Project Owner: Julie Kelly / Abi Preston
Project Consultant: Helen Redding

1. Introduction

1.1 This report forms the first phase of the review of banding (top up) levels for Education Health and Care Plans and funding allocated linked to SEND Support.

1.2 It forms part of the work with partners to deliver Hillingdon's refreshed SEND Strategy in the context of rising demand and overall budget pressures and deliver the actions agreed with the DfE in relation to the DSG Safety Valve Conditions.

1.3 Phase 1 has focused on mapping current activity, benchmarking across other LAs where information is available, analysing data and information, reviewing other models, and proposing recommendations to take forward into Phase 2. It has included constructive feedback and advice on work being undertaken.

1.4 It has informed the actions needed to carry out Phase 2 which should include involvement from a broader group of people representing the Council, schools, and other partners.

2. Main aims of the project

2.1 To ensure that there is a fair, transparent, and effective funding system that supports:
- the right provision / support being in place at the right time as locally as possible linked to evidenced needs.
- identifying and sharing best practice and enabling it to become common practice.
- improved parent / carer confidence in Hillingdon's local provision.
- efficient and effective use of funding / resources.

2.2 The work will:
- provide information from other areas to help benchmark Hillingdon's allocation of high needs and other funding against other local areas, including contributions of other partners.
- identify recommended actions to review current banding system across settings, schools and FE providers and inform future planning and delivery of priorities linked to Hillingdon's Strategy for SEND.
- ensure recommendations lead to sustainable management of resources into the future.

3. Intended outcomes.

3.1 Supporting and informing:
- a shared understanding of the range and levels of needs across Hillingdon schools and how that compares with other areas.
- a transparent and equitable system of resource allocation across Hillingdon with clear co-produced matrices of need, provision and then matching this to funding.
- identification of potential changes to the current system.
- improvement in the quality and clarity of EHCPs.
- evidencing the impact of resourcing on children and young people's outcomes.

4. Review of existing data, its use, and identifying gaps.

4.1   The current data systems have not been working effectively. Work has already been initiated to address the issues, including a review of the system itself and what needs to be done to enable it to operate effectively. These system issues are likely to have impacted on efficient and effective resourcing in the past, so these actions are required.

4.2   As a consequence of the system issues, SEND related data currently exists in several places and formats and is not always consistent. This issue has been exemplified through this desktop review. Steps have been taken to identify the data accuracy issues and rectify them.

4.3   It is vital that all partners are confident in the accuracy of the data as this is needed to inform actions, support efficient resourcing, and measure performance.

4.4   I have used and compared the publicly available data and the internal data provided. There are some discrepancies between the two, and some of the data requested identified inaccuracies in some of the coding in the information which created challenges in the analysis. The published SEN2 data will have been drawn from the local system and will have been impacted by the issues in the system in previous years.

4.5   The actions already being taking urgently to address this will support the Phase 2 work.

4.6   The data available is not routinely shared with partners, including schools, which has impacted on the shared understanding of the challenges and work needed to support the next steps.

4.7   There is not currently a dashboard that brings together SEND data from different agencies to inform collective views and actions that will efficiently and effectively support improving outcomes for children and young people with SEND. A multi-agency SEND dashboard is required that includes numeric data, feedback (including Parent Carer Forum Annual Report and themes from their work), themes from complaints and compliments and themes from SENDIAS casework.

4.8   The steps being taken to improve the system and develop data reports will support Phase 2 of this piece of work, strengthen the JSNA and inform collective endeavours to improve outcomes and make best use of all the resource available. This will also support identifying what we need to stop doing or do less of in order to focus on what needs to be done or what we need to do more of.

5. Review and analysis of numbers and percentages on Children and Young People, both with and without an EHCP to inform hypothesis on emerging trends and recommendations for next steps.

5.1   This section has been put together using data from LG Inform and The Local Authority Interactive Tool (LAIT). These summarise published data across different Local Authorities and draw from the SEN2 Return and the school census.

5.2   The school census provides data on children and young people n Hillingdon schools who may or may not live in Hillingdon.

5.3   The SEN2 data provides information on children and young people with an EHCP maintained by Hillingdon, who may be accessing education both in and outside of Hillingdon maintained schools and academies.

5.4   Both sets of data are important to consider as they reflect different information.

5.5   Analysis of comparative data supports a local area in establishing the similarities and differences between themselves and other local areas, supporting and informing collective conversations about the reasons for this and where work needs to be focussed.

5.6   Hillingdon's statistical neighbours are:
- Slough
- Ealing
- Hounslow
- Sutton
- Redbridge
- Reading
- Coventry
- Merton
- Milton Keynes

- Barnet

5.7 **Profile of children and young people with SEND across all Hillingdon schools (school census data)**

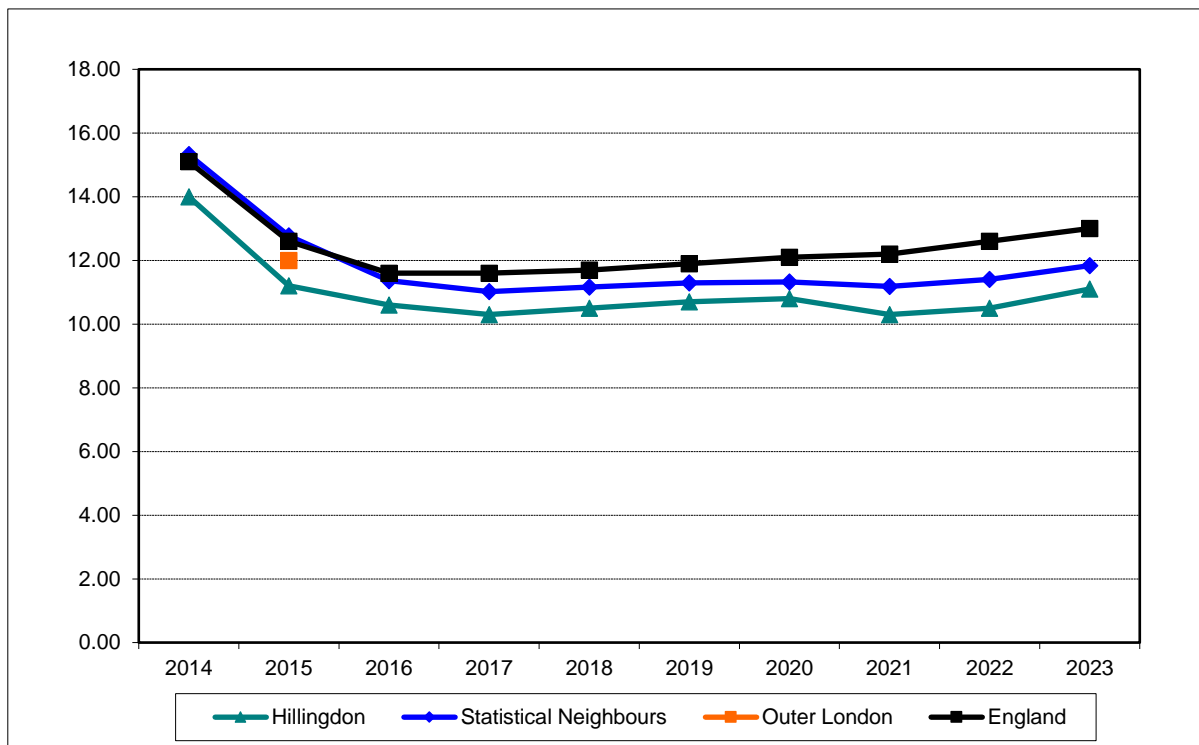**Figure 1. Percentage of pupils across all Hillingdon schools identified as receiving support at 'SEND Support'.**

