

Education Resources Group  
Schools Forum

Meeting Date September 2023  
Meeting Date 4 October 2023

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**Subject: Top Ups for Mainstream : Responses to Consultation**

**Cabinet Member: Cllr Abdullahi**

**Report Number: 6**

**Item: 5c**

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### **Purpose of Report**

1. This report provides a summary of responses received for the proposed local arrangements for funding top ups for pupils with Education, Health and Care Plans (EHCPs) in mainstream schools;

### **Recommendations**

2. The Schools Forum is asked to consider and confirm their agreement to changes recommended in paragraph 6 to the local arrangements for funding top ups for pupils with EHCPs in mainstream schools.

### **Relevance to the Council's Corporate Plan**

3. The Council has an oversight of the Dedicated Schools Grant (DSG) and is responsible for the management and allocation of the funding to all schools in their area. The Council has to ensure the local arrangements are in line with the regulations governing school funding and aim to meet the needs of Enfield's children and young people (CYP).

### **Main Consideration for the Schools Forum**

#### **4. BACKGROUND**

##### **4.1 Current Arrangements**

The arrangements currently in place for funding the top up for CYP with an EHCP were not changed in line with the SEND Code of Practice and are based on an hourly funding model, which requires individual schools to support CYP with SEND up to £6,000. Where the SEND support required is above £6,000 for an individual CYP, the school has to provide a provision map setting out spending over and above £6,000, which includes seeking advice from professionals and the allocation of provision is then calculated with the presumption an EHCP is required.

- 4.1.1 For an EHCP to be considered, the determination is as follows;

$$\text{£}12.33 \text{ per hour} \times 12.5 \text{ hours} \times 39 \text{ weeks} = \text{more than } \text{£}6,000$$

Where the determination indicates cost of support to be above £6,000, the issuing of an EHCP is considered and agreed by the SEN Panel.

If the determination is £6,000 or below, then the CYP does not meet the threshold and an EHCP would not be issued, and the needs of the pupils must be supported by the school.

- 4.1.2 The proposed EHCP with an allocated top-up funding amount is sent to schools for a Formal 15-day consultation. The schools respond stating whether they can or cannot meet need.

- 4.1.3 As part of the annual review of local funding arrangements, schools had stated that the hourly rate of £12.33 used to fund top ups was insufficient. Consequently, over the last couple of

years, the Authority considered how the hourly rate can be adjusted within the current budget constraints and whether the methodology for allocating this funding should be explored should be amended to ensure consistency in allocating funding provided to mainstream schools to support pupils with SEND to be able to achieve their outcomes.

## 4.2 Proposal

4.2.1 The hourly rates and methodologies used by other London local authorities were assessed to consider the most viable options. This resulted in a proposal to increase the hourly rate to £15.50 and move to allocating funding to a banding system. The proposal was discussed with the Education Resources Group, Schools Forum and other key stakeholder groups / networks to seek initial feedback and comments. The comments were assessed, and proposals were amended to reflect the comments received.

4.3 This report provides a summary of responses received and seeks the Forum's views and agreement to a phased approach for implementing the changes during 2023/24.

## 5. SUMMARY OF RESPONSES

5.1 The consultation document was published at the beginning of Summer 2023 term. The deadline for submitting responses was Friday 9 June and by this date 36 responses had been received.

### 5.3 Reponses to consultation

The responses and comments received are attached at Appendix A. In the main, the responses were in favour of the changes being proposed.

Table 1 details the main themes coming from the comments received and the Authority's responses.

