

**CONSULTATION ON FUNDING HIGH NEEDS PROVISION 2020/21**

**1. Introduction & Summary**

1.1 This consultation document is written to set out, and 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 2020/21 financial year. This is known, and referred to, as our ‘Place-Plus’ system and has two parts: a) core (or place) funding and b) top-up (or plus) funding.

1.2 The DfE announced in September 2019 a full review of the SEND / EHCP system. The DfE also conducted in summer 2019 a ‘Call for Evidence’ on the financial arrangements for SEND and alternative provision. These together are very likely to result in changes to the national high needs funding system in the future. For 2020/21, based on announcements made prior to the general election held on 12 December, the basic construct of the national high needs funding system is anticipated to remain in place and unchanged from existing arrangements. Our consultation here assumes this. If changes in the national system, or changes to the values of High Needs Block funding previously announced, are made for 2020/21, following the general election, we will need to assess how these changes affect our proposals and we will need to discuss this with the Schools Forum and possibly revise our proposals and consult again. This may affect implementation timescales. However, in seeking to ensure appropriate consultation and recognising lead in times, we cannot delay any longer signalling and consulting with schools and other providers on our proposals for our high needs funding approach locally from April 2020.

1.3 In particular, as signalled in our consultation in autumn last year, we have now developed locally an amended approach to the funding of the ‘top up’ element for EHCPs, which we propose to adopt from April 2020, meaning that, if agreed, a new Banded Model will replace our existing ‘Ranges Model’. This is the most significant of the proposed changes set out in this document. This change will affect the funding of all existing and new EHCPs in all settings, both mainstream and specialist. It is our intention to use this new model as the vehicle through which to release to providers a significant proportion of the additional High Needs Block funding that is expected to be allocated to Bradford in 2020/21, recognising that the values of top up for EHCPs in Bradford have remained cash flat in recent years. Following announcements made prior to the general election, Bradford is set to receive an uplift of £11.5m (17% per pupil) in High Needs Block funding in 2020/21, with this increase proposed to be allocated by us to enable the continued creation of more specialist places as well as to uplift the delegated high needs funding for mainstream settings and high needs providers in response to increased (salaries) costs.

1.4 At this point, it is important to emphasise that the way that we propose to move to the new Banded Model for the funding of top-up for EHCPs at April 2020 means that all existing EHCPs will see uplift in funding. No existing EHCPs will reduce in value as a result of funding model change.

1.5 In addition to the move to the new Banded Model, we propose in this document to

* Establish a new Day-Rate model for the funding of our Pupil Referral Units for the delivery of provision for pupils that are permanently excluded.
* Enhance the value of split site funding for special schools operating across satellite sites.
* Add into the funding model for Early Years Enhanced Provisions in maintained nursery schools a small setting protection factor.
* Amend and clarify how the cost of specialist equipment is shared between schools / providers and the Local Authority, meaning especially that a) special schools will be able to access support for the cost of equipment, and b) schools / providers will be required to meet the first £1,000 of the cost of all equipment, subject to a ‘reasonableness cost assessment’ made by the SEND Panel.

1.6 As we set out in our Schools Block consultation, we are minded not to propose any amendments in 2020/21 to our existing notional SEND and SEND Floor arrangements for mainstream primary and secondary schools and academies. This means that we would continue to protect SEND Floor allocations, by guaranteeing that all schools would receive at least the same cash allocation as they did in 2017/18. Please see Appendix 4. We will continue to keep this position under review.

1.7 The funding model changes we propose are made in context of the following wider structural changes

* The continued creation of additional specialist places in Bradford. A list of planned commissioned places by setting is provided at Appendix 5.
* The development and expansion of new Local Authority-led resourced provisions in mainstream primary and secondary schools and academies.
* The completion of the ‘restructuring’ of our PRU provision, where our PRUs going forward deliver provision for pupils permanent excluded.
* The completion of the re-alignment of responsibility between the High Needs Block and schools for the funding of alternative provision that is commissioned by schools. The High Needs Block’s funding of District PRU and the Primary Behaviour Centres ceases at 31 August 2020.
* The amalgamation of Bradford’s hospital education, Tracks and medical home tuition provision into a single Local Authority managed service.

**1.8 The deadline for responses to this consultation is Tuesday 4 February 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. Significant changes to the way high needs provision is funded were required to be implemented by the DfE for the 2013/14 financial year. These changes, now well established, affected activities funded by the High Needs Block (HNB), which is a specific block of money within the Dedicated Schools Grant (the DSG) that amounts to about 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 In 2020/21, based on announcements made prior to the general election, Bradford Council expects to receive in the region of £81.17m High Needs Block funding within our DSG allocation. Around 93% of the £81.17m funding 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).
* Children and young people placed in independent provisions and non-maintained special schools.

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

2.6 Unlike for primary and secondary schools, 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 responsibility for the management / formula funding of High Needs Block (HNB) provisions.

**3. DfE-Led National High Needs Funding System 2020/21**

3.1 For 2020/21, based on announcements made prior to the general election held on 12 December, the basic construct of the national high needs funding system is anticipated to remain in place and unchanged from the arrangements and thresholds that operated in 2019/20. The most obvious elements are place funding, set at £10,000, and element 2 funding, set at £6,000. These are unchanged.

3.2 The DfE has recently announced a full review of the SEND / EHCP system. The DfE also conducted in summer 2019 a ‘Call for Evidence’ on the financial arrangements for SEND and alternative provision. These together are very likely to result in changes to the high needs funding system in the future.

**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 or provider.

4.3 Core (or place) funding for Bradford’s stand alone maintained special schools and special school academies, and for PRUs, 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 local authorities. Additional place funding, where an institution’s number on roll exceeds the number of places during the year, is allocated by Bradford Council. An end of year reconciliation is actioned however, which means that 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 (EYESP), 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 (notionally 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 2020/21 academic year will be based on the number of students recruited in 2019/20.
* 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 local authorities commission high needs places.
	2. within the formula funding received by Bradford’s maintained nursery schools that have resourced provisions where local authorities commission high needs places. £6,000 is the value for 1 FTE place. Therefore, a 15 hour place = 0.6 FTE (£3,600) and a 30 hour place = 1.2 FTE (£7,200).
	3. within the formula funding received by Bradford’s Further Education Colleges where local authorities commission high needs places post 16.