Figure 2. Percentage difference between Hillingdon and Comparators

Year	Hillingdon	Statistical Neighbour gap	England gap
2020	10.80%	+0.52%	+1.3%
2021	10.30%	+0.88%	+1.9%
2022	10.50%	+0.90%	+2.1%
2023	11.10%	+0.74%	+1.9%

5.7.1 The identification of children and young people at SEND Support across Hillingdon has remained lower than comparators since 2014. The gap between Hillingdon and comparators widened between 2020 and 2022 and narrowed slightly in 2023.

5.7.2 It is important to understand how this is broken down by age phase to help identify where there may be more specific issues / challenges and strengths. This will support conversations with schools on possible hypotheses and identification of next steps. This is set out below.

5.8 Profile of children and young people receiving SEND Support across Hillingdon schools in Primary Phase (school census data)

Figure 3. Percentage of pupils across Hillingdon Infant, Junior and Primary schools identified as receiving support at 'SEND Support'.
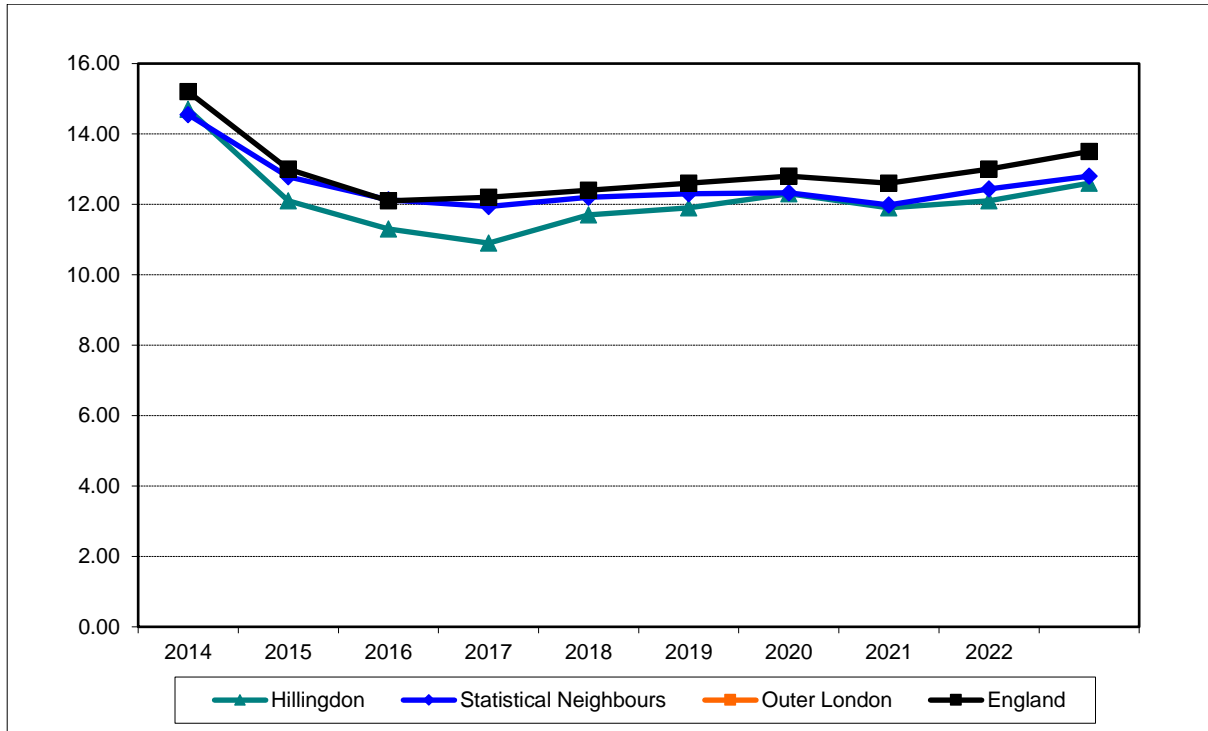

Figure 4. Percentage difference between Hillingdon and Comparators

Year	Hillingdon	Statistical Neighbour gap	England gap
2020	12.30%	+0.03%	+0.50%
2021	11.90%	+0.08%	+0.70%
2022	12.10%	+0.34%	+0.90%
2023	12.60%	+0.20%	+0.90%

5.8.1 Identification of children and young people at SEND Support across Hillingdon primary phase schools was lower than statistical neighbours between 2015 and 2019 and has been broadly in line since 2020. The gap between Hillingdon and the England average has been consistently just under 1% since 2021.

5.8.2 There are, however, differences between types of schools, with 1.6% more children being identified at SEND Support in infant and junior schools than primary schools. It is important to understand the possible reasons for this difference.

5.8.3 As at the Spring 2023 census at Hillingdon infant, junior, and primary schools:
- 14.3% of children were identified at SEND Support in infant schools.
- 14.3% of children were identified at SEND Support in junior schools.
- 12.7% of children were identified at SEND Support in primary schools.

