

Dedicated Schools Grant engagement survey

Contents

1. Background.....	2
2. Survey response rate and characteristics	4
3. Survey results: Existing programmes of work.....	4
3.1. Theme A: Expanding Specialist Provision	4
3.1.1. Question 1: Are there any potential opportunities that are missing within theme A that would secure better outcomes but also be sustainable?	5
3.1.2. Theme A: Response from Bristol Parent Carers et al.....	6
Bristol Parent Carer Forum et al. had the following response to theme A:	6
3.2. Theme C: Inclusion Practice in Schools and Settings	7
3.2.1. Question 2: Are there any potential opportunities that are missing within theme C that would secure better outcomes but also be sustainable?	8
3.2.2. Theme C: Response from Bristol Parent Carers et al.....	8
3.3. Theme D: Commissioning Frameworks	9
3.3.1. Question 3: Are there any potential opportunities that are missing within theme D that would secure better outcomes but also be sustainable?	10
3.3.2. Theme D: Response from Bristol Parent Carers et al.....	11
4. Survey results: New proposed programmes of work	11
4.1. Theme B: Non-Statutory Top Up and Early Intervention.....	11
4.1.1. Question 4: In respect of Theme B: Non-Statutory Top Up and Early Intervention, do you think we have identified the right theme to focus on?	12
4.1.2. Question 5: Do you agree or disagree with the theme B proposals?	15
4.1.3. Question 6: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?	17
4.1.4. Theme B: Response from Bristol Parent Carers et al.....	17
4.2. Theme E: Specialist Place Funding.....	19
4.2.1. Question 7: In respect of Theme E: Specialist Place Funding, do you think we have identified the right theme to focus on?.....	19
4.2.2. Question 8: Do you agree or disagree with proposal E1?.....	20
4.2.3. Question 9: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?	20
4.2.4. Theme E: Response from Bristol Parent Carers et al.	21
4.3. Theme F: Post-16 Funding	22
4.3.1. Question 10: In respect of Theme F: Post-16 Funding, do you think we have identified the right theme to focus on?	22

4.3.2.	Question 11: Do you agree or disagree with the theme F proposals?	23
4.3.3.	Question 12: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?	24
4.3.4.	Theme F: Response from Bristol Parent Carers et al.	25
4.4.	Theme G: Alternative Learning Provision (ALP).....	25
4.4.1.	Question 13: In respect of Theme G: Alternative Learning Provision (ALP), do you think we have identified the right theme to focus on?	26
4.4.2.	Question 14: Do you agree or disagree with proposal G2?	26
4.4.3.	Question 15: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?	27
4.4.4.	Theme G: Response from Bristol Parent Carers et al.....	27
	Other themes.....	28
4.4.5.	Question 16: Are there any potential themes you think are missing? What are they?28	
4.4.6.	Other comments from Bristol Parent Carers et al.	28

1. Background

Here in Bristol, the overspend on the High Needs Block budget (i.e., the funding that supports provision for pupils and students with SEND) has been increasing year-on-year to the point at which it has become unsustainable. The forecast deficit for the current financial year is approximately £44 million. Other areas face similar challenges, and the Department for Education is delivering some intervention programmes to assist local authorities with deficits to achieve high needs spend sustainability.

The steep increase in deficit is due to mainly to increased demand for Special Educational Needs provision. The main cost drivers are:

- The rise in demand for Education, Health and Care plans (EHCPs) following national reforms from 2014
- Increasing complexity of children's needs
- The rising costs of out of authority placements.

Demand continues to increase and despite additional funding from the Department for Education, it has not been possible to recover the deficit which began to accelerate in 2019/20.

Any local authority that has an overall deficit on its Dedicated Schools Grant (DSG) account at the end of the 2021 to 2022 financial year, or whose DSG surplus has substantially reduced during the year, must co-operate with the Department for Education in handling that situation through the DSG management plan.

The plan is intended to help Local Authorities to develop evidence-based and strategic plans covering the provision available for children and young people with

special educational needs and disabilities. Completion of the Plan will enable us to comply with the Department for Education requirement in Paragraph 5.2 of the Condition of the DSG Grant.

The indicative mitigations outlined are the next phase in the development of the DSG management plan. Before progressing with many of the mitigations, further engagement and consultation is required to inform the next iteration of the plan.

The development of this work has been informed by the [Department for Education's research report on effective management of High needs budgets in local authorities](#). This research focuses on 10 local authorities that are seen to be managing their high needs budgets more effectively, with the intention of identifying positive practice that can be transferred to other areas. The recommendations detailed in the report are grouped under these key headings:

- Capacity
- Partnership Culture
- Developing Local Provision
- Funding Approaches

In Bristol we have built on these four areas to develop a set of themes that will underpin the financial sustainability work we need to do:

- Theme A: Expanding Specialist Provision
- Theme B: Non-Statutory Top Up and Early Intervention
- Theme C: Inclusion Practice in Schools and Settings
- Theme D: Commissioning Frameworks
- Theme E: Specialist Place Funding
- Theme F: Post-16 Funding
- Theme G: Alternative Learning Provision (ALP)

Bristol City Council sought engagement on the proposals laid out in the Indicative Dedicated Schools Grant Mitigations Plan. A report on these proposals was presented to Bristol Schools Forum on Tuesday 27 September 2022. Bristol Schools Forum approved the council's recommendation that the Indicative DSG Mitigation Plan progress to a 6-week engagement period with wider stakeholders to help shape and inform the proposed mitigations ahead of a formal consultation exercise.

The Dedicated Schools Grant Mitigations Plan includes **existing** proposals as well as some **new** proposals. Themes A, C and D are existing proposals. Themes B, E, F and G are new proposals. Consultation has already been undertaken for existing proposals where appropriate, for example, Commissioning Frameworks. New proposals will be informed by the engagement period and those requiring a full consultation will be identified accompanied by a full options appraisal.

The period of engagement sought views on the themes that underpin the current Dedicated Schools Grant Mitigation Plan, asking whether stakeholders think these are the right themes, and whether there any additional themes that could be included. The Dedicated Schools Grant engagement survey was available on the

council's Consultation and Engagement Hub (www.ask.bristol.gov.uk/dedicated-schools-grant-engagement) between 20 October and 22 November 2022.

