevant groupings): (one secondary; 4 primary)

Interview with parent/carer representatives (HPCI) (4)

Interview with lead LA officers and ENF steering group

Stage 2: Review of ENF system (county level):

Group interview with chairs of Area ENF groups

Group interviews with primary and secondary Head Teachers (27 in total)

Group interview with managers of PVI settings (12 from different areas)

Group interviews with primary and secondary SENCOs (17 from different areas of the county)

Individual interviews with SEN support service managers (EPS; Early Years Advisory Team; Communication and Autism Team; Physical and Sensory Team; Behaviour Support (DSPL manager + Head of ESC from Area 3))

Individual interview with ENF administrative lead

Data analysis: Number of cases presented/agreed/refused

Type of cases presented/agreed/refused

Age profile of cases presented/agreed/refused

More detailed sampling of three contrasting Areas (selected on basis of data and reported differences in practice): Broxbourne, Hertsmere and St Albans: consisting of:

- ENF Panel observations
- Follow-up discussions with Area ENF group members
- Interviews with local Head Teachers/school managers (12)
- Phone interviews with parents/carers (cases agreed/refused¹)

Stage 3: Appraisal of future options:

Survey of processes used in other similar LAs
Appraisal of relative positives/issues (against evaluation criteria agreed)

Stage 4: Interim analysis, feedback and discussion with schools, officers and parents groups (ENF conference and HPCI group)

Stage 5: Final analysis and write-up

3. THE CURRENT SYSTEM AND DEVELOPMENTS OVER TIME:

4.1 When the new system of mainstream funding was introduced, there was a considerable amount of consultation with schools and parents, as well as active involvement of Head Teachers and SENCOs in the development of the ENF (Exceptional Needs Funding) process. There were a number of opportunities for practice moderation to enable a more consistent understanding of 'exceptionality' to be achieved.

4.2 There was broad understanding that the new process was accompanied by a significant increase in schools' delegated budgets, with a further £1.7 million being distributed to shelter schools from any losses that might have otherwise occurred through the introduction of a formula approach. This provided schools with an enhanced and more sustained capacity to meet a broader range of 'predictable' needs.

4.3 The process for ENF application has changed little since the original design. Schools are expected to bring cases initially to local cluster groups for discussion and only those felt by the cluster to have exceptional needs are put forward for consideration by Area Panel. Each cluster sends a representative to the Panel where decisions are made as to whether needs are exceptional across the Area as a whole. All schools receive additional funding to participate in the process.

¹ 30 cases were identified across the 3 sample areas. 11 parents/carers agreed to be contacted and 9 were available for interview (6 where ENF allocated; 3 where not agreed; 4 early years, 4 primary and one secondary).

- 4.4** Notification of decisions is given formally in writing to schools/settings by the Panel, with cluster reps having the opportunity to debrief colleagues as requested about why particular judgements were made.
- 4.5** Cluster groups are encouraged to invite support service practitioners to their meetings to provide further context and information on children's needs. Most support teams are represented at the Area Panels, typically by a local service manager. The Panel meetings are chaired by one of the Authority's SEN officers and there is a county ENF administrator (funded through Schools Forum) who collates the necessary paperwork and background data.
- 4.6** The process is described in a SEN Mainstream Funding Handbook, which sets out the expected roles and responsibilities of cluster group and Area Panel members and provides further information to assist with decision-making. This has recently been updated to include guidance on judging exceptionality in relation to specific areas of need.
- 4.7** The Handbook is well-organised and clearly written. There are also accessible information leaflets for parents and other agencies which provide a simple account of Hertfordshire's funding system and its rationale.
- 4.8** The ENF application form has been modified over time and now requires schools/settings to provide clear information on the nature of the child's difficulties, the interventions required and the specific support for which additional funding is being requested.
- 4.9** There is encouragement for Panels to consider longer term allocations to ensure continuity of support within and across key stages. However there is also flexibility to allocate for shorter periods to support dynamic intervention or where there is a need for more active review. Panels also have a facility to backdate funding where they feel this is merited (and where sufficient budget is available).
- 4.10** Since the system was first introduced, there have been the following significant changes:
- i) The inclusion of early years settings (private, voluntary and independent (PVI)) in the process, with involvement at both cluster and Area level²
 - ii) The facility to make allocations for 'clusters of need' (for groups of children in specific mainstream schools, where there were particular issues)³
 - iii) The move to 'top-up only' allocations, in line with national SEN funding requirements, with schools expected to find the first £6k (13 hours LSA equivalent) for any child considered to have exceptional needs
 - iv) The development of the 'multiple cases' approach, which seeks to avoid inclusive schools being penalised by the top-up only model (as they have to

² Previously, decisions about additional funding in PVI settings were made at County level and relied heavily on the advice of the Early Years specialist advisory team.

³ In practice, these are no longer made. Given budget pressures, Schools Forum decided that priority should go to individual pupils with exceptional needs

find an unreasonable level of funding from their delegated budget to meet their expected contribution to provision). The multiple cases approach provides full allocations to schools for every ENF pupil that is over and above a defined threshold (linked to school size).

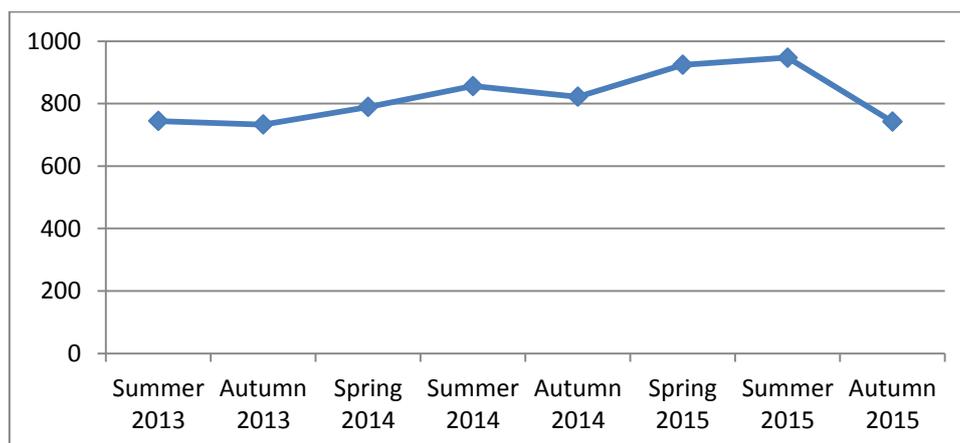
- v) The expectation that allocations of full-time support to early years settings will be converted automatically to full-time support when children start school. This is intended to support transition and provide a clearer pathway for parents at a critical transfer stage.