5.8.4 Percentages also vary significantly between schools.
- Infant schools: percentages vary between 10.5% and 19.6%, with 0/10 schools below 10% and 3/10 schools above 15%
- Junior schools: percentages vary between 8.9% and 24.5%, with 1/10 schools below 10% and 5/10 schools above 15%

- Primary schools: percentages vary between 2.8% and 37.1%, with 17/48 schools below 10% and 10/48 schools above 15%.
- 2 of the primary schools with above 15% of children at SEND Support are schools with a specialist resourced provision (SRP).

5.9 Profile of children and young people across Hillingdon schools in Secondary Phase identified as receiving support at 'SEND Support' (school census data and includes UTC and Skills Hub)

Figure 5: Percentage of pupils across Hillingdon Secondary phase schools identified as receiving support at 'SEND Support'.
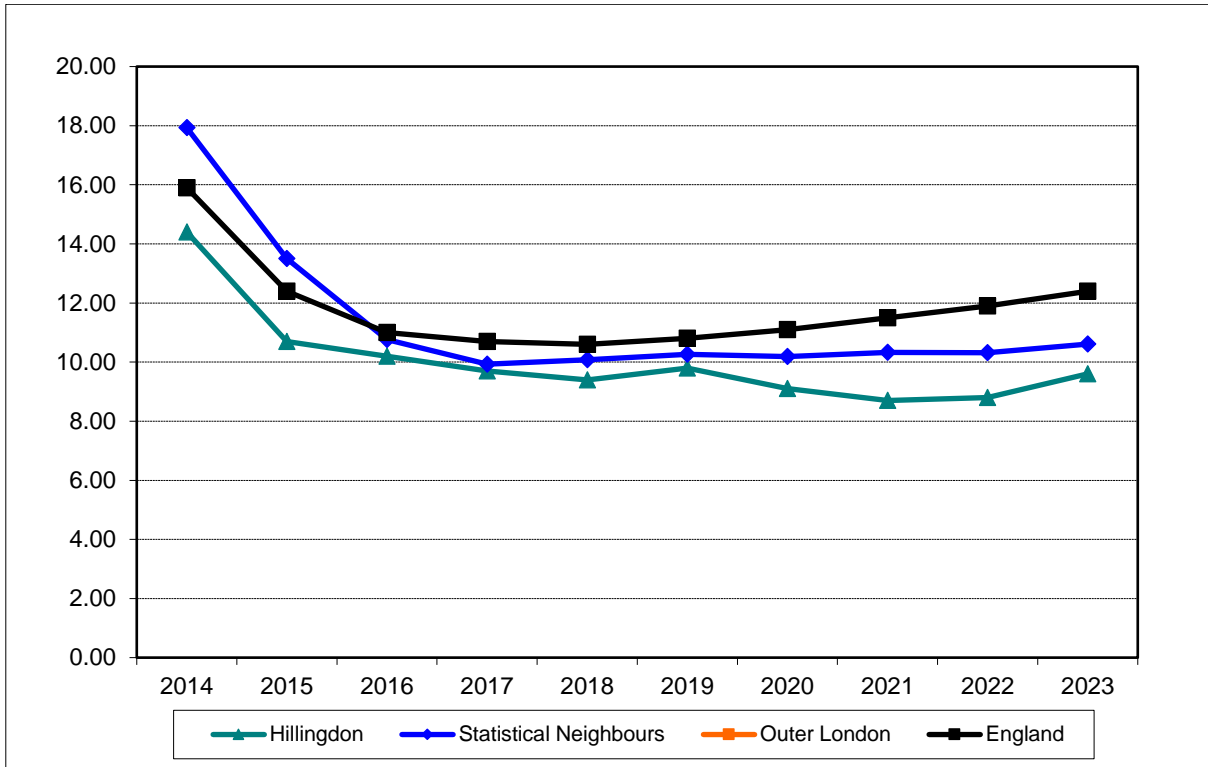

Figure 6. Percentage difference between Hillingdon and Comparators

Year	Hillingdon	Statistical Neighbour Gap	England Gap
2020	9.10%	+1.09%	+2.0%
2021	8.70%	+1.63%	+2.8%
2022	8.80%	+1.52%	+3.1%
2023	9.60%	+1.01%	+2.8%

5.9.1 Identification of children and young people at SEND Support across Hillingdon secondary phase schools has been consistently lower than comparators since 2014. Although the gap narrowed in 2019 to 0.46% for Statistical Neighbours and 1% for the England average in 2019, it widened between 2020 and 2022. The gap narrowed in 2023 against both comparators, with a steeper increase in SEND Support than that experienced elsewhere.

5.9.2 As at the Spring 2023 census at Hillingdon secondary schools:
- 9.5% of young people were identified at SEND Support in Secondary schools.
- 12.8% of young people were identified at SEND Support in UTC / Studio school.

- 26.3% of young people were identified at SEND Support in The Skills Hub (PRU). It is usually expected that a much higher percentage of children and young people requiring this type of provision have been identified at SEND Support. This needs further interrogation with schools.

5.9.3 Percentages vary significantly between schools.
- Across secondary schools, percentages vary between 4.8% and 23.8%,
- 10/18 schools identified below 10% of students at SEND Support.
- 6/18 schools identified below 8% of students at SEND Support.
- and 1/18 schools identified above 15% of students at SEND Support.

5.9.4 This variation needs further investigation in terms of:
- are the outliers where you would expect in terms of social demographics?
- what other factors are impacting on these variations?

5.9.5 The data suggests that there is significant variation in practice across schools in terms of how and when schools identify children and young people at SEND Support. This needs further exploration with schools, including how they use the Ordinarily Available guidance, and identification of what else would support them in identifying and meeting needs early.

5.9.6 It is important to drill deeper into this data to understand what is impacting on the variation, what can we learn from this, and what actions are needed to support addressing any issues identified. This needs discussion with school sectors.

5.9.7 Review and update of Ordinarily Available / SEND Support Guidance using examples of effective local and national practice linked to Hillingdon processes would support more consistent identification of needs and provision in place to meet needs as early as possible. This should form part of a graduated approach to identifying and meeting needs across Hillingdon.

5.9.8 This work has started and when finalised and linked to the process for requesting additional support should enable more consistent identification and meeting of needs; help make the best practice across Hillingdon common practice; and increase parent / carer confidence in local SEND Support provision.