2. Survey response rate and characteristics

32 people submitted responses to this engagement survey.

Respondents were asked to describe their situation. They answered as follows:

- 46% Bristol SENDCo
- 23% Bristol Head teacher - Primary school
- 4% Bristol Head teacher - post-16
- 4% Bristol Head teacher – other (e.g. ALP)
- 4% Bristol Governor
- 4% Bristol Schools Forum or Working Group representative
- 15% selected “Other” - the “other” situations are:
 - SENDCo in conjunction with Head teacher
 - Further Education College
 - Trust SEND staff
 - Former School Forum representative
 - Former representative of a specialist MAT

Respondents were asked to complete equalities monitoring questions, however due to the relatively small number of respondents and the survey being completed in a professional rather than personal capacity, they have not been included in this report.

We also received a response prepared by Bristol Parent Carers in partnership with Autism Independence, Bristol Autism Support, National Autistic Society, Bristol EHCP Experiences Group, The Family Centre (Deaf Children), and Nothing Special.

3. Survey results: Existing programmes of work

3.1. Theme A: Expanding Specialist Provision

Theme A is about reducing the reliance on and placements in independent non-maintained schools (including out of authority) by increasing the availability and suitability of local provision.

Increasing the number of specialist places in the city was a priority within the Written Statement of Action (WSOA) resulting from the previous Local Area Inspection. The places are being created to ensure there are sufficient places locally to meet the needs of children and young people with SEND and ensure they are educated as close to their home and community as possible. Work has progressed and is on track to deliver 450 additional places by 2024.

Proposals for theme A:

A1: Specialist Provision

Create 330 specialist places in special and mainstream schools to meet current and future projected demand.

A2: Capital Investment in Existing Specialist Settings

Expand and modernise existing special school provision to create an additional 108 specialist places (contributes 450 places committed through Mayoral Pledge).

A3: Expansion of Supported Living (Project Rainbow)

To build a 12-bed education residential centre to support preparation for adulthood.

3.1.1. Question 1: Are there any potential opportunities that are missing within theme A that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities missing within **theme A**.

17 respondents answered this question. Their comments are summarised below:

- Broader range of specialist provision
- Smaller local resource units based within schools
- Specialist provision/ALP in Early years and KS1
- Specialist places need to be linked to specialist provision
- Schools should be made more energy efficient
- Expand specialist provision to incorporate additional resource base places in primary schools
- More resource base provision in secondary schools
- More needs to be done for transition from KS2 to KS3
- Mainstream schools need to offer inclusive provision

- Resource bases need to be a blended pathway in which children can be included in quality-first teaching in mainstream provision.
- School for the blind
- Expansion of specialist placements to release funds spent on ALP provision
- Age range not always suitable for younger children
- A directory of specialist provision within the city showing facilities offered and age range
- Small clusters of mainstream schools with a specialist resource base between them
- Expansion of the specialist provision in mainstream should also include Further Education Colleges
- Include resource bases in primary schools which are fully funded, staffed and resourced within existing school buildings.
- Consider cognition and learning need of those with high-functioning Autism Spectrum Conditions (ASC)
- Ensure there is specialist provision for pupils who have ASC with a Demand avoidant profile but are academically able
- Special schools to review progression options for learners to access post-16 provision at age 16 rather than 19 to free-up spaces
- Post-16 providers to review provision and consider delivering a school link programme
- Review school buildings to see if existing buildings can be converted to have resource bases which are staffed and resourced as specialist provision
- Ensure Bristol schools allocate places to Bristol applicants

3.1.2. Theme A: Response from Bristol Parent Carers et al.

Bristol Parent Carer Forum et al. had the following response to theme A:

More schools locally is a fantastic idea as no one wants their child or young person to start their day with a 60-minute taxi ride. However, simply providing more spaces will not be the answer to reducing the number of families requesting INM placements. Please see the comments below for further details:

- It is essential that anything created locally really is suitable for the needs of children and young people in the community (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- The ALP [review](#) findings need to be considered alongside the ALP [improvement](#) plan (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- 450 places are planned but is that sufficient? The [Integrated Education & Capital Strategy](#) (2015-2019) at page 12 references a projected shortfall of 128 specialist places (12%) across all need types and ages come 2019, that was before covid and even though this was predicted it was not prevented. How can we get this right? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch) & Bristol Autism Support)

- How will shortfalls in the East Central areas of Ashley, Easton and Lawrence Hill and parts of Lockleaze, St George West and Eastville be addressed? (View supported by Bristol Parent Carers)
- What are INM schools providing that is needed, and which local schools are not?
- Parents can't select schools at will, the law says it has to be a suitable school with efficient use of resources so the need must be there to warrant these placements.
- More spaces is a simplistic view as it's not that straightforward. (View supported by Bristol Parent Carers)
- Should BCC be looking to create lots of mini schools (like the Belgrave model) rather than super-sized specialist settings? Or looking at what cheaper INM settings deliver and if duplication of that could meet the needs of children and young people in Bristol. (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch) & Bristol Autism Support)
- Post 16 provision will need careful consideration, what work has gone into understanding INM placements and post-16 needs? (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- Academic options for children who can do more than a handful of GCSEs are lacking and this has been identified in many previous reports commissioned by BCC (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- On-site therapists / ICB training for staff, often this is a driver for INM schools, will such services be available in the new settings BCC are planning? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- Can BCC keep an active list of schools and places available to speed up the consultation process during EHCP and so that parent carers know which schools to look at during the EHCP process? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch) & Bristol Autism Support)
- Given that this consultation is focussed on the reduction of the HNB overspend what is the Net effect of this initiative on HNB over the next 1-5 years? (View supported by National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)

3.2. Theme C: Inclusion Practice in Schools and Settings

Theme C is about supporting and driving mainstream schools to meet a higher level of need, in a more cost-effective way whilst improving the quality of provision.

The development of a training and development offer to all education settings was also a focus within the WSOA, including the development of what is ordinarily available within schools. There is now a training and development programme in place for the sector to improve the quality of inclusive practice in schools and settings. Funding for the Belonging in SEND programme has just begun, following approval of funding from Schools Forum, to develop evidenced-based interventions in schools and settings to reduce suspensions and exclusions of pupils with SEND.