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 Elements 2 and 3, whereas for School-led provisions these Elements are delegated 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 paragraphs 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 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 4 for more technical information. A separate ‘SEND Floor’ mechanism in our approach currently ensures that all mainstream primary and secondary schools and academies receive a minimum amount of SEND formula funding, compared against the value of EHCPs of children at a school or academy. In effect, the SEND Floor provides a top up for schools and academies with higher numbers of individual EHCPs at a value greater than £6,000 that have generally lower levels of FSM and IDACI and higher levels of attainment. The values of SEND Floor allocations, and the basis of the calculation, are set out for each school in the monthly high needs funding statements the Council publishes. Please see Appendix 4 for more technical information.

4.9 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. The Council has put in place an Early Years SEND Inclusion Fund, also funded from the Early Years Block, which enables Element 2 funding to be allocated to support children with low level non-EHCP emerging SEND. In addition, early years providers of the 3 and 4 year old entitlement are entitled to receive a one off payment of £615 per year for children eligible for the Disability Access Fund (DAF). Further details on the SEND Inclusion Fund and DAF can be found in our Early Years Technical Statement [here](https://bso.bradford.gov.uk/Secure/CMSPage.aspx?mid=1904).

4.10 Place funding for education in hospital provision, nationally, has still to be brought into the Place-Plus methodology. Currently, local authorities are required to maintain prior-year place funding values. The rate of funding per place Bradford Council has set in 2019/20 is £18,465. The DfE consultation on the approach to the funding of hospital provision going forward is still to be published and reviewed. Please note that Bradford’s hospital provisions closed as separate PRUs on 31 August 2019 and Tracks is scheduled to close as a separate entity on 31 August 2020. Provision is continuing as a single Local-Authority managed central service. Amalgamation will be completed at 1 September 2020. The funding of the centrally managed service will operate outside the Place-Plus mechanism, working within the discrete allocation provided for this service within our High Needs Block. This will be subject to annual review and any changes in our discrete allocation from the DfE. A transitional fixed budget, based on its 2019/20 current place-plus derived allocation, will be delegated to Tracks for the period up to 31 August 2020.

4.11 The funding of independent schools has also not yet been brought into the national Place-Plus funding system. The basis of funding of placements in these is settings 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 2020/21**

5.1 Bradford Council’s DSG High Needs Block planned budget currently assumes that the places that are set out in Appendix 5 will be commissioned in 2020/21.

5.2 These numbers include / take account of:

* For individual SEND settings, the greater of either actual occupancy at November 2019 or the 2019/20 planned places total, with some adjustments to individual settings for known specific changes and planned increases and reductions.
* The continuation and full year impact of the additional places that have been created between April 2019 and April 2020, which are now allocated to individual settings.
* 100 additional SEND places to begin to be created during 2020.
* An estimate of the number post 16 places in Further Education Colleges for the 2020/21 academic year, based on predicted occupancy information.
* The agreed cessation at September 2020 of the High Needs Block’s funding of school-commissioned alternative provision places at District PRU and at the Primary Behaviour Centres.
* The amalgamation of hospital education and Tracks places within a single Local-Authority managed service.

5.3 Within the 2020/21 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: 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.

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. However, due to increasing budget pressure, the Council, with the Schools Forum, has agreed for the High Needs Block to step back from meeting the cost of 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 sector) 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 funding relating to children and young people placed with them by other local authorities.

6.4 Bradford Council currently allocates Pupil-Led Need top-up for children and young people with EHCPs following a Ranges Funding Model. This model is attached for reference at Appendix 2. This model is used to assign pupils into categories of need for funding purposes. Each range has an applicable level of funding, and every pupil assigned to a range is allocated that set value of funding.

**6.5 We have developed locally an amended approach to the funding of the ‘top up’ element for EHCPs, which we propose to adopt from 1 April 2020. If agreed, this new Banded Model will replace our existing ‘Ranges Model’.**

* **This change will affect the funding of all existing and new EHCPs in all settings, both mainstream and specialist.**

* **It is our intention to use this new model as the vehicle through which to release to providers a significant proportion of the additional High Needs Block funding that is expected to be allocated to Bradford in 2020/21.**
* **The way that we propose to move to the new Banded Model at April 2020 means that all existing EHCPs will see uplift in funding. No existing EHCPs will reduce in value as a result of funding model change.**
* **The proposed new model is set out in more detail in Appendix 3.**

6.6 In continuing to use a Banded Model, the Council’s intention is to retain a single transferrable 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.

6.7 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 2020/21 Regulations require an MFG of 0%. As our new model proposes to increase the values of all EHCPs by a minimum value of 8.2% we are compliant with the requirements of the MFG without needing to adjust our model to provide for minimum values.

6.8 For the Pupil-Led Need top-up funding of post 16 high needs students with EHCPs in the Further Education sector, it has been agreed 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 formularise this funding element. We propose to continue this approach in the application of the new Banded Model from April 2020.

6.9 The total value of top-up funding owed to an institution by Bradford Council, calculated using the Banded Model, will continue in 2020/21 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.

6.10 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.

**Question 1 – Do you agree with the new Banded Model proposed by the Local Authority as set out in Appendix 3? If not, please can you explain why not.**

**Question 2 – Do you agree with the transition approach to the new model that is proposed by the Local Authority? If not, please can you explain why not.**

**Question 3 – Do you have any comments (including technical comments) on the proposed new Banded Model you would like the Authority to consider?**

**7. Top-Up Funding: 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 the setting operates across a split-site and therefore, has certain duplicated and additional costs.