5.10 EHCPs in Hillingdon Schools (all schools)
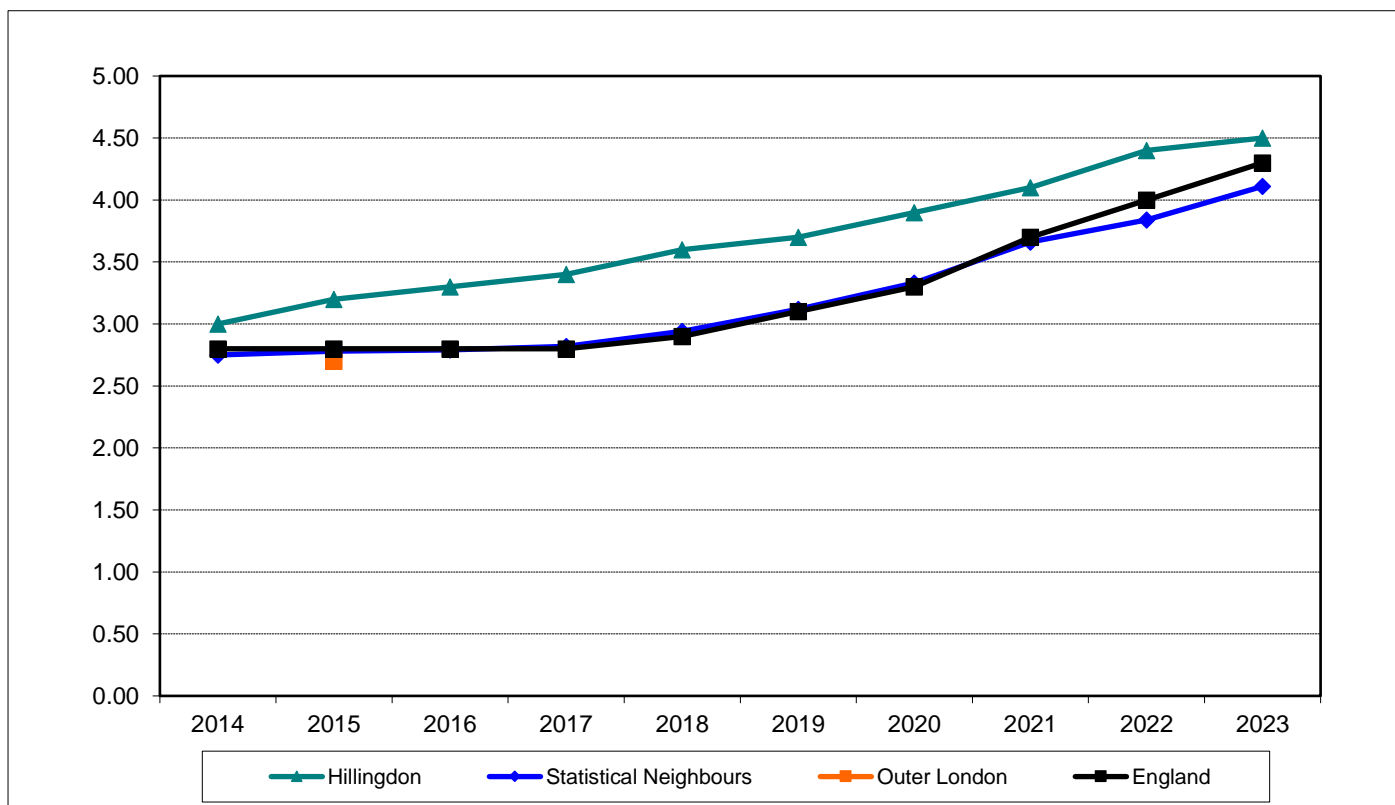### Figure 7 Percentage of EHCPs across Hillingdon

Figure 8 Percentage difference between Hillingdon and Comparators

Year	Hillingdon	Statistical Neighbour Gap	England Gap
2020	3.90%	- 0.6%	- 0.6%
2021	4.10%	- 0.44%	- 0.4%
2022	4.40%	- 0.56%	- 0.4%
2023	4.50%	- 0.39%	- 0.2%

5.10.1 Hillingdon has consistently had a greater proportion of children and young people with an EHCP (previously statement) than comparators, although the gap is narrowing.

5.10.2 As at SEND Support, it is important to understand how this is broken down by age phase and by placement type (see section 6) to help identify where there may be more specific issues / challenges and strengths. This will support conversations with schools on possible hypotheses and identification of next steps.

Figure 9 Percentage of primary pupils with an EHCP

% of pupils who have statement/EHCP of SEN (primary)

Figure 10 Percentage difference between Hillingdon and Comparators

Year	Hillingdon	Statistical Neighbour Gap	England Gap
2020	2%	+0.09%%	-0.29%
2021	2.3%	+0.14%	-0.2%
2022	2.5%	+0.11%	-0.2%
2023	2.6%	+0.22%	-0.1%

5.10.3 Hillingdon has a lower proportion of EHCPs for primary pupils than statistical neighbours, but a higher proportion than the national average. All three comparators follow a similar trajectory.

5.10.4 As at the Spring 2023 census at Hillingdon infant, junior, and primary schools
- 3.1% of children had an EHCP in infant schools.
- 3.2% of children had an EHCP in junior schools.
- 2.7% of children had an EHCP in primary schools.

5.10.5 The figures above include children in specialist resourced provisions (SRPs).

5.10.6 Percentages also vary significantly between schools. Numbers of children taking up a place at a specialist resourced provision (SRP) at a school have been taken out of the figures below to compare across schools.
- Infant schools: percentages vary between 0.8% and 6.3%, with 6/10 schools above 2.6% (Hillingdon average at Spring 2023), of which 2 are over 3%and 1/10 schools below 1%. One of the schools with over 3% also has an SRP.
- Junior schools: percentages vary between 1.8% and 8%, with 4/10 schools above 2.6%, of which 2 are over 3% and 2/10 schools below 2%. One of the schools with over 3% also has an SRP.
- Primary schools: percentages vary between 0.3% and 6.8%, with 20/48 schools above 2.6%, 19/48 schools below 2%, with 12 of those 19 being below 1.5% of which 4 were below 1%.
- 2 of those above 3% have an SRP.