There is an assumption that improvements in inclusive practice and more effective use of Element 1 and Element 2 funding will ensure appropriate early intervention, reduce escalation of need and have a positive impact on outcomes for children and young people.

Proposals for theme C:

C4: Belonging with SEND Programme.

Using the funding allocated by Bristol Schools Forum, the programme aims to reduce the number of exclusions in Bristol and improve attendance and attainment of children with SEN. The programme will do this by supporting schools/settings to deliver sustainable evidence-based interventions, improve skills and knowledge, and pilot the use of specialist equipment.

C5: Workforce Development Plan and Delivery.

The Bristol Local Area to have a well-trained workforce, able to identify and respond to need at the earliest point.

C6: School Improvement offer for SEND.

To develop the School Improvement offer for schools (utilising recent redeployed staff) to focus on improving provision at the school-based stages of the Code of Practice.

3.2.1. Question 2: Are there any potential opportunities that are missing within theme C that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities missing within **theme C**.

19 respondents answered this question. Their comments are summarised below:

- Access to professionals to advise and support the workforce
- Temporary contracts are causing recruitment and retention difficulties
- School improvement offer is a bureaucratic and expensive layer
- More front-line workers rather than top-down heavy model
- Provision of resources and adaptations to school buildings to meet complex needs
- Create a library of specialist resources that schools could share/trial before committing to buying
- More funding to mainstream schools for 1:1/small group support
- Inclusive schools are being forced to take pupils that should not be in a mainstream setting
- Driving staff away from mainstream schools
- Need better access to specialist support
- Inclusion needs to be better funded
- EHCPs need to come with a pot of money
- Need better access to specialist support

- There should be a high level of inclusive provision in every school
- Needs to be an actual SENCO in every school
- Need to take in students who have previously been excluded

3.2.2. Theme C: Response from Bristol Parent Carers et al.

Bristol Parent Carer Forum et al. had the following response to theme C:

We welcome the approach that schools will be encouraged to meet higher levels of need but we are concerned that this will lead to inappropriate placement for some learners, the potential diminishing of parental preference in accordance with SEND Regs and would like more information on how this will be prevented and longer waits for EHCPs under the guise of school “should be able to manage it”.

Furthermore, it is not clear from this proposal exactly how BCC can support schools to take these steps. Especially given the white paper and widespread academisation of schools and changes to approach in behaviour and exclusions.

- Has there been any work to understand why BCC feels schools feel unable to meet the needs of Children and Young people and what support can be offered to them? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- We need to empower parents to challenge this when schools don't implement support as advised - particularly with lower levels of need - how best to do this? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- There needs to be more emphasis on listening to what parents say and not waiting x weeks or years to hear the same thing from a professional - there needs to be a change at school level as well as within BCC. Often families tell us their views were not heard during the EHCP process. But parents will need to be informed of their rights, how to exercise them and be able to access support in doing this if they need it. (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)

3.3. Theme D: Commissioning Frameworks

Theme D is about improving the efficiency of commissioning SEND provision and services to deliver best value.

The Therapies Framework was published in July 2022. The aim of the new framework is to ensure therapies, mainly associated with Education, Health and Care Plans, are appropriate and reach quality assurance standards. Implementation of a 'Preferred Provider List' model is estimated to deliver efficiencies compared to the previous procurement approach. A similar approach is also in progress for the commissioning of Alternative Learning Provision.

We have the following proposals for theme D:

D2: Therapies Framework

The aim is to ensure therapies mainly associated with Education, Health and Care

Plans are appropriate and reach quality assurance standards. Implementation of a Preferred Provider List model is estimated to deliver a 10% reduction in spend per year over 5 years when compared to the previous procurement approach.

D3: ALP Commissioning Framework

To ensure that children and young people's needs are met by receiving Alternative Learning Provision which has been quality assured and is commissioned through a framework. The new contract is able to limit price increases from providers.

3.3.1. Question 3: Are there any potential opportunities that are missing within theme D that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities missing within **theme D**.

15 respondents answered this question. Their comments are summarised below:

Comments about ALP:

- ALP in Bristol should be run by the Local Authority.
- Have an ALP in each cluster so children don't have to travel across the city.
- Coordination and support for schools to enable swift access to ALP.
- Ensuring that the profile of pupils going to ALP is consistent across schools.
- ALP costs are extremely expensive and D3 is welcomed.
- Further investigation is needed to determine effectiveness of EIB.
- Linking ALP placements with next progression routes at Post 16.

Comments about Preferred Provider List:

- Concerned that Preferred Provider list may not be able to meet demand across city.
- Preferred Provider List model could lead to higher long-term costs as the market will be less competitive.

Other comments:

- EHCPs are taking a long time to complete.
- Focussing on children who do have statutory provision via an EHCP misses the point if significant weight is not put on the provision being given to children who are on SEN support, who are going through the graduated response, who have high needs but who have come from a different local authority and may not therefore have funding.
- Consider simplifying the commissioning process.
- Supports aims of proposal.
- Too often an EHCP is written and then the school's SENDCo must complete a top up application having researched and found the intervention/resources that are needed to be able to deliver this.
- CCGs need to invest more in the prevention and treatment of children and young people with mental health needs.

3.3.2. Theme D: Response from Bristol Parent Carers et al.

Bristol Parent Carer Forum et al. had the following response to theme C:

We welcome efficiency in ensuring therapists can quickly and easily contribute (primarily) to EHC needs assessments and presumably ongoing therapy work.

- Is it not clear from these recommendations how any money will be saved or what would happen should a therapist from this list not be available / not be able to offer advice on the needs of specific children? (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- It would be beneficial for parents and carers to also be provided with the 'Preferred Provider List', this will mean families that would like to seek independent advice are using a therapist that is compliant with BCC standards. This would mean some families would not have to wait so long for the EHCNA/P to be processed. (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- This list was not co-produced and there may be concerns from some in the community that such a list may have been put in place to minimise need. Co-production alongside parent carers would provide some reassurance for families that this model is in their best interests. (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- Will members of this list be available to deliver support in schools which will help with the aims of Theme A. (View supported by Bristol Parent Carers & Bristol Autism Support)
- Whilst Commissioning Frameworks and Preferred Providers are a common model in many organisations, they are hugely complex to develop and monitor and can lead to a lack of successful provision - especially when the PP fails to staff the function adequately or recruits less skilled practitioners. Reduction in quality is also common because, even when failings are identified, long-term contracts are difficult and expensive to change. Significant failures have been identified with several large outsourcing companies over the last few years so it is vital to subject any proposal to very extensive and detailed scrutiny including discussions with any other Authorities who have used these PP, in particular those who are not suggested by the PP as reference sites. (View supported by National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support).