7.3 Appendix 4 sets out in more technical detail these factors within Bradford Council’s proposed funding approach for 2020/21 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 As set out in Appendix 4, for 2020/21 we propose the following changes, to:

* Enhance the value of split site funding for special schools. The full year value of the lump sum is proposed to be uplifted to £198,500 from the 2019/20 value of £162,850.
* Uplift the value of the New Services Delegation factor for special schools by 8.2% from £364 to £393.85 per pupil, in line with the basic Banded Model increase.
* Uplift the value of the Post 16 Element 1 Enhancement factor for special schools from £1,100 to £1,200 to keep in line with the national Element 1 figure for post 16 provision (which increases from £5,100 to £5,200 in 2020/21).
* Add the small setting protection factor applied to the School-Led Resourced Provisions to the funding model of the Early Years Enhanced Specialist Provisions.
* Remove all Setting-Led Need factors within the PRU model with the funding that was previously allocated by these factors now incorporated into the proposed new Day Rate approach (please see paragraph 8).

7.6 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 6.9.

**Question 4 – 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 5 – Do you have any comments (including technical comments) on the setting-led need factors you would like the Authority to consider?**

**8. PRUs – Day Rate Top Up Funding Model**

8.1 This section sets out the basis proposed for 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), where the Authority plans to commission 100 places in total in 2020/21. The methodology and principles set out here will 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. These PRUs also then receive a value of top up funding for places occupied through the placement of pupils permanently excluded that has previously been calculated using a long-standing agreed formula, which takes 50% of Range 4D and 50% of Range 5 to produce an annual value of £8,800 per place. This formulaic basis 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 can fluctuate.

8.3 Our PRUs have also previously accessed additional setting-need led top up funding for small setting protection, business rates, new services delegation and pupil mobility.

8.4 A number of local authorities operate what are known as ‘day rate’ mechanisms for the calculation of top up funding for their PRUs. Via these mechanisms, 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 value of the day rate can adjust up and down according to the PRU’s overall occupancy to ensure that a minimum level of funding is allocated to enable the PRU to meet fixed costs and to retain sufficient capacity for the Authority to use. The model is informed via an 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 would be reviewed for the following year.

8.5 We propose to move to a day rate mechanism for the funding of our two PRUs from April 2020. This mechanism has already been piloted in the funding of BAPAC from September 2019. It should be noted that the provision being delivered by Park PRU is currently in transition, moving from longer-term EHCP provision to permanent exclusion provision, so there will be some transition in the funding mechanism between April and August 2020 (where EHCP pupils still on roll will be funded using the Banded Model and where there will be some funding protection to enable the PRU to re-shape its provision). We anticipate that the new day rate mechanism will be in place in full for both PRUs from September 2020.

8.6 Our proposed day rate model is constructed on 50 place provision.

8.7 £8,800, which is the annual value of pupil-need led top up we currently use, converted to a day rate is £45.13 (£8,800 divided by 195 school days a year). This does not include the additional funding that is currently allocated via the setting-need led factors (small setting protection, business rates, new services delegation, pupil mobility). We propose to set a total day rate of £62.27, which incorporates these existing setting-need led factors as well as the main pupil-need led provision. £62.27 is prior to any uplift for inflation at April 2020, which is to be agreed with the Schools Forum.

The £62.27 is calculated as follows (rounded):

|  |  |  |
| --- | --- | --- |
| **Factor** | **£Day Rate Value** | **£Cash Budget 50 places 195 days** |
| Main pupil-need led provision | £51.28 | £500,000 |
| Small Setting Protection (as special schools) | £5.13 | £50,000 |
| Business Rates | £1.54 | £15,000 |
| New Services Delegation (as special schools) | £1.87 | £18,200 |
| Pupil Mobility | £2.45 | £23,950 |
| **Total** | **£62.27** | **£607,150** |

8.8 Where the PRUs are close to full occupancy through the year, they will be funded at £62.27 per day. The basic day rate value of £62.27 is proposed to be adjusted however, where necessary, to ensure a minimum level of funding to enable capacity retention, meaning that the PRU will not receive less than:

* 100% of the funding for the setting-need led factors. This is £107,150 in cash terms.
* 88% of the £500,000 main provision element (this is equivalent to £8,800 per place on an annual basis).

On this basis, the minimum top up funding that would be allocated to a 50 place PRU provision would be £547,150 (£51.28 x 0.88 x 195 x 50 + £107,150). If the PRU was 85% occupied across the year, the actual day rate, incorporating these fixed minimums, would be £66.05.

8.9 A quick note on two technical features around the in year application of this proposed model:

* Although there is the option alongside this model to move to a more sensitive approach to the counting of actual occupancy in the PRUs, at this stage for 2020/21, we do not 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 expect to continue to re-calculate the funding of the PRUs on a monthly basis as now, taking the 10th of the month census as the actual occupancy for that month. We will keep this under review.
* We will also continue in 2020/21 to calculate and profile top up funding across 12 months, but will keep this under review. As we have moved to using a day rate and 195 school days, 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 PRUs 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 where the numbers on roll in our PRUs are significantly different at different times of the year.

8.10 As this new model will be implemented for the first time on a full year basis in 2020/21, we would expect to fully review it for 2021/22 to ensure that it is working to effectively support the PRUs as well as to ensure the appropriate allocation of resources from the High Needs Block.

**Question 6 – Do you agree with the Day Rate mechanism that the Authority proposes to use to fund the PRUs from 1 April 2020? If not, please can you explain why not.**

**Question 7 – Do you have any comments (including technical comments) on the proposed Day-Rate mechanism you would like the Authority to consider?**

**9. Sharing the Cost of Specialist Equipment for Children and Young People with EHCPs**

9.1 Specialist equipment “is a piece of portable equipment, which having been assessed for by a relevant professional is required to avoid substantial disadvantage to a child with a complex disability. This equipment must be specialist or used for a specialist purpose i.e. relating to that child’s or young person’s special educational need or disability and should facilitate access to the environment / facilities / curriculum and should usually move on with the child or young person”.