Figure 11 Percentage of secondary pupils with an EHCP

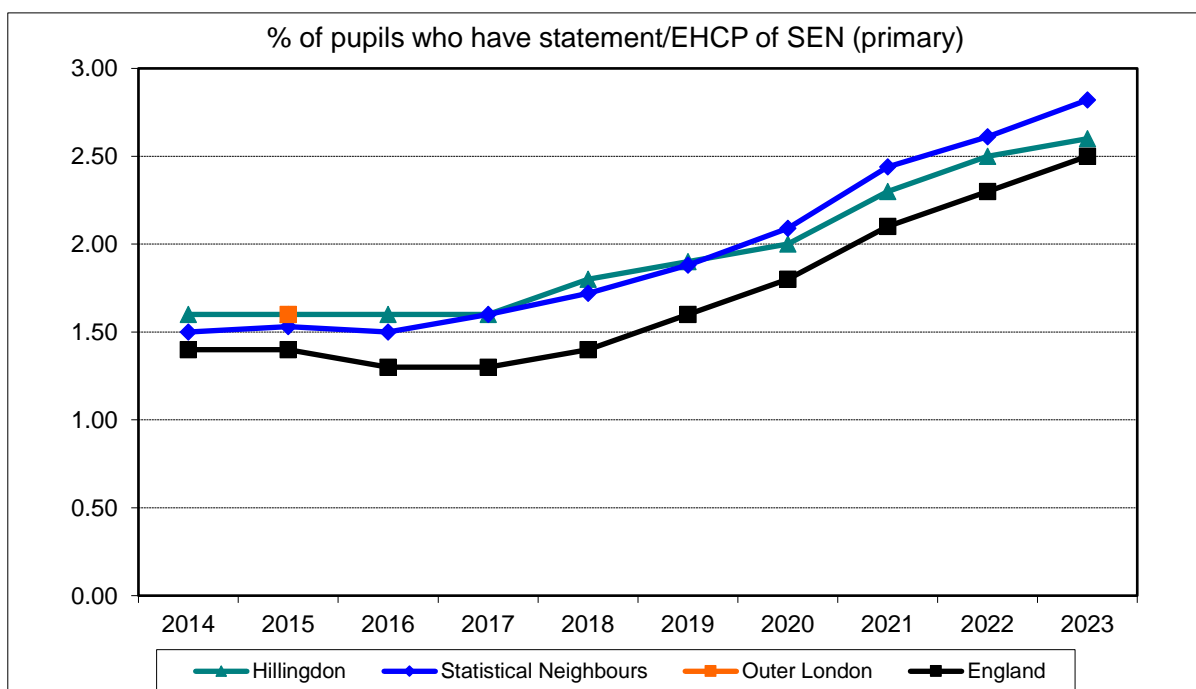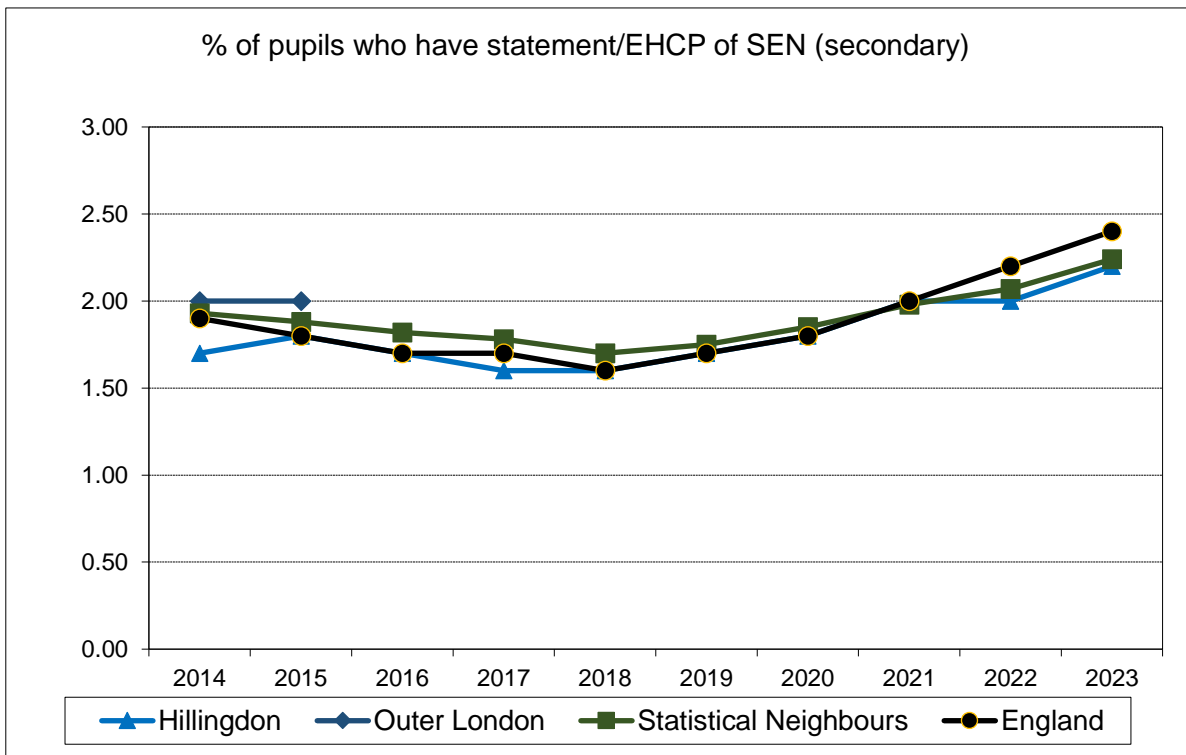**Figure 12 Percentage difference between Hillingdon and Comparators**

Year	Hillingdon	Statistical Neighbour Gap	England Gap
2020	1.8%	+.05%	0%
2021	2%	-0.02%	0%
2022	2%	+0.07%	+0.2%
2023	2.20%	-0.04%	+0.2%

5.10.7 There is a small percentage gap between Hillingdon and comparators.

5.10.8 As at the Spring 2023 census at Hillingdon mainstream secondary schools:
- 2.2% of young people had an EHCP in Secondary schools.
- 2.6% of young people had an EHCP in UTC / Studio school.
- 0% of young people had an EHCP in The Skills Hub (PRU).

5.10.9 Percentages also vary significantly between schools. Numbers of pupils at a specialist resourced provision (SRP) at a school have been taken out of the figures below to compare across schools.
- Secondary schools: percentages vary between 0.6% and 3.6%, with 7/18 schools above 2.2% (Hillingdon average at Spring 2023), of which 4 are over 3% and 4 are below 1%. One of the schools with over 3% also has an SRP.
- Studio school / UTC: One has no EHCPs, and 2 have over 3% of students with an EHCP.