4. Survey results: New proposed programmes of work

4.1. Theme B: Non-Statutory Top Up and Early Intervention

Theme B is about reviewing the effectiveness of notional SEND budget in schools and ensuring that non-statutory top up funding to mainstream schools is robust, appropriate, time-limited and impactful.

Bristol is one of small handful of local authorities continuing to offer non-statutory top up funding. The funding supports the school-based stages of the SEND Code of Practice and is to fund short term early intervention for one to three years. The funding is for those CYP who are accessing ordinarily available provision (OAP) but may need short term additional intervention as specific gaps in their progress have been identified through the assess, plan, do review process.

Over the last few years, top-up funding has moved away from this targeted, clear approach and the number of applications has significantly increased. A review of the top-up process will help us to understand how funding is utilised and the impact on outcomes for CYP. With the introduction of OAP guidance and training, inclusive practice should be more effective at utilising Element 1 and 2 funding to support need.

We have the following proposals for theme B:

B1: Review of HNB Element 3 Non-Statutory 'top-up' Funding

To conduct a review of existing Non-Statutory Top-Up process where schools can apply for funding to support additional needs without having to request an Education, Health and Care Needs Assessment.

B2: Needs Matrix for Non-Statutory Top Up Funding Application

The new process will use a web-portal and be more transparent and equitable about how non-statutory top-up funding is calculated and allocated. There is potential to extend the Matrix to statutory funding.

4.1.1. Question 4: In respect of Theme B: Non-Statutory Top Up and Early Intervention, do you think we have identified the right theme to focus on?

Respondents were asked whether **theme B** was the right theme to focus on.

29 respondents answered this question.

- 48% agree or strongly agree
- 31% disagree or strongly disagree

In respect of Theme B: Non-Statutory Top Up and Early Intervention, do you think we have identified the right theme to focus on?

Answer Choices		Response Percent	Response Total
1	Strongly agree	3.45%	1
2	Agree	44.83%	13
3	Neither agree nor disagree	20.69%	6
4	Disagree	17.24%	5
5	Strongly disagree	13.79%	4

15 respondents responded to the question “If you selected Disagree or Strongly Disagree, can you explain why?”. The following points were raised in their responses:

- In context of shrinking budgets, the constant drive by local authorities to find efficiencies and savings is putting pressure on teachers and schools and is not a sustainable model.
- Reason for increased applications is an increase in children presenting complex needs.
- More collaboration with schools and teachers is needed to understand the current situation.
- The paperwork needed to access funding is already very difficult and the amount of money that does not actually cover the cost of the support worker.
- Applying every year rather than 3 years wastes SENCos time.
- When an EHCP is issued this should automatically have funding attached to it that meets the provision set out.
- The notional budget is not appropriate for level of need at schools.
- Non-statutory funding in the early years is vital.
- Already struggling to get requests for EHCs through due to lack of support and long waiting lists.
- Not happy that money is being taken away from most in need children.
- Poor communication and support between local authority and schools.
- Better access to health care and provision early on will reduce need for top up.

- It would strongly support SENDCos if the local authority could work with heads to ensure that the notional budget in Element 2 is available for spending on SEND.
- SENDCos and SEND departments are not able to deliver additional intervention and support without applying for Top-Up.
- Accountability within system is needed.
- Removing non statutory top up will increase number of EHCP applications.
- It should not only be available in schools - sometimes learners join FE without having had a statutory assessment but with support needs identified.
- Current model relies too heavily on SENDCos paperwork. Instead SEND should have more of an active role in face-to-face collaboration to decide funding needed for children.
- Currently, the demands on school budgets have meant that schools are unable to afford to employ general LSA staff who would have traditionally sorted out low level issues before they escalated.
- More specialist places for high needs pupils are required.
- Learners find it challenging to move from the school setting to a more mainstream Post 16 provision without support in place.
- OAP does not consider how many children with additional needs are now in mainstream.
- More inclusive schools have higher strain on budgets as they take on more children with SEN.

4.1.2. Question 5: Do you agree or disagree with the theme B proposals?

Respondents were asked whether they agreed or disagreed with the **theme B** proposals:

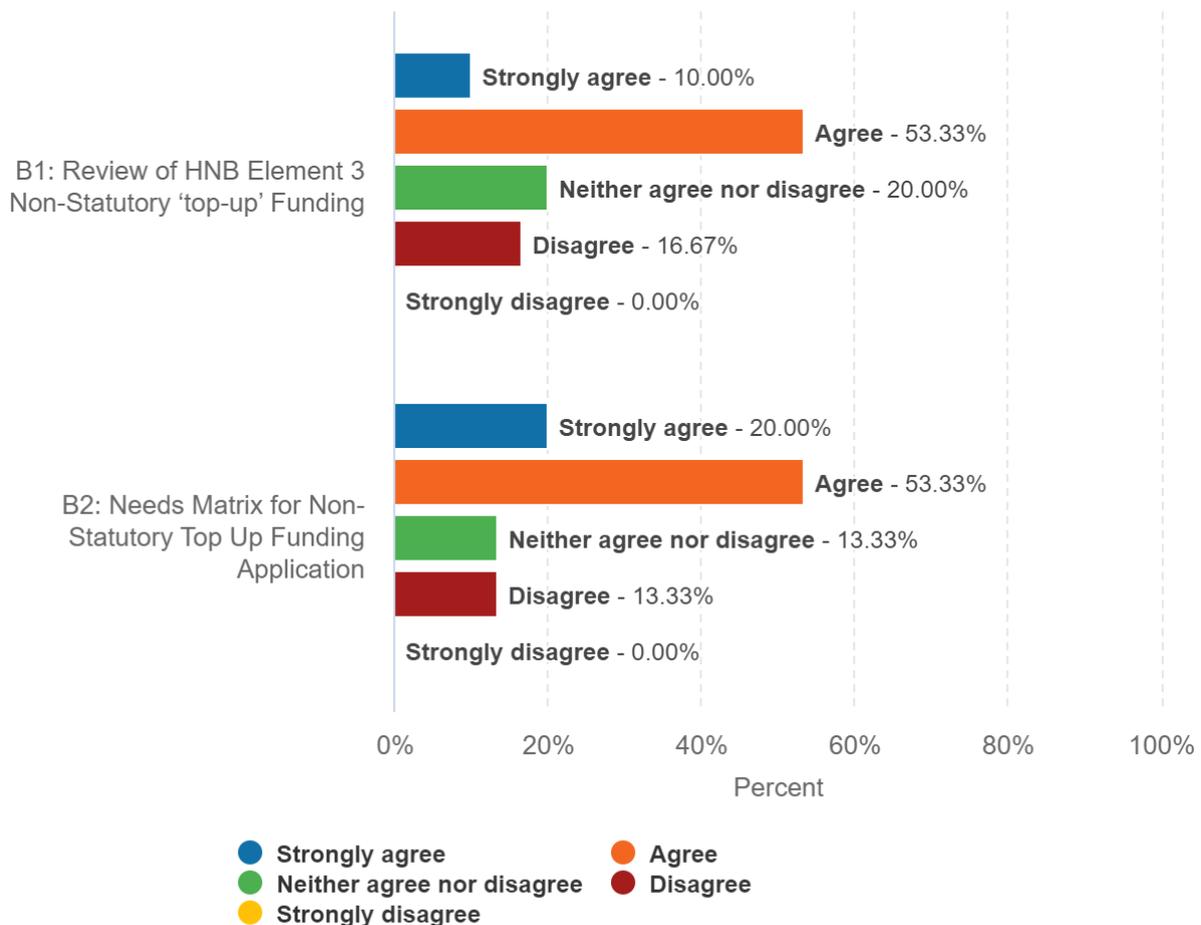
B1: Review of HNB Element 3 Non-Statutory 'top-up' Funding: To conduct a review of existing Non-Statutory Top-Up process where schools can apply for funding to support additional needs without having to request an Education, Health and Care Needs Assessment.

- 63% agree or strongly agree
- 17% disagree or strongly disagree

B2: Needs Matrix for Non-Statutory Top Up Funding Application: The new process will use a web-portal and be more transparent and equitable about how non-statutory top-up funding is calculated and allocated. There is potential to extend the Matrix to statutory funding.

- 73% agree or strongly agree
- 13% disagree or strongly disagree

Do you agree or disagree with the theme B proposals?



17 respondents commented on the **theme B** proposals. The following points were raised in their responses:

- A needs matrix could provide a more consistent approach to funding applications.
- Agree that the process needs to be more transparent and fairer
- Concerned that review is about cuts and making schools do more for less.
- Does not believe a matrix process is the right solution.
- Matrix system does not account for individual circumstances and changing needs.
- This proposal will worry schools.
- Does not want Top Up for children without an EHCP stopped.
- The current model does not cover the costs of provision due to the cap on funding and 25 hours. It is a contribution to the costs, but it often falls short.
- Why is this only applicable to schools.
- Communication from local authority has been poor in respect of time frames of funding stopping.
- There should be a review, but one done which considers the true cost of SEN to schools.
- The issue with the new funding system could be that the true cost to schools of the child is not accounted for. OAP provisions are not accounted for and therefore the cost is not a true reflection of the total spend on a child or of a school in general.
- Funding cannot be removed until a clear process has been agreed and does not leave children without funding.
- Not enough clarity around Top Up.
- If schools access top-up funding without the need to apply for an EHCP, this could result in a larger number of learners who are NEET at Post 16.
- Schools must be able to evidence they have completed the school level elements of the SEND code or there is additional social care or health evidence of obvious need for those small number of children where this might be the case.
- Ensure it is consistently applied and its impact on outcomes for the child is frequently reassessed.

4.1.3. Question 6: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities that are missing within **theme B**.

11 respondents answered this question. The following points were raised in their responses:

- Making sure that EHCP provision is properly funded from council with the EHCP plans coming with allocated funds.
- Too much of a disconnect between Education, Health and Care.
- Simplify and speed up EHCP processes TAC meetings.
- After school sessions are not funded either as only 25 hours are funding.
- A consideration to the writing of provision within EHCP could be reviewed.
- Funding pot for schools to access high-quality training for staff to improve Quality First Teaching over time.
- No child should have funding removed and all should have opportunity to reapply for funding if process is changed.
- Schools audited for amount of SEN and how much is being spent and their budgets set accordingly.
- Funding for 1 year is not an efficient use of time because there is generally a delay in getting the money and applications can take a long time do each time. Three years would be better and would also help with stable recruitment of staff.
- SENCOs in schools should consider applying for EHCPs for those learners in Y10 who would need to access Element 3 funding enabling them to succeed at Post-16.
- There needs to be more focus on the transition to year 7 to maintain children in the mainstream and then into KS4.
- Having LSAs for every class would reduce amount of top up applications.
- Evidence should be collected across the city to determine the % of short term non stat TU that have an impact, meaning that a pupil can continue in mainstream without an EHCP and does not get excluded or moved from school to school - where this practice is strong and successful schools could work together to replicate practice.
- EHCP model is fragile - high need blocks are always overspent and the consistent delivery of OAP is a real challenge for schools.