Data and trends:

- 4.11** The original estimate of the numbers of Hertfordshire children who would require Exceptional Needs funding was around 600. This was based on the number of children in schools who were receiving higher levels of funding in the old system. Although numbers of requests initially exceeded this number, allocations were broadly in line with estimates.

- 4.12** Numbers of children receiving ENF have significantly increased in recent years, to a peak of 947 in summer term 2015 (see Figure 1 below). This can only partly be explained by the extension of ENF to early years (PVI) settings. Some of those interviewed considered that the increase simply reflected greater numbers of children with higher level needs in the mainstream sector. Others questioned whether there were other influences (such as changes in professional/parental expectations and/or the impact of the new national SEND funding requirements).

Figure 1: Total number of children receiving ENF funding (2013-2015):



4.13 Comparisons between summer term numbers between 2013 and 2015 show that growth during this period was higher in some DSPL areas than others, with Dacorum and St Albans showing greater levels of stability (see Figure 2 below), and with more noticeable change in the school age sector (see Figure 3).

Figure 2: Numbers of children receiving ENF by DSPL area (2013-2015)

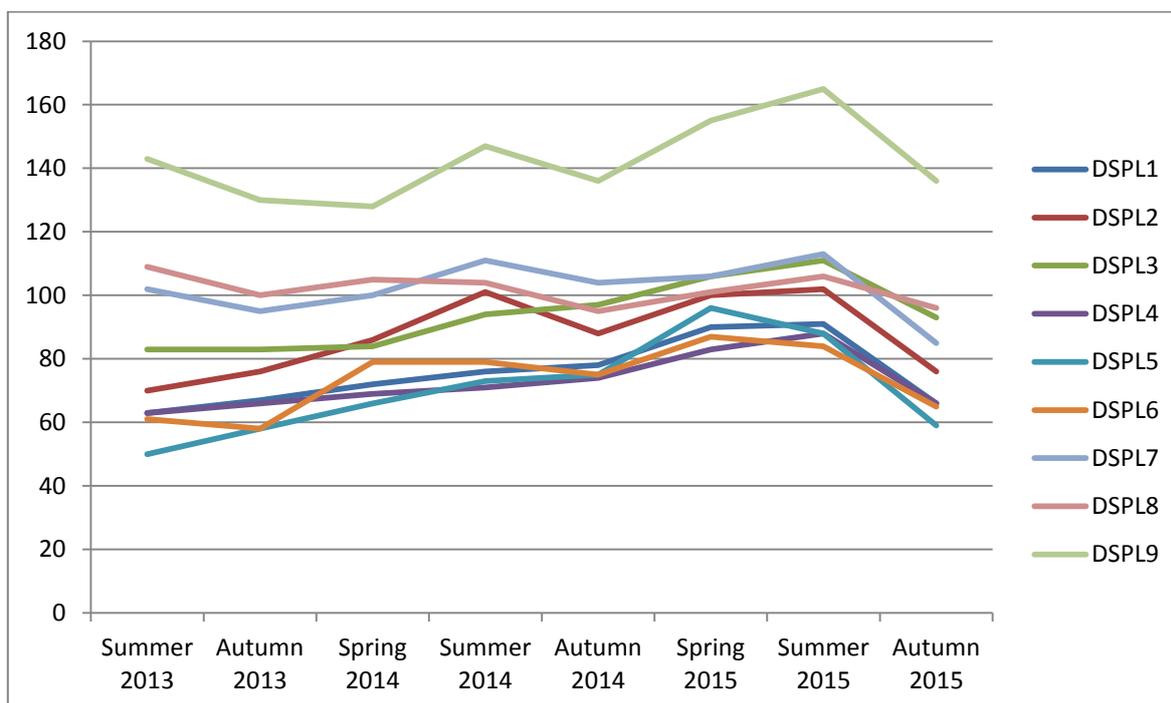
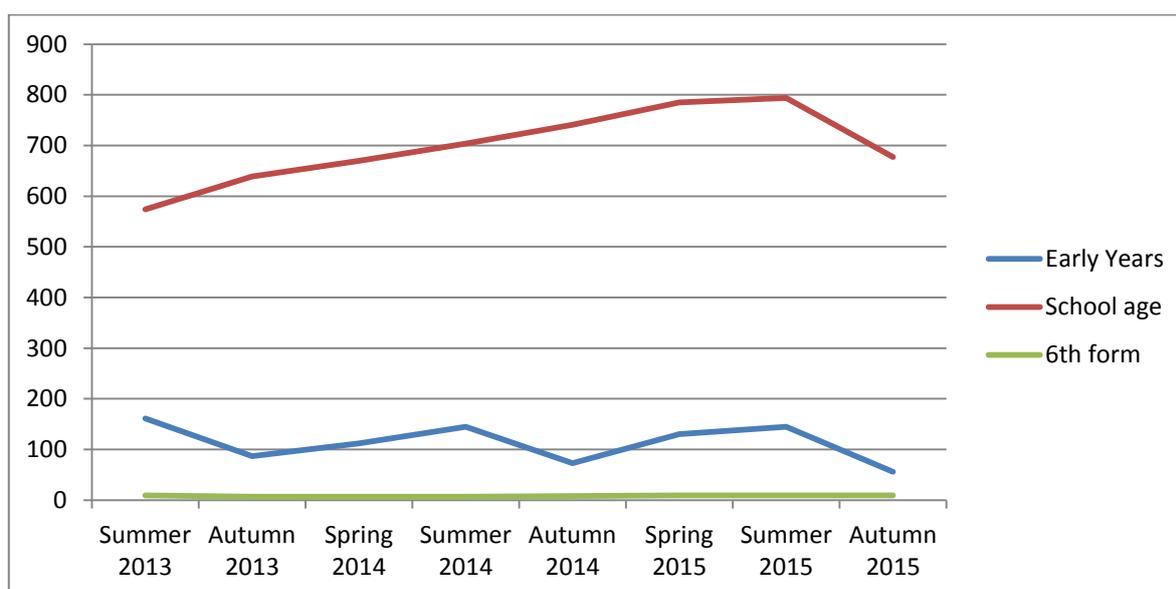


Figure 3: Numbers of children receiving ENF by age phase (2013-2015)



4.14 The percentage of cases put forward by clusters that were agreed by Area Panels had always been quite high (80% in 2013/14, with some variation between Areas). However percentages rose in 2014/15 (87.5% and 88.6% respectively for applications submitted in Autumn 2014 and Spring 2015). With a finite overall budget for ENF, this created significant challenges for the summer term 2015 Panel meetings as a significant proportion of the funding available for the financial year was already committed. Agreement rates for this period dropped to 82% overall (and to below 80% in some areas). Numbers of children receiving ENF in Autumn Term 2015 dropped to 742 compared to 822 at the same period in the previous year. Total numbers at January 2016 were 734 (with further cases likely to be agreed at the Spring Term 2016 Panel cycles).