5.10.10   As with consideration of possible hypotheses for the significant differences between schools at SEND support, it is also important to look at this with schools for the profile of placement of children and young people with EHCPs and use this to inform next steps. The aim of this is to ensure that the best practice becomes common practice, and that this supports a fair and transparent allocation of resources to meet children and young people's needs locally.

5.10.11   Taking out the places / pupils accessing SRPs which are funded differently, schools with higher levels of EHCPs have higher costs than other schools as they have to fund the first £6k of each EHCP.

5.10.12   Further consideration should be given to the reasons for this.

5.10.13   Some Authorities have built in a funding mechanism to recognise the financial impact on schools with higher percentages of EHCPs.

5.10.14   It is recommended that as part of Phase 2 this is reviewed, and actions identified to address any issues.

6   Proportion of EHCPs across all types of setting Academic Year 2022/2023

6.1   The figure below is drawn from the DfE published SEN2 data return (Jan 23). This shows the type of setting attended by children and young people who have an EHCP maintained by Hillingdon (Hillingdon residents). The setting may be inside or outside of Hillingdon.

6.2   'Mainstream' includes early years, Alternative Provision / PRU, sixth form and mainstream FE.

6.3   'Independent special' includes non-maintained special schools, independent special schools, and specialist FE.

6.4   'Other' includes Elective Home Education (EHE), Education other than at school (EOTAS), children and young people awaiting a placement, and other arrangements.

6.5   It is important to note that the published figures, based on previous SEN 2 returns will have been impacted by the data system issues. The work being undertaken to ensure data accuracy will support ensuring data is accurate and enable the local area to monitor change over time and plan for future provision.

6.6   The locally held current data of numbers of children and young people placed in special school provision (including Independent and Non-Maintained Special schools) are higher than the published figures.

Figure 13 Proportion of children and young people across mainstream and special settings

% of Residents with EHCPs attending…	Hillingdon	Statistical Neighbours	London	National (England)
Mainstream	48.6%	51.8%	57.7%	51.1%
SRP / DU	3.0%	6.7%	5.3%	3.9%
Special	28.5%	28.0%	23.8%	28.2%
Independent Special	11.3%	6.1%	6.2%	6.6%
Other	8.6%	7.4%	7.1%	10.2%

6.7 Hillingdon has a significantly higher proportion of children and young people with EHCPs accessing special provision, with higher percentages than comparators across the combination of all types of special school provision (maintained and academy special schools, non-maintained special schools, Independent special schools, and specialist FE). Independent and Non-Maintained Special Schools (INMSS) have significantly higher costs than maintained and academy special schools, with some catering for very similar needs.

6.8 The higher levels of placement in the independent and non-maintained sector impacts on the resources available to better meet needs locally.

6.9 Correspondingly there are a lower percentage of children and young people with an EHCP in mainstream schools. This is impacted by the lower percentage of children and young people placed in specialist resourced provisions (SRPs) in mainstream schools than comparators. The current work being undertaken to increase the number of mainstream schools with a specialist provision will help to address this.

6.10 There needs to be further interrogation of whether there may be children and young people attending special schools who could have their needs met in mainstream provision with the right support, including Specialist Resourced Provisions (SRPs).

6.11 It is important to work with schools and with parents / carers to build confidence in local mainstream provision meeting their child's needs.

6.12 Admissions and Transition (exit) Guidance for specialist provision / special schools will help clarify the offer, and videos to support this will help parents / carers, schools, and other partners to see the range of needs provided for by these settings. This is already being picked up through the development of SLAs for SRPs and Designated Units, and the work with special schools. It is important to work with Hillingdon special school leaders to understand the profile of needs of their children and young people and link this with admissions guidance. Visits have been arranged to the special schools to initiate these conversations and listen to their views.

7. Review and analysis of numbers, percentages and profile of children and young people with different needs at SEND Support where additional funding (ESF) was requested across schools / settings).

7.1 The information below has been collated from the ESF spreadsheet provided. Some fields were blank including some of the financial information and decisions. It is important that there is confidence that the data collated is accurate so that it can be reported transparently and help inform analysis and next steps. This should be built into the information management system if possible and reported into the dashboard.

Figure 14 Profile of ESF requests of last 3 years.

Year	Number requested	Phase	Number approved	Number declined	Went on to EHCNA / EHCP
2020/2021	580	Early Years: 297 Primary: 230 Secondary: 49 FE: 4	157 170 37 2	96 58 12 2	152 (51%) 139 (60%) 21 (43%) 2 (50%)
2021/2022	630	Early Years: 283 Primary: 292 Secondary: 49 FE: 2	185 172 27 1	98 120 22 1	111 (39%) 106 (36%) 16 (33%) 0
2022/2023	655	Early Years: 250 Primary: 331 Secondary: 73 FE: 1	159 213 44 1	79 106 25 0	47 80 18 0
Note: 2022/23 EHCNA and EHCPs may still be changing into 2023/2024 academic year					

7.2   It is surprising to see the percentage that are declined. It should be expected that only appropriate requests are submitted. This would suggest that there needs to be greater clarity / guidance for services and schools to ensure that thresholds are met before requests are submitted. This would also reduce unnecessary workload for schools and officers.

7.3   This should be linked with the Ordinarily Available Provision refresh.

7.4   The data was incomplete for identifying how many were initial requests, how many were resubmissions and how many were requests for continuation. This should be rectified to help with monitoring.

7.5   This element needs further exploration with schools and officers as part of Phase 2. This will inform next steps and actions required.

8.   Review and analysis of numbers, percentages and profile of children and young people with different types of needs and funding levels with an EHCP by school type and school.

8.1   Issues with the current funding model have been raised by all partners, including schools. A review of the banding model is a key element of the Council's work linked to the Safety Valve agreement with the DfE.

8.2   The initial phase 1 piece of work has involved a deeper analysis of the spread of funding, consideration of the current model of funding, and analysis of a sample of EHCPs to consider the link between the needs and provision identified in it and the level of funding.