**Table 1: Details and impact of hours used for each band**

	Comments	Response
1.	Concern about equity of access for support and whether the changes may restrict access for some pupils, in particular those pupils with high academic capability.	The changes are not designed to restrict access. The Authority is bound by the Code of Practice (CoP) to ensure there is equity in the local processes and procedures for assessing and providing support for CYP with SEND.
2.	The amount of time taken to assess a request for an EHCP; Ensure draft EHCPs are finalised soon after the draft; Reduce the administrative burden for schools of completing a request for an EHCP	This comment is noted and will be considered separately by the Authority.
3.	Clarification on process and allocations for those requests seeking for pupils requiring support on below Band A and those above the upper Band E. Provide funding for those below the threshold of Band A of up to £6,000.	By seeking agreement to these changes, the Authority will work with key stakeholders to confirm any criteria and arrangements for those CYP requiring support below band A or above band B.
4.	The change of the hourly rate to £15.50 and then the average mean to inform the funding to allocated for each band may not be sufficient to cover the full cost of support; If funding was insufficient, then this may impact of the support; Arrangements for uplifting the rates for cost pressures.	The hourly rate of £15.50 is a proxy indicator to inform the calculation of the rates being used for 5 bands. The rate was derived from information obtained from other LAs. Following the full introduction of the change, the aim is to increase the bandings rates to reflect the

	Comments	Response
		average local increase as far as possible received for the Schools and High Needs blocks.
5.	The change to a banding system was seen as positive, but there were concerns if references to hours were still alluded to when considering level of support and in the consequent EHCP;  Consideration be given to other types of support other than TA for the pupils, e.g. Assisted Technology, therapies;  Arrangements for implementing the change.	Noted, we will consider this within the allocation, and will be a focus of our work in the coming year.
6.	There were some concerns whether the thresholds for seeking an EHCP were set at the right level. Also, explanation of each descriptors was too wide and could lead to interpretation, thus creating inconsistencies;  When a request for an EHCP was being assessed, schools be expected to outline how they have supported the pupil from the ordinarily available provision.	As part of the CoP schools and parents need to set out what differentiates the child from mainstream pupils, this can only be shown through differentiation and APDR
7.	Some responses seeking a commitment to fund Section F of the EHCP because of practice in independent schools.	Independent school include care and therapies and therefore an application outside of the EHCP is also required.
8.	Formalise a working party of Headteacher representatives from EPHA and ESHA to support developments in SEND practice.	This comment is noted and will be considered separately by the Authority.
9.	To consider allocation of ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding	This comment is noted and will be considered separately by the Authority.

## Recommendation

6. Based on the responses received it is recommended that:

- Banding descriptors are updated and agreed for supporting pupils below band A and above band E;
- The new process is tested with batches of existing plans from a variety of schools to address any inconsistencies or ambiguities;
- The new process then begins from April 2024 starting with new requests for support and those that are being assessed as part of the annual review process.

Table 2 details the rates included in the consultation for each band.

**Table 2: Details and impact of hours used for each band**

Band	Range of hours of support	Mean value for range of	Per Pupil allocation Current Rate	Per Pupil allocation from November 2023	Per Pupil allocation from September 2024	Difference in funding (£)
A	15 to 18.5	16.75	£2,055	£4,132	£4,339	£2,077
B	18.6 to 22	20.25	£3,738	£6,243	£6,555	£2,505
C	22.1 to 25.5	23.3	£5,204	£8,057	£8,460	£2,853
D	25.6 to 29	27.3	£7,128	£8,897	£9,342	£1,769
E	32.5	32.5	£9,628	£13,635	£14,317	£4,007

## Main Considerations for the Schools Forum and Council

7. The local arrangements for delegating funding to schools are in line with statutory, national and local requirements.

### **Financial Implications**

8. The recommendations in this report will be subject to the resources available.

### **Conclusions and Recommendations**

9. The Forum is asked to consider and confirm their agreement to the recommendation outlined in paragraph 6 to phase the introduction of the proposed changes.

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**Date of report:** September 2023

**Appendices:** None

**Background Papers:**

High Needs funding regulations and DfE operational and guidance documents

Top up funding consultation document and responses

Schools Forum and Education Resources Group reports from previous meetings

## TOP UP FUNDING FOR PUPILS WITH EHCPs IN MAINSTREAM SCHOOLS Summary of Responses to Consultation

In total 36 responses

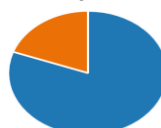
2. Are responding on behalf of an organisation?