4.15 Table 1 shows the number of ENF applications for children with different types of need that were agreed in 2013/14 and the position at January 2016. The most common allocations continue to be for **autistic spectrum disorders (ASD)** and **behavioural, emotional and social difficulties (BESD⁴)**. Currently, the next highest allocations are for 'learning difficulties' (108), speech, language and communication difficulties (102), physical disability (80) and visual impairment (61).

⁴ Now SEMH (social, emotional and mental health difficulties)

Table 1: ENF allocations by type of need: 2013/14 and January 2016

	Successful ENF applications during 2013/2014	Children receiving ENF as at January 2016
ASD	133	151
BESD	134	125
Speech/language/communication	56	102
Hearing Impairment	8	15
Visual Impairment	20	61
Multi-sensory impairment	1	1
Physical disability/PNI	37	80
Learning difficulties	73	108
Severe learning difficulties	11	27
Profound/multiple LD	2	14
Specific learning difficulties	6	6
Unknown/Not available	1	1

- 4.16** There are some differences in spend profiles (allocations to types of need/ages) across the different Areas, but these are difficult to interpret because of the relatively low numbers of children involved.
- 4.17** The majority of ENF allocations are to children in primary schools (534 in Autumn Term 2015 vs 143 in secondary and 56 in Early Years settings (PVI and maintained)).
- 4.18** In Summer Term 2015, numbers in individual primary schools ranged from 0 to 11⁵. Table 2 below shows the overall picture.

Table 2: Numbers of pupils with ENF in individual primary schools

	Summer 2015	Autumn 2015
Schools with no ENF pupils	128	147
Schools with 1 ENF pupil	103	99
Schools with 2 ENF pupils	76	81
Schools with 3 ENF pupils	46	42
Schools with 4 ENF pupils	26	17
Schools with 5 or more	23	16

- 4.19** In Summer Term 15, numbers in individual secondary schools also ranged from 0-11, with 9 schools having 5 or more pupils with ENF, and 44 having one or less.
- 4.20** Allocations also vary across clusters. In Spring Term 2015, the highest number of requests per cluster was 22 (21 agreed) and the lowest was 0. In Summer Term 2015, numbers of requests varied from 0 to 17 (15 agreed).
- 4.21** The introduction of multiple cases funding in 2013/14 was intended to target schools that were particularly inclusive (and at risk of being penalised financially as a result). This was in

⁵ currently highest number is 9

line with national expectations. However, with the relatively low thresholds for identifying multiple case schools, numbers qualifying for this funding are high (176 out of 402 primary schools in summer term 2015 (now 152); 22 out of 84 secondary schools (now 18)).

Budget and spend:

- 4.22** The current budget for ENF is nearly £5.4 million. This has remained fixed with small increases for inflation⁶. Initial budget allocations to DSPL Areas were based on historical spend but these have been progressively adjusted to take account of expected shares (based on the DSPL model indicator that consists of a number of formula factors)⁷.
- 4.23** The ENF budget has remained stable despite the move towards ‘top-up only’ allocations. Additional funding (£3 million) from savings in the independent/non-maintained special school budget was used to support schools in making their financial contribution. Initially this enabled allocations to be made to a higher number of children. The impact of this change is clear from the 2013/14 and 2014/15 data presented in Figure 1 (above).
- 4.24** However, additional budget pressures arose following the introduction of multiple case funding. No additional money was put into the budget at this point. Funding is top sliced to take account of existing multiple cases before Panels meet and their budgets are reduced accordingly. The top slice is calculated on a county-wide basis and adjustments to Area budgets are not specifically linked to multiple case expenditure in their locality.
- 4.25** Table 3 shows spend on multiple cases by DSPL area. The effect of the county wide top slice approach is that some areas are losing funding to others where numbers of multiple cases are higher.

⁶ Account needs to be taken of the increase in rate of pay for Learning Support Assistants. The financial expectation of schools set by the DFE (£6k) has not been changed which also puts greater pressure on top-up/ENF costs.

⁷ Historically St Albans was a higher than expected spender. Spend is not more in line with expected share.

Table 3: Analysis of Multiple Cases Expenditure 2015-16 by DSPL Area

DSPL Area	MC £	% of total MC Spend	Model Indicator %	Difference
1	127,000	6.0%	10.0%	-4.0%
2	208,000	9.9%	11.5%	-1.6%
3	300,000	14.3%	10.5%	+3.8%
4	186,000	8.8%	9.1%	-0.2%
5	138,000	6.6%	9.6%	-3.0%
6	166,000	7.9%	6.6%	+1.3%
7	258,000	12.3%	11.7%	+0.6%
8	248,000	11.8%	13.4%	-1.6%
9	474,000	22.5%	17.8%	+4.8%
SUM	2,105,000			

4.26 The overall top slice for multiple cases in 2014/15 was £1.7 million but spend exceeded this (£2.2m). In 2015/16, the top slice has been increased to £1.9m (with spend currently forecast at £2.1m). This is more than a third of the overall ENF budget. The increase in the proportion of funding spent on multiple cases has reduced the amount of funding available to Area Panels to spend on new children coming into the system.

Summer 2015: particular challenges

4.27 Many of those interviewed pointed to the summer 2015 decision cycle as being particularly problematic, with Area Panels forced to prioritise children for funding in order to stay within budget, and in some cases, agreeing that they had exceptional needs but having no money to fund these. There appear to have been a number of reasons for this:

- i) Mainstream schools and settings report ongoing increases in the numbers of children with high needs and in the complexity of their difficulties
- ii) The move to a top-up only system raised expectations that a higher number of children could now be funded within the available ENF budget⁸
- iii) A higher number of cases were agreed in Spring Term 2015 which committed a significant proportion of the annual Area Panel budget
- iv) Less funding was available to spend than anticipated because money had been top sliced for multiple cases
- v) Expectations remained high at school/cluster level in summer 2015 but could not be met within tighter budgets
- vi) Other concurrent changes (such as the automatic extension of full-time support from early years to school settings (15 to 25 hours LSA)) placed additional funding constrictions on Panel decisions

4. EVALUATION:

⁸ There is anecdotal evidence that some Panels also increased allocations for children getting 13 hours LSA or below, in order that some level of top up could continue to be provided