9.2 A shared approach to meeting the cost of specialist equipment for children and young people with EHCPs supports the Council, schools and other providers to develop and maintain inclusive provision and to meet the requirements of the Equality Act 2010. Bradford is in line with the practice found in other authorities in sharing the cost of specialist equipment for children and young people with EHCPs between the High Needs Block and school delegated budgets. This section does not talk about the relationship between health and education services in the sharing of costs. It sets out how the cost of the education service element is shared between the Council and schools.

9.3 In Bradford, the cost is currently shared as follows:

* Mainstream schools and other providers are expected to meet from their delegated budgets (from their £10,000 Element 1 and Element 2 resources) the full cost of items required by pupils with a special educational need / disability where this cost is lower than £1,000. The SEND Panel will typically assess that this is a ‘reasonable’ cost for the school / provider to meet. These items tend to remain with the school / provider and are transferrable.
* Schools and other providers may request, via application to the SEND Panel, that the Local Authority meets the full cost of the necessary specialist equipment. The SEND Panel will typically assess that this is not a reasonable cost for the school to meet where the item costs more than £1,000 and is specialised / personalised to the child or young person and would travel with them to their next setting. Where agreed, the full cost of the item is currently met centrally without contribution from the school or provider.

9.4 This approach has been in place since 2012. There are some developing issues that the Council would like to resolve by proposing to adjust the principles that guide our arrangements:

* Firstly, the scope and terms of access would benefit from clarification. This will be done more thoroughly in more detailed guidance following the outcomes of this consultation but the scope of access for providers is clarified in the paragraphs below.
* Secondly, special schools currently do not access financial support. This is because, previously, special schools have had access to a discrete specialist equipment budget, funded within the High Needs Block, agreed by the Schools Forum and managed by the District Achievement Partnership. This was originally £150,000, but was reduced to £75,000 and was then ceased at April 2018 as one of the contributions that special schools agreed to make in the management of overall High Needs Block financial pressure. Support for the cost of equipment should now be re-instated in a fair and equitable manner.
* Thirdly, an approach that sets a hard £1,000 threshold produces a ‘cliff-face’. As an illustration, a school would be required to cover in full an item with a cost of £900 but would not pay anything for an item costing £1,100. This hard approach is out of step with that taken in other authorities, where schools are typically asked to make a set contribution to the cost of all equipment no matter the value.

9.5 In response, we wish to clarify and propose that access to financial support for the cost of specialist equipment applies for 1 April 2020 to all children and young people with EHCPs whose home address is within Bradford and who attend the following:

* Mainstream schools – primary and secondary
* Academies – primary, secondary, special and alternative provision
* Special schools – maintained, non-maintained and independent
* Primary and secondary free schools
* FE Colleges
* Early Years settings provided by the Local Authority – maintained, non-maintained, independent
* Independent primary and secondary schools
* PRUs

Therefore, our arrangement is extended to include maintained special schools and special school academies.

For clarity, if a child or young person does not reside within the geographic boundary of Bradford the school should request funding for specialist equipment from the home authority. Correspondingly, Bradford Council will fund specialist equipment for Bradford children and young people who are attending a school outside of Bradford where the request meets the requirements of our guidance. Out of authority schools will be expected to make the same contribution to the cost as Bradford located schools (see below).

9.6 Also in response, we propose to move from 1 April 2020 to a contributory rather than a hard threshold arrangement, where all schools and other providers will be required to meet the first £1,000 of the cost of all equipment. Specifically, in terms of change, this proposal means that schools and providers will be required to contribute £1,000 to items costing more than £1,000 where previously schools would not have contributed to these items.

9.7 We propose also to clarify:

* Where any school / provider believes that they do not have the resources to fund the required £1,000 e.g. the school / provider has a large number of SEND pupils requiring specialist equipment and has already contributed to these, or evidences that they have already spent at least £1,000 on the cost of specific equipment for that child or young person, the school / provider should set this out and evidence this in their application to the SEND Panel. The SEND Panel will make an assessment of the ‘reasonableness’ of charging on this occasion and this may mean that the school / provider is not required to contribute or is asked to contribute a smaller amount.
* As early years settings (including mainstream, independent and private) do not receive Element 2 (£6,000) funding they will not be expected to contribute towards specialist equipment. This also applies to specialist equipment for a child in an early years setting within a school. For a child in reception class within a school the first £1,000 would apply to this situation as the school is in receipt of Element 2 funding.

**Question 8 – Do you agree with the amendments to the approach to the sharing of the cost of specialist equipment that are proposed? If not, please can you explain why not.**

**Question 9 – Do you have any comments (including technical comments) on the proposed approach to the sharing of the cost of specialist equipment you would like the Authority to consider?**

**10. Consultation Responses**

10.1 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 paragraph 1. Please ensure that your response is submitted by the deadline of **Tuesday 4 February 2020.**

**11. Next Steps**

11.1 The Schools Forum will make its recommendations on the allocation of the DSG for the 2020/21 financial year across its two meeting in January 2020. These meetings cannot be pushed back due to the deadlines that the ESFA has set for the return of the information it requires for the calculation of GAG allocations for academies and due to the lead in time needed to progress these DSG recommendations for final decision through Council.

11.2 Recognising that the final detail of our 2020/21 high needs funding model will be subject to the outcomes of this consultation, which does not close until 4 February, the Forum will be asked to recommend in January that sufficient budget provision is made to enable the proposals as set out in this document to be implemented. The Forum will be asked at the same time to gives its ‘formal’ feedback on the detail of the Council’s high needs funding proposals.

11.3 This consultation will close on 4 February. The final proposed funding model, taking account of the feedback from this consultation, will be presented to the Council’s Executive and then to full Council on 20 February 2020 for final decision as part of the normal annual overall Schools Budget and Council Budget setting process.

11.4 Subject to the outcomes of the consultation, and the agreement of Council, a final agreed model will be used to allocate High Needs Block funding to providers from 1 April 2020.