4.1.4. Theme B: Response from Bristol Parent Carers et al.

We welcome the approach that Top up will be more closely monitored and support the notion that there should be a series of checks and balances in place for those utilising Top-Up. But how will BCC review the effectiveness of the notional SEND

budget spending in schools, please could we have more information on the specifics of how this will takeplace? Please see the comments below for further details:

- We are concerned that BCC's ideology of lowering the number of EHCPs issued and the notion of 'time limited' support plan funding is not compatible. What will happen if top up via support plan 'runs out' but an EHCP has not been issued? (View supported by Bristol Parent Carers, Nothing Special & Bristol Autism Support)
- The proposal affects all learners irrespective of ethnicity. However, we do know that black boys are more likely to be disproportionately affected by exclusion or educational issues. So this group could potentially be more adversely affected if there is any gap between time-limited, non-statutory funding and statutory funding due to the length in EHCP wait times. (View supported by Bristol Parent Carers)
- There needs to be consistency across schools in SEND support delivered that is evidenced-based and documented in a uniform way so that if EHCP is needed it can be carried out without delay/withdrawal of top-up. How will this be possible? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch) & Bristol Autism Support)
- Key stage transfer pupils need careful consideration. Bristol City Council EHCP rate for new EHCPs for year 7 pupils is the highest in England. Does top-up mask the need for a specialist setting or statutory provision to ensure inclusion is delivered in their current setting? How will this impact placement planning in theme 1? And how will this review ensure pupils who need an EHCP get one and do not remain on support plans for long periods of time? (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)
- Reviewing the use of top-up money and seeking to utilise Element 1 or 2 funding simply shifts the budget responsibility to a different pot. It is not clear to us how this would make any net savings. The Terms of Reference for this programme should be scrutinised to ensure it focuses on net benefit. (View supported by Bristol Parent Carers, Nothing Special, National Autistic Society (Bristol branch), Bristol Autism Support)

4.2. Theme E: Specialist Place Funding

Theme E is about reviewing the methodology of funding for special schools to ensure best value is delivered and Bristol has a transparent and equitable approach across specialist settings.

We have the following proposal for theme E:

E1: The aim is to review the statutory funding system to ensure it is in line with other local authorities and implement a standardised banding and process which ensures statutory funding aligns with need. A clear and consistent approach will ensure the most efficient and effective use of funding.

4.2.1. Question 7: In respect of Theme E: Specialist Place Funding, do you think we have identified the right theme to focus on?

Respondents were asked whether **theme E** was the right theme to focus on.

- 76% of respondents agree or strongly agree
- No respondents disagree

In respect of Theme E: Specialist Place Funding, do you think we have identified the right theme to focus on?			
Answer Choices		Response Percent	Response Total
1	Strongly agree	27.59%	8
2	Agree	48.28%	14
3	Neither agree nor disagree	24.14%	7
4	Disagree	0.00%	0
5	Strongly disagree	0.00%	0

2 respondents answered the question “If you selected Disagree or Strongly Disagree, can you explain why?”. The following points were raised in their responses:

- Hard to compare state run and independent providers.
- Specialist schools need increased budget.
- Specialist provision is required for children who’s needs fall between the higher needs and mainstream provision.

4.2.2. Question 8: Do you agree or disagree with proposal E1?

Respondents were asked whether they agree or disagree with **proposal E1**.

30 respondents answered this question.

- 83% agree or strongly agree
- 3% disagree or strongly disagree

Do you agree or disagree with proposal E1?			
Answer Choices		Response Percent	Response Total
1	Strongly agree	23.33%	7
2	Agree	60.00%	18
3	Neither agree nor disagree	13.33%	4
4	Disagree	3.33%	1
5	Strongly disagree	0.00%	0

11 respondents commented on the **proposal E1**. The following points were raised in their responses:

- New system needs to work on an individual basis and not be too prescriptive.
- Consistent approach across all schools needed.
- Whole EHCP process needs looking at.
- Solution that is unique to Bristol is needed.
- Current funding is not always being used efficiently.
- Funding should be linked to a child's ECHP.
- Consider what schools are spending on staff.
- Supportive of proposal.
- A redistribution of funding from those with higher current agreements to those with lower agreements would be fair.

4.2.3. Question 9: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities that are missing within **theme E**.

5 respondents answered this question. The following points were raised in their responses:

- SEN manager should work closely with schools to better understand cost of places.
- Local Authorities need to look closely at where money for high-cost placements is going and ensure value for money, especially with independent specialist provision.
- Specialist place funding needs to be looked at in tandem with special place availability.
- Staff need training on writing and costing plans to ensure high quality and correct provision.
- Reduce staff turnover
- Regular contact between schools and case workers needed
- More funding needed from Health in the provision of services for children and young people particularly around mental health (up to and including at the Children and Adolescent Mental Health Services threshold)

4.2.4. Theme E: Response from Bristol Parent Carers et al.

We have concerns with this proposal and the use of banding for implementation of top-upfunding, presumably to support EHCP learners (as this is for specialist settings).

We know that BCC is developing a matrix for non-statutory support which will ensure top-up funding for support plans is tailored to meet the needs of every learner, we would urge BCC to adopt a similar approach for statutory plans.

Currently, over 50% of top-up applications do not deliver the requested level of support that schools have asked for (for SP and EHCPs). We know that there can be a variation in school expectations but we would urge BCC to consider the knock-on impact banding funding will have on schools' ability to be inclusive especially given the aims of Theme A and C. In addition to the time constraints of school staff sitting on related funding request panels.

We agree that a clear and consistent approach will ensure the most efficient and effective use of funding but we do not believe banded funding is appropriate for the delivery of Section F provision of EHCPs (which we assume most CYP will have in specialist settings). Please see the comments below for further details:

- The 2015 SEND Code of Practice, paragraph 9.69 clearly says that “provision must be detailed and specific, and should normally be quantified.” There can be no reference to banding in an EHCP. (View supported by Bristol Parent Carers, Nothing Special, & National Autistic Society (Bristol branch), Bristol Autism Support).
- Banding must account for fluctuation in the economy, inflation, teaching staff pay rises etc (View supported by Bristol Parent Carers, Nothing Special, & National Autistic Society (Bristol branch), Bristol Autism Support).

- The objective of this programme as stated is admirable but more work is required to ensure that efficient and effective funding is the outcome of standardisation. What measures will be applied? For example, will consistency with other Authorities be more or less important than aligning funding with needs and how will the benefits be measured? (View supported by National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)

4.3. Theme F: Post-16 Funding

Theme F is about reviewing the post-16 offer to ensure full alignment to Department for Education and Education and Skills Funding Agency guidance.

We have the following proposals for theme F:

F1: Review of 18 to 25 Education, Health and Care Plan Top Up Funding

To review funding to ensure it is in line with statutory requirements.

F2: Review Post-16 Out of Authority

To review out of authority post-16 provision to inform and develop more cost-effective local options.