- 5.1** There is no doubt that the Summer Term 2015 experience led to a considerable loss of confidence in the ENF system, across the range of stakeholders. Schools/settings started to wonder whether the work required to submit applications was worthwhile, given past experience of rejections. Parents/carers questioned whether the system was compromising their children's statutory entitlements. Cluster representatives began to experience an increasing conflict between their cluster and area identities. SEN officers found themselves caught up in two parallel decision-making systems (ENF and statutory assessment), with the potential for duplication and confusion of roles.
- 5.2** Experience since then has been less difficult but strong themes and memories remain. And there are some continuing issues within the existing system that need to be resolved to avoid repetition of earlier problems.
- 5.3** On balance, most Heads and SENCos interviewed in this review felt that there were sufficient positives in the current system for it to be maintained, with issues addressed. Parent representatives on the HPCI county group wanted more significant change. The views of Local Authority support services and officers were more mixed.
- 5.4** All agreed that the principles underpinning the design of Hertfordshire's current approach were still appropriate and relevant. However, developments in practice were needed to ensure that it matched these principles. There was also a need for stronger reference to/engagement with parents/carers, in line with the directions of the national SEND reforms. While the overriding priority was to ensure positive outcomes for children, there was also a need to take account of the current budgetary context, in which funding for education is increasingly constrained.

POSITIVES:

- 5.5** A number of those involved in the funding system from the start (schools, services and officers) reported that this had been a major improvement on the previous approach. They felt that the system had supported a major shift in culture, with schools and settings being more involved in decisions.
- 5.6** Although there were still some concerns about consistency, the system was regarded as more transparent, with the potential for greater equity than the traditional 'statutory assessment led' model, which was more amenable to individual school/parent pressure.
- 5.7** The system was seen as collaborative with schools/settings, services and officers working together to make difficult decisions, rather than displacing responsibility and attributing blame. There were considerable benefits from including practitioner views.
- 5.8** Local clusters (which had not existed in any systematic way before the ENF system was developed) were seen as a major vehicle for peer challenge and support, with support services also able to play a useful role in facilitating good practice. SENCos coming from

other LAs with less durable networks reported that they found cluster arrangements particularly valuable.

- 5.9** There was a general view that the system had enabled participants to have a broader perspective on issues and local provision and that this had the potential for helping plan local developments⁹.
- 5.10** Schools had appreciated the Authority's move to greater delegation of funding, which had enabled them to increase their capacity to meet a broader range of needs.
- 5.11** The inclusion of early years settings (both PVI and maintained) in the ENF system had provided a vehicle through which needs could be considered across both preschool and school age phases. Most of those interviewed saw cross-phase working as a positive feature that supported transition and proactive planning. The ability to access funding without statements or EHC Plans also facilitated early intervention. Settings that received ENF were positive about the levels of allocation and the capacity for funding to be backdated.
- 5.12** Observation of Panel meetings in the three sample areas indicated that these were professional in character, with careful consideration given to each application. The cycle of Panel meetings across the county was very well administered, with provision of key financial information, statistics and pupil data. Considerable effort is taken, through the county Exceptional Needs Business and Advisory Groups, to monitor the system and consider any emerging issues. The system is overseen by a mainstream primary school Head, who is a member of Hertfordshire's Schools Forum and is actively involved in the Authority's DSPL developments and SEND strategy.

ISSUES:

Consistency of decisions:

- 5.13** This was the biggest issue raised by a range of stakeholders. Concerns related to:
- i) *Consistency across Areas:* are similar decisions being made by Panels in different parts of the county? Is access to ENF funding dependent on where children live?
 - ii) *Consistency across age-phases:* are similar criteria being applied to children in the early years (PVI settings) as in the school sector? Or are they less favourably treated given that PVI settings have only latterly been included in the system and there are fewer representatives from this phase at cluster level?

⁹ In line with Hertfordshire's DSPL (Delivering Special Provision Locally) approach

- iii) *Consistency across time:* are children now being refused ENF who would have been allocated it in previous years? Are criteria getting progressively tighter? And is this affecting children's longer-time entitlement to support?
- iv) *Consistency across decision-makers:* does ENF depend on who is involved in the Area panels? Or whether children are from their particular setting/school? Are some people more generous or hard? What is the level of advocacy presented by panel representatives (including support services) and how far does this have an impact on decisions?
- v) *Consistency across types of need:* are some types of need getting more favourable treatment (eg physical/sensory difficulties vs others such as ASD or behaviour which are more difficult to assess and define)? Why is there no representation from behaviour support services when there is support service involvement for other areas of need?
- vi) *Consistency between ENF decisions and criteria for specialist placements:* how can some children be regarded as 'not exceptional' and yet go on to be placed in specialist provision (costing considerably more than an ENF top-up allocation)?

5.14 These concerns have become more acute as part of the reaction to the cycle of decisions in Summer Term 2015, with some loss of confidence in a system that is dependent on the development of collective understanding and judgement. It is difficult to distinguish belief from reality in the absence of a detailed analysis of individual decisions.

5.15 However some evidence can be presented for each of these areas:

Area:

Budget distribution between Areas is now more closely linked to the DSPL model indicator. If this indicator is an accurate measure for exceptional need, then Areas have less ability to be more/less generous. There may be differences in the priority given within the budget available to different types of need/age phases, but these are difficult to determine given the small number of cases involved. Some of those interviewed argued that Area flexibility could be influenced by levels of usage of specialist provision (fewer children in special schools/units might mean more children with exceptional needs in the mainstream sector), and there is clearly a need to look at this issue.

Age phase:

The number of children receiving ENF in the Early Years in Summer Term 2015 (across both PVI and maintained nurseries) was 145 compared to 793 in the primary and secondary school phase (ie 15% of the total vs 84% for school age). Numbers in Autumn Term 2015 dropped to 56 and 677 respectively. This is a lower than expected proportion given the number of year groups included. However, the main reason for the difference appears to be

that numbers of children receiving ENF at school age have risen significantly over time whereas early years/nursery allocations have remained static¹⁰.

Time:

Evidence for this tends to be anecdotal, with experienced SENCOs perceiving a gradual change in thresholds for allocation since the system was introduced. Officers and support team managers also report a reduced capacity for dynamic allocations or funding for 'clusters of need', as a result of pressure to meet the needs of a greater number of individual cases. The shift appeared to be particularly dramatic in the summer term 2015 decision cycle. One of the HPCI group reported that some parents had found that allocations had been reduced or ceased with no clear change in their children's needs.