11.5 However, reminding of the warning given in paragraph 1.2, our consultation here assumes that the national high needs funding arrangements for 2020/21 will be as announced prior to the general election. If changes in the national system, or changes to the values of High Needs Block funding previously announced, are made for 2020/21, following the general election, we will need to assess how these changes affect our proposals and we will need to discuss this with the Schools Forum and possibly revise our proposals and consult again. This may affect implementation timescales.

**12. Appendices**

Appendix 1 Summary of the Place-Plus system and how this works for different providers

Appendix 2 Bradford’s Current Pupil-Led Need Top Up Funding Ranges Model 2019/20

Appendix 3 Proposed new Banded Model for Pupil-Led Need Top Up Funding for implementation at 1 April 2020

Appendix 4 Technical Annex (including Setting-Led Need factors)

Appendix 5 Planned Commissioned Places 2020/21 (Bradford-located settings)

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) | Element 1 is included within the per-pupil funding allocated through the local school funding formula (NFF).Element 2 - the first £6,000 of additional support cost – is also already delegated with the school’s formula funding allocation.Notional SEND defines the value of funding already allocated (see appendix 4). | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be commissioned. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | None. | SEND Funding Floor for pre-16 provision (see appendix 4). |
| **Mainstream early years** (nursery schools, classes and PVI providers) | Element 1 is included within the per-pupil funding allocated through the local EYSFF.Early Years SEND Inclusion Grant allocates Element 2 (£6,000) for eligible low level emerging SEND (non-EHCP) as agreed by Panel. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school or provider. | n/a | n/a | None. | Early Years SEND Inclusion Grant.DAF Grant. |
| **School-led Resourced Provisions** (mainstream primary & secondary)*(formerly known as DSPs).* | 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.Both Elements 1 and 2 are retained by the school.Element 1 is set at a minimum of £4,000 per agreed place. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be commissioned.Both Elements 1 and 2 are retained by the school. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | Small Setting Protection.3% Cash Budget Protection. | None. |
| **Local Authority-led Sensory Need Resourced Provisions** (mainstream primary & secondary).*(formerly known as ARCs).*. | 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.The host school retains Element 1, set at a minimum of £4,000 per agreed place. Element 2 funding is retained by Bradford Council. This currently requires host schools to repay Element 2 back to the Council. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is retained by Bradford Council. | Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be commissioned.The host school retains Element 1. Element 2 funding is retained by Bradford Council. This currently requires host schools to repay Element 2 back to the Council. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is retained by Bradford Council. | None. | None. |
| **Local Authority-led Resourced Provisions** (mainstream primary & secondary).*(newly establishing from 2019).* | 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 agreed to be commissioned but not occupied by pupils on roll in October in the previous year.The host school retains Element 1, set at a minimum of £4,000 per agreed place. Element 2 funding is calculated at £6,000 per commissioned place and is retained by Bradford Council. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is retained by Bradford Council. | Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be commissioned.The host school retains Element 1. Element 2 funding is retained by Bradford Council. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is retained by Bradford Council. | None. | None. |
| **Early Years Enhanced Specialist Provisions** (maintained nursery schools) | Elements 1 & 2 are allocated through a combination of per-pupil funding allocated through the local EYSFF plus £6,000 per FTE commissioned place. Both Elements 1 and 2 are retained by the school.Additional Element 1 funding is paid using EYSFF rates for any FTE places not occupied in the EYSFF termly censuses.  | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). All EYESP places have previously been funded at Range 4D. Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | n/a | n/a | Currently None. Proposed to include Small Setting Protection from April 2020.Please see appendix 4. | None. |
| **Maintained Special Schools & Special School Academies** | 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.Retained by the school. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | £10,000 per place based on an agreed number of places.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 actual total composite occupancy across the year.Retained by the school. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Banded Model at April 2020 (see appendix 3).The top up funding is allocated to and retained by the school. | Split Sites. Proposal to enhance this funding from April 2020.Post 16 element 1 enhancement.New Services Delegation.Small Setting Protection.3% Cash Budget Protection.Please see appendix 4. | None. |
| **Primary Behaviour Centres** (funding of provision for pupils permanently excluded)*Note that the High Needs Block’s funding of these Centres ceases at 31 August 2020.* | Elements 1 and 2 are combined in a fixed £10,000 per place, based on an agreed number of places to be commissioned.Retained by the school.The HNB’s funding ceases at 31 August 2020. | Agreed per-pupil top up paid by the commissioning local authority or school.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a formulaic approach based on the Ranges Model (see appendix 2). The top up funding is allocated to and retained by the school.The HNB’s funding ceases at 31 August 2020. | n/a | n/a | None. | None. |
| **PRUs** (funding provision for pupils permanently excluded).*Note that our PRU provisions are currently in transition and some short term protection arrangements are in place. This table outlines the new funding arrangements expected to be fully in place at 1 September 2020.* *The HNB’s funding of District PRU ceases at 31 August 2020.* | Elements 1 and 2 are combined in a fixed £10,000 per place, based on an agreed number of places to be commissioned.Retained by the PRU.The HNB’s funding of District PRU ceases at 31 August 2020. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges Model (see appendix 2). Proposed to move to a new Day Rate mechanism at April 2020 with some transitional protection arrangements in place up to 31 August 2020.The top up funding is allocated to and retained by the PRU.The HNB’s funding of District PRU ceases at 31 August 2020. | n/a | n/a | No specific additional factors –setting-led need costs are to be covered within the calculation of the Day Rate. | None. |
| **Hospital Education, Tracks and Medical Home Tuition.***Note that the EinH provisions closed as separate PRUs on 31 August 2019. Tracks is scheduled to close as a separate entity on 31 August 2020. Provision is continuing as a single Local-Authority managed central service. Amalgamation will be completed at 1 September 2020.*  | The funding of the centrally managed service will operate outside the Place-Plus mechanism, working within the discrete allocation provided for this service within our HNB. This will be subject to annual review and any changes in our discrete allocation from the DfE.A transitional fixed budget, based on its 2019/20 current place-plus derived allocation, will be delegated to Tracks for the period up to 31 August 2020. | n/a | n/a | n/a | None. | None. |
| **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 only) can be allocated in year where occupancy exceeds agreed places, with an end of year reconciliation to ensure no overall overpayment.Both Elements 1 and 2 are retained by the institution. | Agreed per-pupil top up paid by the commissioning local authority.Allocated in ‘real time’ during the year. Changes for starters and leavers.Bradford currently uses a Ranges 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.Proposed to move to a new Banded Model at April 2020 (see appendix 3) operating on the same principles as now. | None. | None. |
| **Independent Schools** | The place funding system doesn’t operate in independent schools. | Agreed per-pupil top up paid by the commissioning local authority. | The place funding system doesn’t operate in independent schools. | Agreed per-pupil top up paid by the commissioning local authority. | None. | None. |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |  |  |  | **Appendix 2** |
|  |  |  |  |  |  |  |  |  |  |  |
|  | **CURRENT RANGES MODEL - HIGH NEEDS PROVISION: FUNDING CATEGORIES, BANDS & AMOUNTS PUPIL-LED NEED 2019/20**  |
|  |  |  |  |  |  |  |  |  |  |  |
|  | **Range 1** | **Range 2** | **Range 3** | **Range 4** | **Range 5** | **Range 6** | **Range 7** |
| PRIMARY NEED | Delegated Place Funding | Band A (16.5-21.5 hours) | Band B (22-27 hours) | Band C (27.5-34.5 hours) | Band D (35+ hours) |   |   |   |
| **Additional "Plus" Funding** |  |  | **£0** | **£952** | **£3,000** | **£4,597** | **£7,161** | **£10,440** | **£13,910** | **£22,857** |
|  |   |   |   |   |   |   |   |   |   |   |
| Mainstream Autism & SLCN |   |   |   |   |   | SLCN | ASD |   | ASD+ | ASD++ |
| Mainstream MLD/SLD/PMLD |   |   | MLD |   | MLD+ | SLD | PMLD | SLD+ | PMLD+ | PMLD++ |
| Mainstream PD |   |   |   |   |   |   | PD |   | PD+ | PD++ |
| Mainstream HI/VI |   |   |   |   |   | HI/VI |   | HI+/VI+ |   |   |
| Mainstream BESD |   |   |   |   |   |   | BESD |   | BESD+ | BESD++ |
|  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| **Mainstream funding is within colour coded Bands (mainly range 4)** |  |  |  |  |
| **Funding is determined by actual Primary Need and is shown as text** |  |  |  |  |