● Mainstream School	18
● Mainstream Academy	11
● Other	7



4. Do you agree with the proposal to increase the hourly rate from £12.33 to £15.50?

● Yes	29
● No	7



5. Do you agree with the proposal to move to a prescribed five tier banding system?

● Yes	26
● No	4
● Maybe	5



6. Do you agree with the proposal to use an average mean to inform the hours to be funded for each of the five bands?

● Yes	19
● No	8
● Maybe	8



7. Do you agree with the proposal to include as part of changes discretionary allocation of funding for pupils on SEND support and below Band A?

● Yes	25
● No	4
● Maybe	7



8. Do you agree with the proposal to include as part of changes discretionary allocation of funding for exceptional circumstances above Band E?

● Yes	28
● No	2
● Maybe	6



9. Do you agree with a phased and managed approach to implement the changes?

● Yes	23
● No	9
● Maybe	4





4. Other comments received (in full)

	<b>Comments</b>
1.	SEN cannot be described by sentences and then students need to fit into that particular criteria. We have/had students who are cognitively able but have required exceptionally high levels of support and I fear it is these students that would miss out on the necessary support as they don't fit into set criteria. I also have concerns for a school like Latymer, where we have such a small SEN team due to low numbers, that the allocation of funding would result in students not receiving the necessary support to not only allow them to access education but to safeguard them.
2.	7. Access to Speech & Language is in crisis. ECASS do not offer ongoing support for children so a child with ASD/DLD would have to have an EHCP to receive any SLT. 9. The change needs to be much quicker. We still have plans on the older format which, despite multiple reviews, have not been put on the new format. Additional: Parents need to be told by SEN that this is happening - schools have enough to do without having to take this responsibility on. What will the Delegated Funding sheet look like? Will the hours column be replaced with the banding amount for the child?
3.	Some questions I have after reading the document: How commonly will lower bands be used? Will a "best fit" model be used for the bandings if a child has elements of need in one banding of support and other areas of need in another? Will the way in which plans are written become less prescriptive in terms of allocation of time specifics? The funding band has been written calculating current costs of staff, will this be regularly reviewed in line with increasing staffing costs?
4.	I am concerned that the children needing the higher end of the band funding will not be provided with the correct amount of funding for their provisions, which would mean schools would have to accommodate that. It would be much easier to show the monetary amounts rather than wording.
5.	The proposed changes are positive, my only concern is the average mean for each band. This will mean schools with a large number of children who need a higher amount of provision in each band will not be in receipt of an adequate amount of funding.
6.	Question - why is your new funding based around a model of £15.50 per hour which is different to the £17 per hour quoted on the provision map we complete as part of an EHC needs assessment request?
7.	Highfield primary response to 'Educational funding arrangements (23/24) consultation doc' Positive aspects <ul style="list-style-type: none"> <li>• Banding system can provide greater flexibility to school in using funding for resources/interventions/some dedicated TA, T or independent SALT involvement.</li> <li>• The increase to £15.50 is appreciated, however our cost for a scale 3 SEN TA (with increased pension contributions) is £25,820. This means £15.50 does not cover the true cost of providing a dedicated 1-1 in class (the local authority would need to provide min of £20 per hour). When applying for an EHCP needs assessment, the borough 'cost calculator' references TA cost at £17 per hour with HLTA at £18 per hour, Class teacher £27 and SENCO £29 per hour. This means the LA are recognizing higher costs within an initial application but are still falling short in providing funding to school to meet actual provisional costs.</li> <li>• Banding system Band A will recognise pupils with moderate need (described as being on 5th percentile, approx. 2 years behind their peer group) This will ensure plans are issued for children that might not of been considered to meet criteria in the past, and this will please some parents who have children with a diagnosis of autism who are managing mainstream with adaptations and interventions, but the parent wants the security of an EHCP</li> <li>• Band A and Band B do provide a clear description of pupils typically seen in mainstream (the use of percentile scores is useful considering EP &amp; SALT assessments)</li> </ul> More negative aspects <ul style="list-style-type: none"> <li>• The bands reference 'enhanced hours' but payment will be based on a mean 'average'. This will lead to confusion with parents, so why not just specify the band rather than range of hours of support</li> <li>• The LA have said that only in 'exceptional circumstances' EHCP plans will be issued above band B. BUT we are seeing a significant increase in more complex needs within school (this is a factor the LA cannot really control but their comment reflects their financial position) The banding Band A 16.75 hours (5th percentile, 2 years behind – clear description Band B 20.25 hours (2nd percentile, 3 years behind – a concerning descriptor 'Be highly reliant on an adult for support moving, positioning and personal care' not achievable to provide this high level of support with only band B 'limited enhanced support')</li> <li>Band C 23.3 hours ('Medium level of support' but some descriptions don't reflect this but indicate more severe needs. Specific provision 'Access to a low arousal environment' not possible at Highfield unless attending our ARP (only have 2 KS1 discretionary places for children with autism)</li> <li>'diagnosis of severe/profound sensory impairment impacting on access to the curriculum' a pupil would need more than 'medium level of support'</li> <li>Band D 27.3 hours ('medium/high level of need' many</li> </ul>