Decision-makers:

The order in which cases are presented at the Area Panels makes it difficult to assess how far cluster representatives are 'arguing the case' for children in their own school or cluster. Analysis of school allocations indicates that a relatively high proportion (29%) of cluster rep schools are in the 'top 10 ENF receivers' for their DSPL area. However, this figure varies significantly between Areas. It may also reflect a higher commitment on the part of cluster reps to SEND (and a greater commitment to inclusion), rather than advocacy or bias. Observation of panels and interviews with support service representatives indicated a degree of uncertainty about how far their role should be informational or include an opinion about the relative significance of individual children's needs (from casework knowledge/experience).

¹⁰ Clearly early years provision is not statutory and some parents of children with significant SEND may choose to keep them at home. However, the extension of the early years offer to vulnerable 2 year olds should mean an increase in numbers of children receiving ENF at this stage. It is also the case that there is a limited range of specialist provision in the early years phase, so a greater proportion of children with complex disabilities are likely to be included in mainstream settings.

Types of need:

A number of those interviewed felt that it was more difficult to get ENF for children with ASD or behaviour difficulties as these were regarded as 'high incidence needs' (and therefore not exceptional). Physical and sensory difficulties were seen as 'going through with less challenge'. The data provided in Table 1 above show that ASD, BESD, SLCN (speech, language and communication) and learning difficulties are the most common types of needs in receipt of ENF. All of these could be described as 'high incidence', with judgements needing to be made about level of significance and severity. Panel observations did however suggest that physical/sensory difficulties can be seen as exceptional as they are low incidence and long-term. There may need, in some cases, to be closer consideration of the *educational* significance of such needs and the importance of children moving towards greater levels of independence and resilience over time.

Mainstream vs special schools:

It is difficult to establish from the available data how many children were refused ENF and were then placed in specialist provision. However, such cases were reported in interviews with both parents and schools. The suggestion in the Authority's SEN Mainstream Funding Handbook that 'some pupils in special schools or other specialist provision do not have exceptional or complex needs' (4.1) raises the question of whether thresholds for ENF and special school admission are sufficiently aligned. Special school placement may also have greater financial costs than providing a (relatively modest) amount of additional funding through the ENF system.

Budget sufficiency:

- 5.16** A number of Heads and SENCos interviewed were positive about the funding system but felt that there was insufficient money in the ENF budget to meet the increasing number and complexity of needs in mainstream schools and settings. They pointed to the fact that budgets had not been increased to take into account parental preference for mainstream inclusion for children with physical/sensory needs, and growth in the incidence of ASD and behaviour difficulties. Early years providers argued that no account had been taken of increases in numbers brought about by the extension of educational opportunity to vulnerable two year olds.
- 5.17** On the other hand, some pointed to the increase in budget capacity brought about by the move to a 'top-up only' system¹¹, and the constraining influence of other changes such as the funding of multiple cases (see paras 4.22-4.26 above).
- 5.18** There was also recognition that, as schools/settings became increasingly able to meet a broader range of needs, the meaning of 'exceptionality' might shift to focus more specifically on children with more complex and significant difficulties.

¹¹ Along with transfer of a further £3m to mainstream school budgets to support this change

Match with national SEND reforms and expectations:

Funding approach

- 5.19** Hertfordshire's approach was based on the principle of passing the maximum level of SEND funding on to mainstream providers so that they could meet the majority of needs themselves. The consequence of this was that thresholds for accessing additional resources were elevated to a higher level than in many other Local Authorities¹².
- 5.20** The national move to a 'top-up only' approach presented two challenges to the system: firstly, schools had to make a significant contribution to provision for children with exceptional needs, when Hertfordshire's expectation had been that delegated funding was to cover provision for schools' 'predictable needs'. Secondly, the DFE's definition of 'high needs' (based financially on children receiving funding up to £10k¹³) was broader than the population that Hertfordshire considered to be 'exceptional'.
- 5.21** Hertfordshire has sought to accommodate these changes in a number of ways. However, the higher level of delegation does imply that, for those children with high needs that are not seen as exceptional, schools should be expected to meet these themselves. An EHC plan might therefore specify that a school provides a higher level of support than the national benchmark of £6k + AWPU might imply.
- 5.22** In some other higher-delegating Authorities, this is more explicit. So, in devolving more funding, they have increased the expected threshold for top-up to 20 hours LSA (learning support assistant) equivalent. Schools then have to find funding not just for children needing support up to this level, but also the first 20 hours for any child requiring a higher allocation¹⁴.
- 5.23** The DFE's expectation is that top-up funding comes from the Authority's High Needs Block. On this basis, Authorities that have increased mainstream funding (and expectations) beyond the national threshold have tended to do this through a process of devolution (this allows Local Authorities to retain some level of purchase on funding and ensure that it is used for the purpose intended). Hertfordshire has tended to delegate rather than devolve, which gives schools greater autonomy over how money is used. In a context of increasing budget pressures on schools, this potentially makes funding for SEND more vulnerable.
- 5.24** The Authority's ability to realign funding so that it is more explicitly focused on High Needs may be limited by the ways in which funding for schools and local areas is constructed in future by national government. However, it will be important to ensure that expectations are clear and that there are appropriate mechanisms for ensuring that both schools and the Authority are able to meet their relative responsibilities.

¹² This was in line with a developing trend in the new millennium

¹³ £6k + basic pupil element (AWPU)

¹⁴ In Oxfordshire, funding has been fully delegated to secondary schools who have to meet the full costs of any allocation.

5.25 The Authority's approach to funding inclusive schools is out of kilter with national expectations (which see this mechanism as targeting a few institutions that have a particularly large number of children with high/exceptional needs). With nearly half of primary schools currently qualifying and a significant impact on available budgets, this approach will need to be reviewed.

Entitlement

5.26 This was a particular issue raised by some parents (both in the county group and phone sample), who were concerned that additional funding was not guaranteed and had to be re-applied for (with the chance that it could be refused). Funding insecurity was leading some parents (and schools/settings) to request statutory assessment, with the belief that this would provide stronger safeguards and longer-term entitlement.

5.27 The Mainstream SEN Funding Handbook recommends that longer-term allocations are made (for the full key stage) for children whose needs are clearly likely to go on being exceptional. While this clearly happens for some types of need (eg physical), shorter-term allocations are tending to be made for children with ASD and/or behaviour concerns, partly because it is more difficult to predict how things will go, and partly to help ensure a greater focus and level of accountability about how the funding is used. Shorter-term allocations also appear to be used in some cases where the nature and level of needs are uncertain.

5.28 Some of those interviewed argued that there were benefits in more active planning for children with complex SEND: that longer-term allocations could drift and have insufficient focus on promoting independence and resilience (particularly when the main expected intervention is LSA support¹⁵). This was an issue that some parents in the phone sample had experienced.