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

**Appendix 3**

**Proposed new Banded Model for Funding Pupil-Led Need Top Up**

**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 currently allocates this top up funding using a band system. Our current model is attached for reference at Appendix 2. This model is used to assign EHCPs into categories of need for funding purposes. Each range has an applicable level of funding and every EHCP assigned to a range is allocated this set value of funding.

1.3 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 proposed new 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 a child or young person with an EHCP.

1.4 The Local Authority has been working over the past 18 months with the District Achievement Partnership (DAP) on how we can improve the responsiveness of our model. Two limitations of our current model that have been identified are that it allocates funding purely on primary need and can only allocate a single value per EHCP. We believe that a new banded model, which in particular removes the reference to primary need, will result in a more flexible, responsive and accurate system. Our development work with the DAP has evidenced clearly how our EHCP funding system can be improved through this change.

1.5 In continuing to use a banded model, 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 have developed locally an amended banded approach to the funding of the ‘top up’ element for EHCPs, which we propose to adopt from April 2020. If agreed, this new Banded Model will replace our existing Ranges Model.**

* **This change will affect the funding of all existing EHCPs and new EHCPs going forward in all settings, both mainstream and specialist.**

* **It is our intention to use this new model as the vehicle through which to release to providers a significant proportion of the additional High Needs Block funding that is expected to be allocated to Bradford in 2020/21.**
* **The way that we propose to move to the new Banded Model at April 2020 means that all existing EHCPs will see uplift in funding. No existing EHCPs will reduce in value as a result of funding model change.**

**The Proposed New Banded Model**

2.1 The proposed new model will use at its base the [Bradford Matrix of Need](https://bso.bradford.gov.uk/content/send-documentation), 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

\* *Please note that the version of the Matrix currently on BSO (accessed via the link above) includes a Band 3 SEND Support Plus. The funding model does not include this band so, in the funding model, the EHCP band is numbered Band 3 not 4 and EHCP Plus is Band 4 not 5. This mapping difference is currently being looked at, meaning that either the Matrix will be adjusted to match the funding model or the numbering of the bands in the funding model will be adjusted to match the current Matrix. However, this does not affect how the funding model works – the funding model allocates EHCP top up funding only to the top two Bands ECHP and EHCP Plus.*

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 Whereas our current Ranges Model has 7 Ranges with 7 funding steps, our proposed new Banded Model has 6 bands and 6 funding steps, with values for 1 April 2020 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 contribution, 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 Top Up Value at April 2020** | **Element 2 Value FTE the school / provider adds** | **Total Value of Funding to support the EHCP** |
| **Band 3 Low (3L)** | **£1,670** | £6,000 | £7,670 |
| **Band 3 Medium (3M)** | **£3,347** | £6,000 | £9,347 |
| **Band 3 High (3H)** | **£4,974** | £6,000 | £10,974 |
| **Band 4 Low (4L)** | **£7,747** | £6,000 | £13,747 |
| **Band 4 Medium (4M)** | **£11,296** | £6,000 | £17,296 |
| **Band 4 High (4H)** | **£15,051** | £6,000 | £21,051 |

The new 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 2020/21 financial year model, on a term time only basis and incorporating assumptions about on-costs, is £15.63.

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 2020/21 financial year model is £15.63 as in Band 3. The cost per hour assumption for teacher time in the model is £41.18.