	<p>descriptors beyond mainstream specifically 'It is expected that pupils requiring this level of support will experience a combination of substantial or severe difficulty in the areas of communication, cognitive development, behavior, emotional well-being, physical difficulty and/or sensory impairment. They may also have associated difficulties in mobility and acquisition of self-help skills' but the pupil only needs 'medium to high levels of attuned support' Significant provision 'Access to a low arousal nurture group' 'Adult/group size reduced throughout the day' 'reliant on adults for moving, positioning, personal care, individualised eating and drinking' 'room available for emotional regulation where they can calm down') Band E 32.5 hours Clearly at 'special school level' but LA not clearly saying this 'severe trauma' 'all day low arousal sensory environment' 'complex global developmental delay' 'non verbal' 'teaching in reduced group with specialist adult support' most mainstream schools do not have the space, staffing and resources to meet this provision. More funding needed and consultation.</p>
8.	<p>We have entered No for all questions as the proposal is fundamentally flawed. Banding descriptors for Bands C D and E describe a level of provision that could not be met in a mainstream setting. However, the final section on specialist schools states that "pupils who would be eligible to be placed in a specialist setting will not be considered within the remit of the banding system". This is unworkable.</p>
9.	<p>Move to a prescribed five tier banding system (Yes but remove hours from EHCPs as this is difficult to argue with families- just give value or band name) Use an average mean to inform the hours to be funded in each band (yes, but make it clear should additional funding be needed for equipment etc for one off cases, where and how can these payments to cover costs be claimed from? Do you agree with a phased and managed approach to implement the changes? Yes in principle, but should we feel banding is not adequate or appropriate once the child is in setting how can this be rectified or resolved? Current hours system does not seem to be applied consistently, how will this be different? Do we need to modify existing plans to these new descriptors?</p>
10.	<p>£15.50 does not cover staff on costs. The lowest amount we can use is £19.00. We have 38 EHCP's in September and only have 4 LSAs of which 2 are part time. This is due to difficulty with recruitment and limited funds to cover salaries. We are not statutory as we are not able to cover the EHCP requirements because we do not have the staff to do so. Despite the lower bands covering a minimum wage salary you cannot employ someone who needs to be 'highly skilled', as outlined on the EHCP, for this amount of money.</p>
11.	<p>- The funding band in monetary terms is lower than other LEAs. For example, funding Band D in Barnet who use a similar system is £11,500 and C £8500. -The LEA should focus on increasing the threshold for EHCPs, we have student joining who have an EHCP who's support can be met with ordinarily available. It was noted in the meeting that primary schools apply for them to give children a choice of Secondary. This should not be the case. -Schools should be empowered to justify their own costed provision map without the constraints of the £15.50 per hour. At Wren Academy for example, all teachers do at least 1 hour of TAing per term. The benefits for having a subject specialist as your TA for many students is invaluable, however the cost of this would be much than £15.50. -Given that OFSTED's focus is on all teachers being a teacher of SEND and with the over emphasis of funding attached to one child creating a rationale for parents to apply for an EHCP, could the LEA create a system were we apply for grants for ordinarily available support and teacher training.</p>
12.	<p>There should not be an expectation that schools prove spending of £6000 before an EHCP application is considered. Students whose needs fall below Band A should still be considered for an EHCP if they have a specific and long-term need that requires close and consistent monitoring even if additional funding is not required. The wishes of parents of students whose needs fall under Bands D/E should not override the decision of schools if the school can clearly demonstrate that they cannot meet need.</p>
13.	<p>By using a mean average of hours, schools will lose funding on some EHCPs where the hours are greater than the mean. This would have a detrimental impact on the funding available to support children with additional needs. Also £15.50 per hour is less than the cost of a scale 3 LSA due to oncosts, so there would still be a difference between the funding and the cost to schools. Where there is a proposal to change the funding to banding on a reviewed EHCP schools need to be consulted, as often the EHCPs that are reviewed have not been updated since it was originally written and this could lead to a lower banding being given, especially if there are significant changes with a young person, e.g. a new diagnosis.</p>
14.	<p>How regularly will the banding be updated to keep in line with increasing costs, and what process will there be for determining the new banding rates? The banding system will only be effective if kept up to date. It is also very important that annual reviews are kept up to date so that needs are clear. Is there any</p>