4.3.1. Question 10: In respect of Theme F: Post-16 Funding, do you think we have identified the right theme to focus on?

Respondents were asked whether **Theme F** was the right theme to focus on.

29 respondents answered this question.

- 66% agree or strongly agree
- No respondents disagree

In respect of Theme F: Post-16 Funding, do you think we have identified the right theme to focus on?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		20.69%	6
2	Agree		44.83%	13
3	Neither agree nor disagree		34.48%	10

In respect of Theme F: Post-16 Funding, do you think we have identified the right theme to focus on?

4	Disagree		0.00%	0
5	Strongly disagree		0.00%	0

1 respondent responded to the question “If you selected Disagree or Strongly Disagree, can you explain why?”. The following points were raised in their responses:

- Pleased to hear about the Rainbow project as there are currently limited options for young people in Bristol.

4.3.2. Question 11: Do you agree or disagree with the theme F proposals?

Respondents were asked whether they agreed or disagreed with the theme F proposals:

F1: Review of 18 to 25 Education, Health and Care Plan Top Up Funding

To review funding to ensure it is in line with statutory requirements.

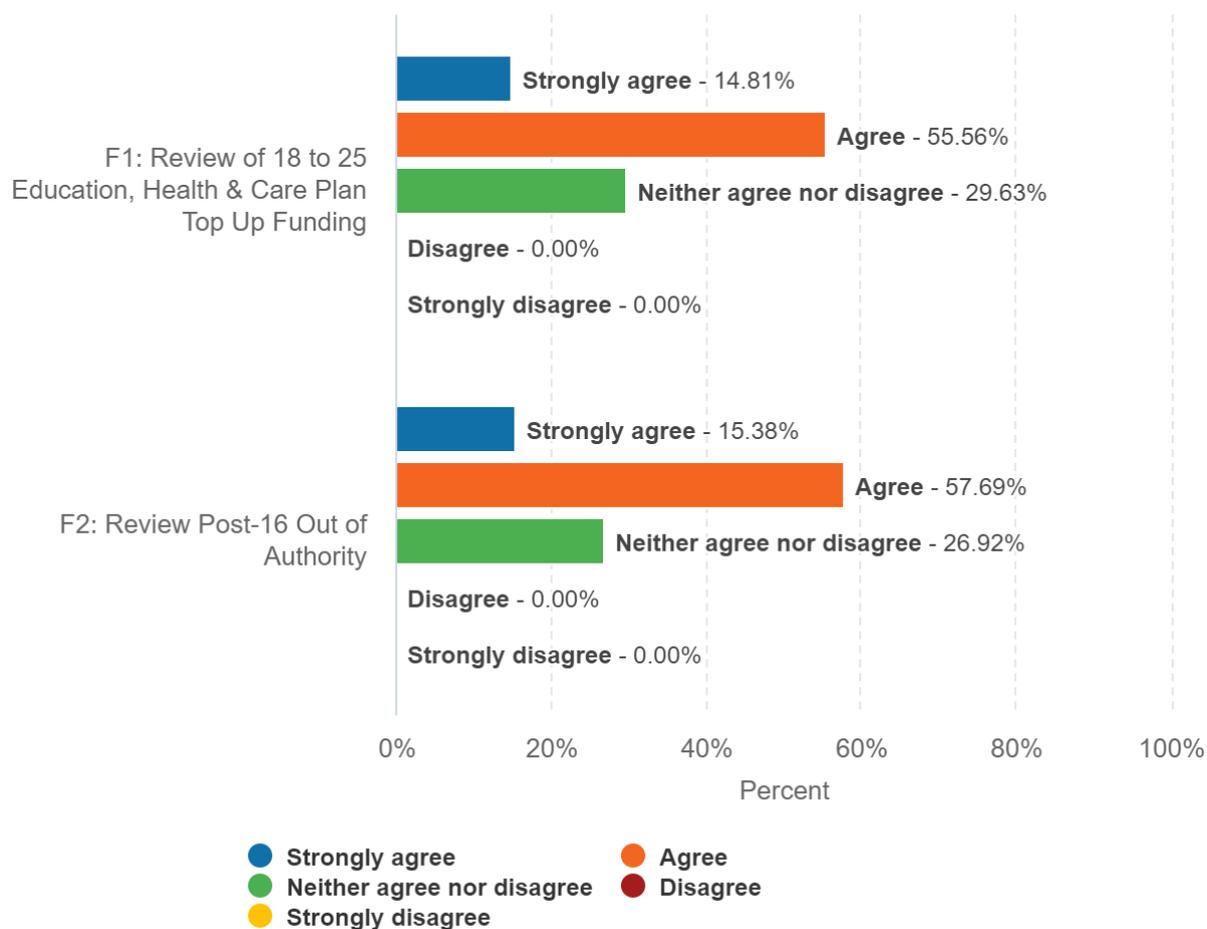
- 70% agreed or strongly agreed
- No respondents disagreed

F2: Review Post-16 Out of Authority

To review out of authority post-16 provision to inform and develop more cost-effective local options.

- 73% agree or strongly agree
- No respondents disagree

Do you agree or disagree with the theme F proposals?



5 respondents commented on the theme F proposals. The following points were raised in their responses:

- Whole EHCP process needs looking at.
- Important to ensure that children 18-25 have provision that meets their needs.
- Consistent approach for 0-24 year olds needed.
- Not enough knowledge to comment.
- Post-16 offer needs better provision for those with EHCPs and lower levels of SEND.

4.3.3. Question 12: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities that are missing within **theme F**.

3 respondents answered this question. The following points were raised in their responses:

- SEN places for this age group are limited.
- EHCP should be funded when they are written.
- Recently closed primary school sites should be used to support SEND provision.
- Is SEND provision being designed into the two new secondary schools?
- Unhappy with allocation of school places which results in long travel distances.
- Equitable access practice from some schools remains unchallenged e.g. some academies and faith schools.

4.3.4. Theme F: Response from Bristol Parent Carers et al.

We do not feel informed enough to form a view on this area of the consultation response.