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 new 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 To highlight then the main differences between the new proposed Banded Model and the current Ranges Model:

* The new model does not have a 7th step (the equivalent of our current Range 7). It is expected that stacking would deliver a level of support higher than the single band 4H where this is necessary. Specific transition arrangements will be required for current Range 7 EHCPs and transition to the new model is set out further below.
* The Panel can ‘stack’ values (meaning an EHCP can be allocated more than one value) in order to find a close fit.
* The new model does not use primary need as a marker for the placement of an EHCP into a band. Placement is based on level of need.
* Whereas the current Ranges Model defines need in terms of 1:1 hours of support, the new model uses a provision mapping approach and a combination of bespoke time and time in smaller groups.
* The values proposed to be allocated by the new model are increased. The values of the 1st two steps in Band 3 increase the most. The increases are the result of two main adjustments; a) refreshing the assumptions about the salaries of support assistants and teachers - the new model uses estimates of salaries and on-costs for 2020/21; b) allowing the top up model now to compensate for the fixed £6,000 element 2, using the additional resources expected to be allocated by the DfE. Because the £6,000 element 2 has not increased since the implementation of the national model in 2012, the annual increase in the costs of support that results from increased salaries costs must be met by the top up element otherwise there is an annual erosion of funding in real terms. Previously, there has not been sufficient funding in the High Needs Block to adjust for this.
* The new model will work alongside a clarified / amended approach to the sharing of the cost of specialist equipment. This is discussed further in paragraph 9.

2.6 To highlight how the new proposed Banded Model is the same or similar to the current Ranges Model:

* Decisions on the application of the Banded Model – which of the 6 bands a new EHCP is placed in and whether an EHCP is given more than one band value - will continue as now to be taken by Bradford Council’s SEND Panel with reference to the evidence submitted through the EHCP assessment process. Appeals and disputes will 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 16 hours of support a week, which is the same as the current model. The new model itself does not change the threshold at which EHCP funding can initiate nor does it change the points of access to an EHCP. It purely changes the options that are available to the SEND Panel to use to ensure that an EHCP is appropriately and accurately funded.
* The relationships between the 6 steps in the new model (the size of the gaps between them) remain similar to the current model, with the exception of the 1st two steps in Band 3, which are uplifted. However, the ratio of the first step in Band 4 (4L), bottom of specialist, to the final step in Band 3 (3H), top of mainstream, has the same ratio to the current Range 4D, bottom of specialist, compared against Range 4C, top of mainstream. The ratios of the Band 4 values to each other are then the same as Range 4D, Range 5 and Range 6.
* 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 formularise this funding element. We propose to continue this approach in the application of the new Banded Model from April 2020.
* We are not adjusting in 2020/21 notional SEND or SEND Floor arrangements in respect of mainstream formula funding and its relationship with the EHCP model. Adjustment may take place in future.
* We will apply the same ‘technical framework’ as now for the operation of the 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 is currently Range 4D) will become Band 4L. This will fund EHCPs placed in specialist provisions until a final determination of Band from the Panel is received. Funding would be changed at this point if this is different from 4L. Going forward however, we only expect to fund assessment places for new arrivals into the district.

**Implementation / Transition at 1 April 2020**

3.1 The Authority aims to adopt the proposed new model as quickly as possible and to use this as a vehicle to release a proportion of the additional High Needs Block funding that is expected to be allocated to Bradford in 2020/21. The Authority also:

* Will ensure that the values of existing EHCPs will not reduce as a result of model change. This includes being careful to ensure that any protection initially given is not eroded over time.
* Must comply with the requirements of the special school Minimum Funding Guarantee.
* Would like to avoid the complication of running two systems.
* Recognises however, that it does not have the capacity to convert all existing EHCPs from old to new model via an immediate individual assessment but also must avoid disproportionately disadvantaging any sector or type of EHCP through a staggered implementation (where all sectors may not get access to the benefits of the new system, and the uplift in funding this will deliver, according to the same timescale).

3.2 Our proposed transition process is as follow:

* All EHCPs in place at 1 April 2020 will automatically be transferred on to the new system at 1 April 2020 for the purposes of funding top up as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Current**  | Current Value |  | **New Band** | **New Value** | **£ Diff** | **% Diff** |
| **Range 4A** | £952 | **Will become** | **Band 3L** | **£1,670** | **+ £718** | **+ 75.4%** |
| **Range 4B** | £3,000 | **Will become** | **Band 3M** | **£3,347** | **+ £347** | **+ 11.6%** |
| **Range 4C** | £4,597 | **Will become** | **Band 3H** | **£4,974** | **+ £377** | **+ 8.2%** |
| **Range 4D** | £7,160 | **Will become** | **Band 4L** | **£7,747** | **+ £587** | **+ 8.2%** |
| **Range 5** | £10,440 | **Will become** | **Band 4M** | **£11,296** | **+ £856** | **+ 8.2%** |
| **Range 6** | £13,910 | **Will become** | **Band 4H** | **£15,051** | **+ £1,141** | **+ 8.2%** |
| **Range 7** | £22,857 | **Will become** | **Protected 7** | **£24,732** | **+ £1,875** | **+ 8.2%** |

* The values of the steps in the new model for 2020/21 shown in the table above are based on what we expect to fund but are still to be finally confirmed.

* We would expect most existing EHCPs on an on-going basis to remain within the band they have been transferred to. The SEND Panel will 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.
* The new model will work under the guarantee that, for EHCPs in place at 1 April 2020, the EHCP will not ever drop to a lower valued band after the transfer to the new model 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 will remain in place until the pupil reaches the end of year 11. This guarantee does not extend to assessment places funded at 1 April 2020 (as these pupils do not yet have EHCPs).
* All new EHCPs after 1 April 2020 will be funded on the new model without any protection.
* The model going forward will retain a transitional ‘Protected 7’ band, which will continue to fund EHCPs currently graded at Range 7. No new EHCPs will be placed in this band after 1 April 2020. Existing 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 will remain in place until the pupil reaches the end of year 11. At 1 April 2020, the value of Protected 7 is set at 2019/20 plus the % increase for Band 4H, which is currently 8.2%. This ‘Protected 7’ band will continue to be part of the model until there are no more EHCPs left in the system on it. Its value will continue to be uplifted each year by the same value that Band 4H increases by.
* In transferring EHCPs in the post 16 FE sector, we propose to continue the approach set out in paragraph 2.6 and to apply the same principles around the protection of current values as applied for other sectors.