5.29 A crucial issue may be how 'entitlement' is expressed. Some parents interviewed felt that this could only really be achieved by statutory means through formal individual assessment. Others argued that this could lead to inequity and inflexibility, and did not necessarily guarantee good quality provision or positive outcomes. However, in a more devolved/delegated system, there may need to be a greater level of monitoring and follow-up to help ensure that children's needs are being met and resources are being used effectively.

5.30 The issue for parents is most acute in cases where schools/settings had indicated that they would not be able to meet children's needs without additional support. This could result in a delay in admission to early years settings as the ENF process was put into place. It also led to a loss of confidence when an ENF allocation was not made. On the other hand, some schools/settings presented ENF applications in a different way, indicating their view that

¹⁵ Recent studies by the University of London Institute of Education (Blatchford et al) have raised significant concerns about outcomes for children with SEND where there is a high level of child/teacher dependency on LSAs

additional support was needed but that this would be subject to a cluster/area view: if ENF was not provided, the school/setting would 'find a way'.

- 5.31** There was evidence from this review that there is still variability in mainstream attitudes to inclusion and in teacher confidence/skills. A number of parents had had experience of this issue, which ENF allocations in themselves did not necessarily solve.
- 5.32** At a broader level, some parents felt that ENF could encourage short-term thinking and that there was a need for better support for longer-term pathway planning. The new EHC process is a potential vehicle for this. However, in systems where additional mainstream funding is less dependent on statutory assessment, this may be an issue that schools/settings and support services need to address more explicitly.

Parental involvement:

- 5.33** Evidence from the phone sample indicated that parents were variously involved in the process of ENF application. At one extreme, some parents were quite happy for the school/setting to lead and to be kept informed. At the other, two parents felt that they had had to initiate the process themselves. In both cases, their children were in early years settings that had limited knowledge/experience of the Hertfordshire system. The parents felt that they should have received better support and guidance from the Authority's support services (which had been involved from an early stage). Generally, the parents were happy with a 'school-led' system as long as there was good communication and relationships and they were confident that the school/setting was addressing their child's needs. On the other hand, the spirit of the new reforms puts parents in a more active role. And where things go wrong, parents feel they have limited options other than going down the statutory assessment route. Some felt that there should be a clearer 'right of appeal' for parents/carers if they thought that ENF decisions were wrong.

ENF process:

Before the Panel meetings

- 5.34** Heads and SENCos tended to find the ENF application form quite onerous. This was intended to focus on the educational impact of children's difficulties, but it was felt that there was a greater requirement to provide other evidence (such as information from professional reports). The form requires schools/settings to show how they plan to address the range of needs and how support will be used. Though not unreasonable, this aspect takes quite a bit of thought. SENCos in PVI settings found the process particularly difficult as they sometimes had limited experience and knowledge of what was required. There was a call for information demands to be streamlined and for the requirements for EHC plans and ENF applications to be better aligned, to avoid unnecessary duplication.

- 5.35** There was a concern that decisions could be unduly affected by the quality of the written submission and that this might penalise less experienced SENCOs and mean that some needs could be less well represented in the paperwork and their significance may be missed.
- 5.36** The cluster meetings were generally seen as a very positive aspect of the system. However, irregular attendance was reported in some clusters (despite the funding provided) and cluster representatives varied in how they saw their role¹⁶. Some PVI settings find it difficult to attend cluster meetings without funding and therefore only attend when they are requesting support. This means that they can feel less part of the process. Support services are generally actively involved at this level. Their contribution is positively valued in some clusters but less so in others.

At the Panel meetings

- 5.37** The meetings observed in Autumn Term 2015 were well-organised and professional. Papers were circulated in advance and these were carefully considered. A relatively limited number of cases were discussed and meetings are reported to be more challenging in the summer term when case numbers tend to be higher.
- 5.38** The SEN officers who chaired the meetings made sure that sufficient time was available to reach collective decisions and that the rationale for these was recorded. Some officers however expressed a concern that this role could conflict with their responsibilities within the statutory assessment process, particularly in the event of a SEN and Disability tribunal appeal.
- 5.39** The expected contribution of support service representatives was sometimes unclear. The Funding Handbook indicates that they are full members of the Panel and contribute to decisions as well as providing advice and information. However, some representatives felt less well placed to comment on needs with which they were unfamiliar, and some tended to emphasise their advisory vs decision-making role.
- 5.40** There is an expectation that, before the Panel meeting, service representatives will have consulted their team members (who may have more detailed knowledge of the child/context). It was not clear from the sample Panel meetings how far this was the case. Heads and SENCOs were concerned about the ability of some services to provide coherent background, given staffing shortages and service capacity¹⁷.
- 5.41** There was a strong emphasis during the meeting on the paperwork that schools/ settings had presented, with a reluctance to consider information that was supplementary or extraneous. The rationale was to try and ensure that decisions were equitable and that there was a limited scope for advocacy. However, this tended to mean that little account

¹⁶ And the time they were able to commit to it

¹⁷ Particularly the Educational Psychology Service which has been understaffed for a considerable period of time

was taken of context (eg physical features of the school/ setting; size/demography; additional resources already allocated). It also tended to reinforce a perception that successful application was a product of good presentation rather than necessarily the level of significance of children's needs.

After the Panel meeting

- 5.42** The Funding Handbook stresses the importance of good quality feedback about the reasons for decisions. It also emphasises the need for active follow-up, particularly in cases where there are likely to be ongoing issues. There was evidence that this aspect received less full attention in busier Panel meetings and that feedback in these cases could be limited. Some Heads and SENCos interviewed were concerned that the nature of feedback did not always match the severity of the issues or the level of effort that schools/settings had put into the application.
- 5.43** Follow-up tended to be left to the cluster representative. While this helps reinforce peer support and cluster responsibility, there were cases in the observation sample where there was clearly a need for more focused/intensive support service input. There was a tendency for service representatives to assume that schools/settings would contact them if needed, rather than seeing these situations more proactively as a service priority.
- 5.44** Discussions at the ENF conference in February indicated a need for more robust plans in some cases where the decision is 'No', with services and/or Panel members more actively involved. There was also a case for more active monitoring and review, to ensure that funding was being used in an effective way and was leading to positive outcomes.

Timing:

- 5.45** Some of the Heads and SENCos interviewed wondered whether the timing of the decision cycles could be altered to give more time for staff recruitment. Heads of PVI settings felt that more could be done to improve communication between Health, Education support services and parents, so that ENF applications could be considered before admission. A number of parents interviewed reported that admission was delayed while ENF applications were being considered.