8.3   The table below shows the profile of numbers of pupils against banding levels as of July 2023.

Figure 15 Profile of current banding system (July 23)

BAND	NUMBER	PERCENTAGE	Top Up	LSA hrs
Band 1	31	1%	£ 2,200.00	17
Band 2	66	2%	£ 3,700.00	20
Band **3**	197	6%	£ 6,100.00	25
Band 4	291	9%	£ 8,500.00	30
Band 5	408	12%	£ 10,000.00	
Band **6**	318	9%	£ 15,000.00	
Band 7	217	6%	£ 20,000.00	
Band 8	219	6%	£ 25,000.00	
Band 9	94	3%	£ 30,000.00	
Band 10	633	19%		
Other	945	28%		
Total	**3419**	**100%**		

8.4 Band 10 and 'Other' includes FE College placements and placements in independent and non-maintained special schools.

8.5 The standard hourly rate for TA support has not changed for many years and does not reflect the current costs. It may be that the increase in number of higher-level bands has been impacted by this.

8.6 It would usually be expected that lower bands (the Hillingdon first 4 bands) would reflect mainstream placements, and the higher bands reflect higher level needs and more specialist placements. It is a more mixed picture in Hillingdon.

8.7 According to the data provided, there are children in mainstream schools against all Bands with the largest number across bands 3, 4, 5 and 6.

8.8 In order to understand this better, the detail behind the figures was reviewed.

8.9 There were several coding issues in the data, particularly in the 'other' category. Where it was evident that data was incorrect, this was corrected before putting the table below together. Where there was ongoing work to cleanse the data, 'tbc' has been used.

Figure 16

Band	Number Mainstream	Number Special School
1	32	0
2	70	0
3	210	1
4	290	1
5	270	66
6	154	123
7	35	150
8	10	205
9	6	88
10	32	128
Other	127	tbc

8.10 The pupils coded as special in the lower bands were in out of Borough schools, and so should be coded as such.

8.11 The current top up allocation system does not clearly differentiate between mainstream and specialist provision or special schools.

8.12 There are children and young people in mainstream schools allocated funding across all bands, but the analysis of a sample of EHCPs did not show a correlation between the needs and provision set out in the EHCP and the level of funding (see section 9). This has been impacted by the system currently used to allocate Bands. Its completion seems to vary depending on who completes it and does not reflect what is in the EHCP or type of placement. I recommend moving away from this system and towards a more transparent and equitable system that links to the needs and provision in the EHCP.

8.13 The data on Banding for children and young people in an SRP was not clear, and advice has been given to amend the data reporting system codes to clarify this and enable accurate profiling. This has therefore not been included at this point.

8.14 As part of Phase 2 of this piece of work, the profile data should be considered to determine possible reasons for this from other partners' view. This well help inform further actions.

Figure 17 Profile of current bands mainstream schools Oct 23 (non SRP pupils)

Band	Top up	Number	EY	KS1	KS2	KS3	KS4	KS5
1	2,200	32	0	2	0	8	12	5
2	3,700	70	1	2	19	15	19	13
3	6,100	210	3	11	56	65	50	19
4	8,500	290	6	30	131	68	43	20
5	10,000	270	12	51	151	64	38	9
6	15,000	154	5	48	66	21	8	5
7	20,000	35	0	9	17	5	2	2
8	25,000	10	2	6	2	0	0	0
9	30,000	6	2	4	0	0	0	0
10	varies	32	4	2	4			
Other	varies	127	9	22	34	34	11	10
Total		1236	44	187	480	280	183	83

8.15 23 pupils were identified as Year 14 so may be out of year group or left but not removed from the system.

8.16 There are significantly higher numbers in Key Stage 2.

8.17 The current model of funding in Hillingdon is not fit for purpose and does not reflect the graduated approach to provision.

8.18 Phase 2 of the Banding Review should build on the current funding guidance and develop descriptors of need and provision for the different types of provision across the Borough (mainstream, SRP, and special schools). This would provide greater transparency of resourcing linked to needs.

8.19 This should form part of a graduated approach that clearly sets out the provision that should be expected at each level, starting with what should be 'ordinarily available' in all schools. It is important to learn from the best practice locally as well as nationally and to collectively work to make this practice common practice. This would address the issue often raised by parents / carers, settings and schools and in Local Area inspections on 'local variation' of practice.

8.20 It was also noted that there were a significant number of children and young people out of year group (although 2 are early years, 6 are reception age and 8 are over statutory school age). There is guidance available from the LA on this for schools and families, but its implementation needs to be more closely monitored.

9. Analysis of EHCP audits

9.1 The analysis of a sample of EHCPs illustrated that the funding does not correlate with the needs and provision in the EHCP. Some of the EHCPs only articulated Ordinarily Available Provision which would suggest that needs could be met without the need for an EHCP, or that it could be unfunded.

9.2 EHCPs could be much clearer to support schools in putting in place the provision needed to meet the outcomes sought. The development of guidance will help support this. There should be a clear action plan that set out actions required to ensure advice improves and informs quality EHCPs which have a golden thread running through that show how the outcomes sought, needs and provision link together. This has already been identified as an issue to be addressed.

9.3 Annual Reviews have not routinely been leading to amendments to the EHCPs reviewed when required. This is a frequent key issue in Local Area SEND Inspections.

9.4 This has been identified as an issue for Hillingdon and is being urgently addressed through a project initiated in September 2023. 6 additional Annual Review officers are now in place to process the backlog of Annual Reviews and ensure the process works effectively in the future.

9.5 The Band 1 EHCPs that were reviewed were pupils achieving within or above expected levels for their age. Although both pupils had needs, it could be expected that those needs could be met within ordinarily available / SEND Support provision. 1 had a short block of therapy to support transition with a view to it not being needed after that. The system for identifying funding did not recognise that this was free at point of delivery for this type of school. It was noted as a prepare to cease plan, but the timing meant that this would not happen for another year.

9.6 EHC Plans were reviewed that had £25k top up funding. It was found that what was identified in the EHCP was mostly Ordinarily Available Provision, and other provision identified did not equate to this level of top up.

9.7 An EHC Plan was reviewed where the content of the provision did not equate to the level of funding allocated, but the supporting paperwork suggested that this particular pupil had higher needs than set out in the plan.

9.8 Some of the higher funded EHCPs in mainstream do have high needs, but it would be more positive to articulate these types of needs more clearly in terms of exceptionality in mainstream (medical needs, children and young people who have levels of need that might be appropriate for a specialist placement, but the parent has chosen mainstream, or a specialist placement is not currently available). It is recommended that this is considered as part of the Phase 2 review.

9.9 The ongoing process of quality assurance of EHCPs and the advice informing them should inform multi-agency improvement actions that address the issues in a systematic way.