	discretionary funding to support schools who are have a higher than average number of children falling at the tops of each funding band and who will therefore be disadvantaged by this system?
15.	I appreciate the increase in the hourly rate of funding, but even with this, we will still be grossly underfunded. For a school with a high number of EHCPs this is crippling! Many children now attending mainstream are extremely high needs and need a high level of support to keep them and the other children safe, we simply cannot afford to provide this for such a high number of children without the total cost of support being provided.
16.	Although we agree that the hourly rate should be increased, the proposal to raise it to £15.50 is not sufficient to cover the cost of provision for children with EHCPs. The hourly rate recommended for calculating the cost of learning support assistance in the EHCP Needs Assessment Request is £17 an hour, which is still less than the actual cost to schools. As of May, despite being 'creative' with support, i.e. the children not receiving the hours on a one to one basis (LSA hours add up to a total of 573hrs 5mins compared to EHCP hours of 756hrs) the additional cost of learning support assistance to the school is £225,323.48 a year, including on costs, supplies etc. Learning Support Assistants do a highly skilled job and deserve a salary that reflects that. It is already difficult to recruit and retain learning support staff due to budget constraints and not being able to increase salary levels. Due to low salaries, applications received are often of low quality or candidates are lacking in essential skills and experience. The cost of releasing staff to complete the necessary level of training is prohibitive. We are strongly opposed to the use of a funding system that is based on mean average. This is intrinsically unfair as schools with more children at the higher end of the band will be significantly disadvantaged compared to schools with more children at the lower end of each band. There could be a huge disparity in need between one end and the other. In our current circumstances, we would be worse off with the proposed banding system than we would with the current funding arrangements. As we have a large number of children with high needs, this is likely to continue to be the case. We are very concerned about the banding descriptors. The descriptors are very often open to interpretation, e.g. 'some difficulty', 'weak', 'generalised support', 'they may need'. They talk about 'access to professionals' and 'school organisation will take account of needs'. We feel that because of this, the problem of inconsistency in provision will continue. The descriptors (and the current provision requirements) do not truly reflect how supporting children with SEN in mainstream primary works. For example, if a child needs a daily 30 minute intervention and allocation of funding is calculated on this basis, what does the child do when that intervention is finished? They no longer have the support, the rest of the class and the teacher are working in the classroom, there are no additional adults or spaces. This is a problem we are frequently encountering. There is mention of 'supported interaction with peers and adults in groups of reduced size throughout the school day'. Where is this intervention going to take place? What if other children don't need the same level of support – will they have to miss out on other learning? We don't believe that the descriptors reflect the level and nature of support that would be required in a mainstream primary for children with the level of need described. For example, Band D (27.3hrs) Physical Difficulties and Sensory Impairment descriptors say that the child is 'reliant on adults for moving, positioning, personal care including eating and drinking, e.g. requiring hoisting. Have a physical disability that creates severe communication difficulties.' In a mainstream environment, where this sort of physical need is rare, a child with this level of need would require full time support at all times for health and safety reasons, so that an adult can be fully responsive to needs and so that a child can be engaging and interacting with others. Also, so that support is not being removed from other children in a class of 30 children all with their own individual needs. We are making provision for children who require specialist settings (agreed by the local authority) who have not been accepted by specialist providers because, in consultation, they have said that they are not able t
17.	The main concern in my line of work is for the autistic pupils who are capable of high academic attainment in certain areas but have a very spiky attainment profile and often cannot achieve well in busy mainstream classes where there is a lot of sensory distraction, limited modification of learning materials and no processing time given for them to grasp what is being taught or asked of them. Some of this should be OAP but in reality, schools need additional resources to enable these conditions to be met. Without this, these students have significant mental health difficulties and are under-achieving FOR THEM. They may not be behind peers in areas of strength but they are not able to achieve to their ability. The current system seems to fail these students. Perhaps band A funding could cater for these needs.
18.	I only support these arrangements for banding on a transitional basis based on the following: a commitment to fund section f of the EHCP in full by September 2024 as is the practice with independent