Broader strategic links:

- 5.46** The introduction of Hertfordshire's SEND funding system predated the development of the Authority's DSPL strategy. A number of Heads argued that there should be stronger connections, with experience from the ENF process feeding into the identification of local priorities. The Handbook indicates that the DSPL Lead is expected to be a full member of the Area Panel. However, this is not the case in all areas¹⁸.

¹⁸ DSPL Leads are full-time Head Teachers and there is some reluctance to take on further responsibilities than they have already

- 5.47** Some also argued for a greater degree of local budgetary flexibility, with the ability to shift funding across provision and services to help address unmet need. This would allow DSPL Areas to determine the level of funding available for ENF in consultation with local schools/settings. It would also allow underspends to be recycled rather than transferred back into the overall system¹⁹.
- 5.48** There was a strong call for ENF to be more clearly linked to the Authority's broader SEND strategic planning, so that it becomes a more coherent element within the overall pattern of future services and provision.

6. REVIEW OF FUNDING OPTIONS: THE NATIONAL PICTURE:

- 6.1** A comparative analysis of funding systems in other areas of the country indicates three broad models:

¹⁹ Despite the pressures, Area Panels have continued to adhere to the budgets set for them and there can be underspends. Initially, these were used to offset overspends in other areas, but there is now less variability in practice. Any overall underspend is swept back into the general schools budget.

Individual funding through statements of need/EHC plans:

- 6.2** This is similar to Hertfordshire's previous system (though this was supplemented by a further system of allocation panels for lower levels of funding²⁰). Statutory assessment panels meet regularly to consider provision options for new statements, taking into account children's needs and parental preferences. If mainstream, then an appropriate level of additional funding is determined, subject to the statutory process of annual review. Top-ups are allocated in accordance with Authorities' thresholds.
- 6.3** The advantages of this system are that there is a clearer entitlement for individual children, which parents and schools can see as providing longer-term safeguards. There is also a statutory process for assessment and review.
- 6.4** The main disadvantages of the approach are:
- *Equity:* decisions are 'one-off' rather than based on a comparative consideration of children's needs in the Area; statutory assessment requests can reflect pressure from individual schools/parents rather than being linked to level of need
 - *Responsiveness:* the statutory process can take some time and there is an expected period of assessment and intervention before requests can be legitimately considered. There is less capacity to support early intervention. Once allocations have been made, there can be a reluctance to release them even if there has been positive progress. This makes the system less cost-effective.
 - *Administration costs:* the process of statutory assessment is administratively costly and should only be needed if other approaches for funding and coordinated support are not viable.
 - *Financial sustainability:* Authorities using this kind of approach have generally experienced ongoing increases in spend, as budgets are seen as 'demand-led' and open-ended. This expectation is difficult to sustain in a financial climate where funding for education is more constrained.

Banding/audit approaches:

- 6.5** A number of Authorities have developed banding systems through which the range and levels of special educational need are more specifically defined. This approach originally derived from the Pupil Audit system designed by Kent County Council in the 1990s and used to inform the initial SEN Code of Practice. There are usually a number of bands or levels within each category of need (cognition and learning; communication and interaction; behaviour, emotional and social; physical/medical; sensory), which are defined partly by increasing levels of difficulty and partly by the levels of provision required to ensure these needs are met.

²⁰ EPF (earmarked pupil funding)

6.6 The system specifies which bands schools should cater for themselves, and which can be put forward for additional funding. Some Authorities still link decisions to the statutory assessment process. Others use bands as criteria to inform more flexible resourcing systems.

6.7 This model is attractive to schools/settings as it is more educationally-based. Decisions are made on the basis of criteria which are specified. These include clearer information on the levels of need and intervention that schools/settings should be expected to cover themselves. There is also a greater sense of individual entitlement, as, once a band is assigned, there is an assumption that this will generate funding on a longer-term basis.

6.8 The main disadvantages of the approach are:

- *Subjectivity:* criteria may be clear for some areas of need (eg attainment levels for children with learning difficulties; level of care/support required for those with physical/medical needs), but they can be variously interpreted in social/behavioural areas (eg ASD/BESD) and give the illusion of objectivity
- *Moderation:* a substantial system of moderation is necessary to ensure that criteria are commonly understood and applied. With pressures on schools and more limited capacity at officer level, this can be difficult to achieve²¹.
- *Perverse incentives:* the strong link between funding and levels of difficulty provides a strong incentive for children's deficits to be emphasised. There is also a tendency for bands to reinforce dependence on LSA support.
- *Financial sustainability:* As with the previous model, Authorities using this kind of approach have generally experienced ongoing increases in spend, as budgets are seen as 'demand-led' and open-ended. This expectation is difficult to sustain in a financial climate where funding for education is more constrained.

Exceptional/predictable needs:

6.9 This is the type of model currently used in Hertfordshire and a number of other Authorities that have moved away from the more traditional funding approaches. The model is associated not only with a higher level of delegation/devolution but also a more collective process for targeting resources on a more limited number of children with more complex/significant needs. Decision-making is more periodic and comparative, with the needs of a range of children being considered with a budget that has usually been pre-determined.

6.10 The main advantages of this kind of approach are:

²¹ When Kent developed the Audit, it had a team of 14 full-time moderation officers and a substantial and ongoing programme of training for SENCOs and support services.

- *Greater flexibility:* higher levels of devolution/delegation mean schools can develop their longer-term capacity to meet a broader range of needs. At area level, there is more ability to move resources around in response to changing need.
- *More active moderation:* focusing attention on a smaller number of individual children with exceptional needs allows for more active moderation and a more equitable approach to targeting resources to those children with the biggest difficulties
- *School involvement:* involving practitioners in decision making provides a more up to date view of school context and challenges, and the changes in needs that schools are having to address. It also encourages a more collective and collaborative approach to meeting local needs.
- *Managed approach:* Unlike the two previous models, there is an assumption that resources are finite, and that higher devolution means that the remaining elements of funding need to be carefully managed. Authorities using this kind of model are better able to stay within budget and the approach is therefore more likely to be sustainable at times of financial constraint.

6.11 The main disadvantages of the approach are:

- *Exceptionality:* the identification of exceptional need is dependent on collective judgement, with the assumption that criteria are complex and multiple rather than simple/unitary. This can lead to a demand for greater clarity. There can also be a concern that the definition of exceptionality is relative rather than absolute and more affected by financial considerations than some other systems.
- *Parent/pupil entitlement:* the model tends to involve a separation between resourcing and statutory assessment processes. Resources can be accessed without statements/EHCPs and, conversely, statements/EHCPs do not necessarily lead to additional funding. This loses some of the sense of individual child entitlement that is provided by the other two models.
- *Links with the statutory assessment system:* where there is a high level of school/parent confidence in the funding system, links are relatively straightforward. Statements/EHCPs only become necessary when specialist provision is being considered or for the purpose of longer term planning. However, if there is a loss of confidence in the system, then there is risk of both processes running in parallel, leading to a duplication of energy and potential confusion.