**Appendix 4 – Technical Annex**

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

**Notional SEND (Mainstream Schools Block Primary & Secondary)**

Local authorities are required to define for each primary and secondary school the value of formula funding that is ‘notionally’ allocated for SEND (for meeting the first £6,000 of needs for pupils with EHCPs and the needs of pupils without EHCPs). Our calculation has built up over time. How Bradford 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.

For reference and awareness, there were a couple of issues that were created by our movement to National Funding Formula (NFF) at April 2018 for the calculation of primary and secondary mainstream formula allocations that we identified needed closer attention. These were:

* The knock on implications for our Notional SEND calculation, where our movement to NFF, because of the increased weighting this gives low prior attainment, has meant that the values of notional SEND budget for all schools substantially increased in 2018/19. Following further analysis and benchmarking work, we agreed to continue to use our existing methodology for the definition of notional SEND budgets in 2019/20.
* The knock on implications for our SEND Funding Floor (described in more detail below), where our movement to NFF, because of the increased weighting this gives Additional Educational Needs (AEN), has meant that most schools would not receive SEND Floor funding. We agreed to protect allocations in 2018/19, by guaranteeing that all schools would receive at least the same cash allocation as they did in 2017/18. We agreed to continue this arrangement in 2019/20, whilst identifying that we need to find a better way of calculating additional mainstream SEND funding support now that we have moved to National Funding Formula.

The DfE’s Call for Evidence on the financial arrangements for SEND and alternative provision, conducted in summer 2019, and the DfE’s announcement at the beginning of September of a larger SEND system review, are now important factors in our consideration of our notional SEND and SEND Funding Floor arrangements going forward. For example, the DfE’s Call for Evidence asked specific questions about whether the Regulations should be more prescriptive about how local authorities define notional SEND budgets and provide for minimum levels of SEND funding in mainstream schools. Generally, we are minded not to propose any amendments to our existing notional SEND and SEND Floor arrangements in 2020/21 and until the outcomes of the DfE’s reviews are known. We do not feel that it is productive to potentially implement new arrangements in these two important areas for these to be immediately overridden by new Finance Regulations. As this high needs funding consultation also sets out, we propose changes to the banding model used for funding EHCPs, which will have knock on implications for the SEND Floor in particular. We think it is sensible to have a new model agreed and in place before seeking then to develop and adopt any new Floor mechanism.

**SEND Funding Floor (Mainstream Primary & Secondary)**

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

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

The values of SEND Floor allocations for individual primary and secondary schools and academies are currently protected at 2017/18 cash levels i.e. schools and academies in 2019/20 received at least the value of allocation they have received in 2017/18. We propose to continue to apply this same protection in 2020/21 pending further review (as discussed above).

**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 cannot access de-delegated and centrally managed services without charge – to be set at a flat £393.85 per pupil in 2020/21, which is the 2019/20 value of £364 increased by 8.2% in line with the proposed increases in the main Banding Model values. So a setting with 100 pupils receives 100 x £393.85 = £39,385 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:

 A (75 x £10,000 x 20%)

 B (setting’s place funding x 20%)

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

* Split Sites – an additional sum for schools and academies that operate across split / satellite sites. The full year value of this lump sum is proposed to be enhanced to £198,500 in 2020/21, increased from the 2019/20 value of £162,850. The new value has been calculated taking the original / existing calculation of the additional costs of running across split sites (which was agreed in 2012 and aligned with the mainstream split site formula with a 5.25 weighting a this point) and uplifting this for 2.5% inflation each year to 2020.
* Post 16 Places – an additional sum per Post 16 place, to allocate an additional £1,200 per place increased from £1,100 in 2019/20. 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 2020/21.
* 3% Cash Budget Protection – an additional total cash budget safety net protection, which ensures that at no point during 2020/21 will the total ‘Place Plus’ calculated budget for an individual special school be more than 3% lower than the 2019/20 total level of funding. As most special schools are / have been increasing places, this is not a factor that was needed in 2019/20, 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 FTE x £10,000 x 20%)

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

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

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

**Setting-Led Needs Factors – Early Years Enhanced Specialist Provisions**

* Small Setting Protection – proposed to be added from 1 April 2020 using the School-Led Resourced Provisions formula described above.

**Appendix 5 – 2020/21 Planned Commissioned Places**



**Appendix 6 - RESPONSES FORM**

**Consultation on Funding High Needs Provision 2020/21**

Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Setting Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**THE DEADLINE FOR RESPONSES TO THIS CONSULTATION IS TUESDAY 4 FEBRUARY 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 new Banded Model proposed by the Local Authority as set out in Appendix 3? 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 agree with the transition approach to the new model that is proposed by the Local Authority? 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 3 – Do you have any comments (including technical comments) on the proposed new Banded Model you would like the Authority to consider?**

**Question 4 – 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 5 – Do you have any comments (including technical comments) on the setting-led need factors you would like the Authority to consider?**

**Question 6 – Do you agree with the Day Rate mechanism that the Authority proposes to use to fund the PRUs from 1 April 2020? 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 7 – Do you have any comments (including technical comments) on the proposed Day-Rate mechanism you would like the Authority to consider?**

**Question 8 – Do you agree with the amendments to the approach to the sharing of the cost of specialist equipment that are proposed? 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 approach to the sharing of the cost of specialist equipment you would like the Authority to consider?**

**Question 10: Are there any changes that you would wish to see made to the funding model in 2020/21? Please give details.**

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