	<p>schools. To provide a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. To provide a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. To provide a solution for ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding. Wider issues EHCPs to be finalised rather than left in draft form within 12 weeks of the draft being circulated LA to commit to revising the processes and timelines for applying for EHCPS with the goal of reducing work-load for school based colleagues eg LA the paperwork that is required by Enfield which is onerous on SENCOs: it is not a statutory requirement to present paperwork in a particular format. LA to formally establish a working party consisting of HT Representatives from EPHA and ESHA who meet regularly with LA Officers to support steering developments in SEND practice. LA to review distribution of EHCPS amongst secondary schools to ensure more equitable distribution amongst schools I would hope that we can work together to agree a more streamlined and time efficient way of proceeding. Provision There is also a need to review what is meant by provision rather than it simply being linked to LSA/TA hours as there as many other ways in which to support students such as assisted technology and more specialist support rather than generalised LSA/TA support. For example, some students would benefit from being able to see a physiotherapist once a week rather than doing physiotherapy exercises with an LSA who is neither trained nor experienced to do so. Similarly, there are students who would benefit from a weekly or bi-weekly time with a speech and language therapist / assistant rather than a generalised reference to language groups in section f which LSAs are not always knowledgeable enough or experienced enough to deliver. There is also evidence that students with SEND benefit from High Quality Teaching and the amount quoted would not pay for a SEND teacher. I would hope that a review of provision would be discussed with the working party.</p>
19.	<p>I only support these arrangements for banding on a transitional basis based on the following: A commitment to fund section f of the EHCP in full by September 2024 as is the practice with independent schools. To provide a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. To provide a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. Wider issues EHCPs to be finalised rather than left in draft form within 12 weeks of the draft being circulated LA to commit to revising the processes and timelines for applying for EHCPS with the goal of reducing work-load for school based colleagues eg LA the paperwork that is required by Enfield which is onerous on SENCOs: it is not a statutory requirement to present paperwork in a particular format. LA to formally establish a working party consisting of HT Representatives from EPHA and ESHA who meet regularly with LA Officers to support steering developments in SEND practice. LA to review distribution of EHCPS amongst secondary schools to ensure more equitable distribution amongst schools - I would hope that we can work together to agree a more streamlined and time efficient way of proceeding. Provision There is also a need to review what is meant by provision rather than it simply being linked to LSA/TA hours as there as many other ways in which to support students such as assisted technology and more specialist support rather than generalised LSA/TA support. For example, some students would benefit from being able to see a physiotherapist once a week rather than doing physiotherapy exercises with an LSA who is neither trained nor experienced to do so. Similarly, there are students who would benefit from a weekly or bi-weekly time with a speech and language therapist / assistant rather than a generalised reference to language groups in section f which LSAs are not always knowledgeable enough or experienced enough to deliver. There is also evidence that students with SEND benefit from High Quality Teaching and the amount quoted would not pay for a SEND teacher. I would hope that a review of provision would be discussed with the working party.</p>
20.	<p>In general We disagree with the principle that schools with above average numbers of EHCPs should receive £6k for each child above the Borough average. This is illogical as it takes no account of need. The Borough should move towards an across-the-board increase in the notional funding so there is equity across the Borough. We only support these arrangements for banding on a transitional basis based on the following: • a commitment to fund section F of the EHCP in full by September 2024 as is the practice with independent schools. • to provide a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. • to provide a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. • to provide a solution for ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding. Wider issues EHCPs to be finalised rather than left in draft form within 12 weeks of the draft being circulated. There is no good reason why the process should normally take in excess of this. The LA should publish statistics setting out the timescales and establish KDIs to improve the current timings. The LA</p>