7. CONSIDERATION OF FUTURE OPTIONS:

- 7.1** It is suggested that formal discussions about future options are included in the dissemination of this review. As indicated in 5.3 above, the predominant view expressed by Heads and SENCOs interviewed was that the current system is preferable to the other

available options (particularly those where funding is led by statutory assessment). However, there are significant issues to address. And, for parents/carers to be convinced that this system is best placed to ensure their children's needs are met, there will need to be considerable further thinking and discussion.

7.2 In particular, consideration will need to be given to the following areas:

Budget sufficiency: Does the ENF budget need to be increased to take into account a growing number of children with high needs, or will this simply increase demand and expectations, and lead to the current system becoming more administratively cumbersome?

Given that national funding for education is likely to be increasingly constrained, what are the potential sources for any increase, other than a larger top slice from mainstream and early years budgets?

If ENF budgets are maintained at current levels, does there need to be greater clarity and transparency about the amount and focus of funding that has been delegated/ devolved, to ensure that school and parent expectations are set at the right levels?

Entitlements: If these are to be set at school/setting rather than individual child level, then what processes are needed for evaluating and challenging practice? How can parents/carers be more certain that their children's needs will be met? And how can this be tied into specifications of the Authority's 'local offer'?

Consistency: What steps can be taken to ensure that there is greater consistency in decision-making across Areas of the county, and that this is demonstrated and perceived to be the case? What steps can be taken to ensure greater parity across different age-phases/types of need? How can processes be developed to further reduce the potential for advocacy and ensure that allocations are based on the level of children's needs? What would be the advantages/disadvantages of providing more explicit criteria for judgements that schools/settings, parents and officers/services could follow?

Support services: Is best use being made of their knowledge and skills? What impact are they having at cluster level in terms of strengthening capacity? Should they have more targeted role in follow-up for children receiving ENF allocations or in finding ways forward for schools/settings where ENF has been refused?

8. RECOMMENDATIONS:

8.1 All available options and implications should be considered before deciding the way forward. This report should be broadly disseminated with opportunities for further discussions with all relevant stakeholders.

8.2 If the current model is maintained, consideration should be given to the following:

Budget

- (i) Providing a modest increase in the budgets available for Area Panels to allocate. Possible sources could include:
 - An increased top slice from mainstream budgets
 - Use of the one-off uplift in High Needs Block funding provided by the DFE this year
 - An increase in thresholds for multiple cases²²
 - Allowing Areas to carry over underspends
- (ii) Providing clearer and more transparent information on the amount of funding delegated to individual schools and the level/range of needs that this is expected to cover (linked to the local offer)
- (iii) Considering the potential impact of the increase in educational entitlement for 3 and 4 year olds with working parents, from 15 to 30 hours²³ per week

Consistency

- (iv) Monitoring spend and adjusting to ensure a fair distribution across age phases
- (v) Setting up a formal retrospective sampling process to check comparability of decisions and reporting on findings²⁴
- (vi) Reducing the number of officers involved in Panel activity, with more coverage of more than one Area²⁵
- (vii) Continuing to monitor spend across different types of need and ensuring all allocations are focused on promoting greater independence
- (viii) Addressing potential advocacy issues by:
 - ordering cases by school/cluster and providing background on existing allocations
 - further clarifying the expected role of support service representatives
- (ix) Setting out clearer criteria for judgements (across all types of need), while recognising the risk that these can become ‘hurdles to jump/points to prove’ in the push for additional funding
- (x) Ensuring more systematic challenge to schools/settings that are making ineffective use of their delegated funding and resources

Parental involvement

- (xi) Strengthening the process for parental involvement in shaping individual support plans at school level
- (xii) Providing a higher level of support to parents in pathway planning and understanding the contribution of ENF to this process
- (xiii) Considering the inclusion of Parent Partnership Officers at Area Panels²⁶
- (xiv) Involving HPCI representative(s) in retrospective sampling (see (iii) above)

²² A relatively small increase would release around £1m for area allocation and the number of schools receiving multiple case funding would reduce by half.

²³ Expected to come into operation in September 2017

²⁴ And considering implications for the distribution of budget to Areas

²⁵ As was the case when the system was first introduced

²⁶ More appropriate than ordinary parents for confidentiality/data protection reasons

- (xv) Considering whether it is appropriate for parents to have a ‘right of appeal’ or whether this should be through the current option of resubmission

Process

- (xvi) Reviewing the timing of panel and cluster meetings to ensure that these give sufficient time for feedback and recruitment of staff.
- (xvii) Improving communication between Health, Education support services, parents and early years settings so that ENF applications can be made for children with significant needs in advance of admission
- (xviii) Having a more robust approach to the issue of non-attendance at cluster meetings
- (xix) Considering options for the further involvement of PVI settings at cluster level (eg through a local funded representative)
- (xx) Streamlining the application form and aligning this more closely with other information demands (eg those required for statutory assessment)
- (xxi) Allowing more consideration of contextual information to help decision making while continuing to guard against the potential for advocacy
- (xxii) Considering the option of more flexible financial allocations rather than limiting these to funding for LSA hours
- (xxiii) Reviewing support service representation and the ways in which service practitioner perspectives are best included. A more cost-efficient approach might be representation is through a single ISL²⁷ manager, with better internal mechanisms for drawing together relevant practitioner views
- (xxiv) Developing clearer feedback and follow-up arrangements after decisions have been made, through:
- Identification of a named Panel member who is available for further discussion/clarification if needed
 - Clearer arrangements for monitoring/review where funding is allocated
 - More targeted support service involvement where applications are refused but there are low levels of confidence that needs will be met (ie more formal ‘No’ plans)

²⁷ Integrated Services for Learning

Training/communication

- (xxv) Continue to provide opportunities for training with regard to the funding approach, so that new Heads, SENCOs and PVI setting managers are more aware of the system and its rationale
- (xxvi) Provide more specific networking opportunities for cluster representatives to help support the development and delivery of their important role
- (xxvii) Include consideration of exceptionality as an ongoing feature of local SENCO networks²⁸
- (xxviii) Provide further opportunities for communication with parents/carers about the system²⁹

²⁸ This was reported to have been very helpful in promoting more consistent understandings in Hertsmere

²⁹ A considerable amount of consultation with parents occurred when the system was first introduced. However communication since then has been less strong