It is not clear to us what the term 'greater clarity' refers to and we would urge BCC to consult with other organisations, families and young people directly on these issues. Please see the comments below for further details:

- The description here rather implies that current post-16 arrangements do not operate in line with statutory requirements. Whilst the post-16 transition is a common problem it might be appropriate to remove this implication of current failure. (View supported by National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)
- We think Bristol is in need of more varied post-16 support and we would welcome this as it is likely to save costs where young people are being sent to provision out of area for post-16 support (Bristol Autism Support, Nothing Special, National Autistic Society (Bristol branch), Bristol Parent Carers)

4.4. Theme G: Alternative Learning Provision (ALP)

Theme G is about reviewing and reforming the Alternative Learning Provision model and funding to improve outcomes and ensuring best value provision.

We have the following proposal for theme G:

G2: The previous ALP review identified key recommendations, which continue to be addressed. The next stage of the process is to review ALP based on the proposals in the recent government Green Paper, reviewing the impact of the current model and the benefits of moving to a new model with a greater focus on outreach and early intervention that builds inclusive capacity in schools.

A model that ensures more children and young people remain engaged in education within their own school or setting, limits the number of move between settings and builds capacity in schools to meet need has very clear benefits for children and

young people and families. The associated use of funding will also be more cost effective as it will both support children and young people within their own settings but also build long term capacity in the system.

4.4.1. Question 13: In respect of Theme G: Alternative Learning Provision (ALP), do you think we have identified the right theme to focus on?

Respondents were asked whether **theme G** was the right theme to focus on.

- 97% of respondents agree or strongly agree
- No respondents disagree

13. In respect of Theme G: Alternative Learning Provision (ALP), do you think we have identified the right theme to focus on?			
Answer Choices		Response Percent	Response Total
1	Strongly agree	20.00%	6
2	Agree	76.67%	23
3	Neither agree nor disagree	3.33%	1
4	Disagree	0.00%	0
5	Strongly disagree	0.00%	0

4.4.2. Question 14: Do you agree or disagree with proposal G2?

Respondents were asked whether they agreed with the following proposal:

G2: The previous ALP review identified key recommendations, which continue to be addressed. The next stage of the process is to review ALP based on the proposals in the recent government Green Paper, reviewing the impact of the current model and the benefits of moving to a new model with a greater focus on outreach and early intervention that builds inclusive capacity in schools.

A model that ensures more children and young people remain engaged in education within their own school or setting, limits the number of move between settings and builds capacity in schools to meet need has very clear benefits for children and young people and families. The associated use of funding will also be more cost effective as it will both support children and young people within their own settings but also build long term capacity in the system.

- 90% of respondents agree or strongly agree
- 3% of respondents disagree or strongly disagree

Do you agree or disagree with proposal G2?			
Answer Choices		Response Percent	Response Total
1	Strongly agree	30.00%	9
2	Agree	60.00%	18
3	Neither agree nor disagree	6.67%	2
4	Disagree	0.00%	0
5	Strongly disagree	3.33%	1

4.4.3. Question 15: Are there any potential opportunities that are missing within this theme that would secure better outcomes but also be sustainable?

Respondents were asked whether there were any potential opportunities that are missing within **theme G**.

4 respondents answered this question. The following points were raised in their responses:

- Funding is needed to enable schools to adapt buildings to meet needs of pupils with complex social, emotional, and mental health needs
- Restrictions should be placed on profit that can be generated by companies offering ALP
- ALPs should provide training to school staff in the cluster annually to ensure equity of approach across schools and Bristol
- ALP use should be registered with Ofsted

4.4.4. Theme G: Response from Bristol Parent Carers et al.

The ALP Review BCC carried out has already identified significant improvements that should be made to this service alongside any possible changes that come about should the green paper be implemented.

We agree that a model that ensures more children and young people remain engaged in education within their own school or setting and which limits the number of moves between settings will be beneficial to CYP in Bristol. But we remain unclear precisely how these aims will be achieved and what vision BCC has on this issue. Please see the comments below for further details.

- Great but important to understand the impact of this ALP work on the budget overspend and the implementation timescale. This sounds like something which would take several years to pay back the cost of change albeit with a great outcome in the future. It must be protected against short-term budgetary challenges. (View supported by National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)
- Appropriate ALP provision and improvement is vital to supporting those who are out of school. ALP often requires an individualised approach, caution needs to be taken where various vulnerable children with very different needs are put together. (Bristol Autism Support, Bristol Parent Carers)

Other themes

4.4.5. Question 16: Are there any potential themes you think are missing? What are they?

11 respondents answered this question.

The following points were raised in their responses:

- Better links between Health and Education are needed.
- Better partnership working and communication between SEND team and schools.
- Consistency between schools is needed.
- More funding from Department for Education needed as current model puts Local Authority and schools under pressure.
- More specialist places for high need pupils required
- Better access to Continuing Professional Development training will improve Quality First Teaching across the city.
- Safeguarding
- Bristol should have a whole Local Authority approach to SENCo ring-fenced time.
- Post-16 providers should be used to deliver Early College Provision in the college vocational setting or on school premises.
- Ensure local elements of the formula continue to invest in vulnerable and disadvantaged groups.

4.4.6. Other comments from Bristol Parent Carers et al.

Bristol Parent Carers et al. had the following additional comments:

- How will the overall programme be controlled and what coordination is planned between the different programmes of work? (View supported by: National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)
- Do the detailed programmes cover all the proposed mitigations from the DFE DSG mitigation plan? What else was raised? (View supported by: National Autistic Society (Bristol branch), Nothing Special, Bristol Parent Carers & Bristol Autism Support)
- How is the overspend and overall budget impacted by changes to the National Funding formula from 2023? Is the current approach used by Bristol likely to mean there is a significant change as we transition to the new rules? If so, how will notional SEN budgets be impacted? (View supported by: National Autistic Society (Bristol branch), Nothing Special, Bristol Autism Support & Bristol Parent Carers)
- Current delays to the EHCP process mean that there is a significant number of pupils requiring support but not receiving it. It is not currently clear whether the HNB budget is based on actual numbers or a theoretical percentage. If based on actual numbers, should we not introduce a programme to reduce the EHCP waiting list, thereby increasing both overall funding and the demand for Non-Statutory Top up / Early intervention? (View supported by: National Autistic Society (Bristol branch), Nothing Special, Bristol Autism Support)