	<p>needs to commit to revising the processes and timelines for applying for EHCPs with the goal of reducing workload for school-based colleagues e.g. LA the paperwork that is required by Enfield which is onerous on SENCOs: it is not a statutory requirement to present paperwork in a particular format. DfE is proposing an on-line application process and we would support being 'early adopters' of such a process. The LA would benefit from formally establishing a working party consisting of HT Representatives from EPHA and ESHA who meet regularly with LA Officers to support steering developments in SEND practice. The objective is to reduce the bureaucracy that inhibits the efficient use of public money and ultimately the welfare and progress of children. This should be the stated aim. Provision There is also a need to review what is meant by provision rather than it simply being linked to LSA/TA hours as there as many other ways in which to support students such as assisted technology and more specialist support rather than generalised LSA/TA support. The current system of hours can lead parents to believing that their child will be getting 1:1 support which is not the case nor good practice. It would also fit better with a funded provision model.</p>
21.	<p>I only support these arrangements for banding on a transitional basis based on the following: a commitment to fund section f of the EHCP in full by September 2024 as is the practice with independent schools. To provide a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. To provide a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. To provide a solution for ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding.</p>
22.	<p>for me the big issue who writes section F of an EHCP and who funds it. This needs to be discussed and agreed.</p>
23.	<p>I only support these arrangements for banding on a transitional basis based on the following: a commitment to fund section f of the EHCP in full by September 2024 as is the practice with independent schools. To provide a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. To provide a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. To provide a solution for ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding. Wider issues EHCPs to be finalised rather than left in draft form within 12 weeks of the draft being circulated LA to commit to revising the processes and timelines for applying for EHCPs with the goal of reducing workload for school based colleagues eg LA the paperwork that is required by Enfield which is onerous on SENCOs: it is not a statutory requirement to present paperwork in a particular format. LA to formally establish a working party consisting of HT Representatives from EPHA and ESHA who meet regularly with LA Officers to support steering developments in SEND practice. LA to review distribution of EHCPs amongst secondary schools to ensure more equitable distribution amongst schools I would hope that we can work together to agree a more streamlined and time efficient way of proceeding. Provision There is also a need to review what is meant by provision rather than it simply being linked to LSA/TA hours as there as many other ways in which to support students such as assisted technology and more specialist support rather than generalised LSA/TA support. For example, some students would benefit from being able to see a physiotherapist once a week rather than doing physiotherapy exercises with an LSA who is neither trained nor experienced to do so. Similarly, there are students who would benefit from a weekly or bi-weekly time with a speech and language therapist / assistant rather than a generalised reference to language groups in section f which LSAs are not always knowledgeable enough or experienced enough to deliver. There is also evidence that students with SEND benefit from High Quality Teaching and the amount quoted would not pay for a SEND teacher. I would hope that a review of provision would be discussed with the working party.</p>
24.	<p>I would like to see a commitment to fund section f of the EHCP in full by September 2024 as is the practice with independent schools. I would like to see in place a mechanism for applying for funding for children under 'Band A' (up to £6000, who may not require an EHCP) to deliver early intervention. I would like to see a mechanism for applying for exceptional funding above 'Band E' for children whose provision requires additional funding. I would like to see a solution for ARP and Unit funding to ensure that the timing of admissions does not affect the school's funding.</p>