10. Benchmarking / comparison with other LAs

10.1 In considering the benchmarking figures below, it is important to recognise that not all come with a rationale or detail regarding how the figures were reached and what the expectations are regarding what should be provided from the resources available. They are a starting point for thinking about how Hillingdon compares with other areas where information has been shared, learning from other area approaches, and identifying collective next steps / actions and timescales.

10.2 All statistical neighbour authorities were contacted to ask if they would share their approach and values. Responses were received from Reading, Ealing, Hounslow and Coventry. Reading did not feel it was appropriate to share their current approach and values as they are undertaking a similar review to Hillingdon and so it will be changing. Hounslow and Ealing are currently in the process of reviewing their mainstream top-ups.

10.3 In addition, information was received from Luton, Hampshire and Hertfordshire, as well as top-up values previously collated for five London Boroughs for 22/23 (Southwark, Lambeth, Greenwich, Redbridge (a statistical neighbour) and Slough (a statistical neighbour).

10.4 Some LAs provided figures, but not a supporting framework or the steps they are taking to address local needs. The information provided did not include how many pupils are allocated against each band or how many of the specialist places are filled.

10.5 More comprehensive information was received from Hertfordshire (who completed and implemented their review of High Needs Funding in 2022), Coventry (who have recently completed a review) and Hampshire. It is recommended the detail from these authorities is shared through the recommended new Working Group to support the next steps of the work.

10.6 It is important to remember that of these LAs there are varying cost differences related to Inner London, Outer London, London Fringe, and non-London staffing costs. Different LAs also have different approaches to funding early support without the need for an EHCP, and different thresholds / guidance for agreeing an EHC assessment and for placement in specialist provision.

10.7 There are also different approaches for setting the number of hours expected to be funded through the school delegated budget. In some authorities, the top up values have been the same for many years, and this has led to the hours not matching what is in the EHCP as higher top ups have been requested / agreed to reflect higher costs. The information below needs therefore to be viewed with caution, and best viewed where more information is available and therefore helpful in determining the best way forward across Hillingdon.

10.8 The table below sets out the levels of top up across the Authorities referenced above in mainstream schools.

Figure 18 Levels of top ups in Mainstream schools in other Local Authorities

Local Authority		Band Values	Hours (total E1 and E2)	Supporting documents	Date
Coventry	M1 M2 M3 M4 M5	£2,567 £4,454 £6,969 £8,856 £15,082		Yes	23/24
Ealing		Reviewing			
Greenwich	1 2 3 4	£4,725 £5,770 £7.080 £8,390		No	22/23
Hampshire	Targeted A Targeted B Enhanced A Enhanced B Exceptional	£984 £2,089 £3,165 £5,244 £7,999		Yes	23/24
Hertfordshire	Targeted Targeted Plus Specialist Specialist Plus	£1,855 £4,945 £8,030 £11,115		Yes	23/24
Hounslow		Reviewing			
Lambeth	1 2 3 4 5 Bespoke	£3,450 £6,229 £10,121 £14,012 £18,459 Bespoke		No	22/23
Luton	D3 (Low) D2 (Low) D1 (Low) C3 (Medium) C2 (Medium) C1 (Medium) B3 (High) B2 (High) B1 (High) A (Exceptional)	£1,415 £2,829 £4,244 £5,658 £7,073 £8,487 £9,901 £11,315 £12,730 £14,145	15 hrs 17.5 hrs 20 hrs 22.5 hrs 25 hrs 27.5 hrs 30 hrs 32.5 hrs 35 hrs 37.5 hrs	No	
Redbridge	1 2 3	£3,000 £7,000 £10,000		No	22/23

Slough	1	£2,000		**No**	**22/23**
	2	£3,000			
	3	£5,000			
	4	£7,500			
	5	£8,500			
Southwark	1	£4,150		**No**	**22/23**
	2	£8,250			
	3	£12,350			
	4	£12,715			
	5	£15,125			
	6	£16,450			

10.9   There is some variation across Local Authorities which will be explored further through the working group as part of Phase 2. Most do differentiate between mainstream and specialist provision, which helps illustrate a graduated approach.

11. Funding for SRPs and designated units

11.1   SRPs / designated units are funded on a place plus basis. This means they receive £6k place funding for the commissioned number of places, **plus** the pupil elements received by a school for a particular pupil, **plus** a top up**.** If a place is not filled, they receive £10k (pro-rata for the period it is not filled) to reflect the fact that they are not receiving a pupil element and to ensure stability in their budget.

11.2   Previously SRPS / designated units in Hillingdon have been funded using individual pupil top ups. This does not provide stability in the budget. It would provide more stability if a standard top up was agreed to reflect the level of needs of pupils who require an SRP / unit provision.

11.3   The figure below sets out information on levels of funding in a sample of other LAs who have provided their current figures.

11.4   Some Authorities are yet to provide their figures/ information but have agreed to share them.

Figure 19 Levels of top ups in Mainstream schools with SRPs / designated units in other Local Authorities

Local Authority	Band Levels	Supporting documents	Date
Coventry (support bases)	**ASD £2,687** **SLCN £2,687** **Cognition and Learning £5,142**	**Yes**	**23/24**
Hounslow	**ASD Primary: £10,379 – £11,731** **ASD Secondary £15,456 – £15,718** **SCD Primary £10,504** **MLD Primary £6,816 / £13,088** **PD Primary £16,326** **PD Secondary £19,893** **HI Primary £16,288/£16,340** **HI Secondary £19,787** **SL Primary**	**Yes**	**23/24**

	£6,394 SL Secondary £4,490		
Luton	**PD: £8,367** **HI: £8,367** **VI: £8,367** **ASD: £17,959**	**No**	**23/24**

12. Funding for Special Schools / combined information from other LAs

12.1   Several Authorities are reviewing or have recently reviewed their special school top ups.

12.2   Different Authorities have a different range of provision, and it is important to understand the admissions guidance / levels of need to compare across areas.

12.3   It is also important to take account of different levels of staffing costs in relation to inner, outer and London fringe and other areas.

12.4   Information from other LAs received to date is set out below.

12.4.1 Harlow

Specialist Assessment Nursery: £14,032
Special schools Primary: £19,657
Secondary: £16,314 / £23,032
Post 16: £20,713

12.4.2 Coventry (combined mainstream and special model)

Coventry provided level descriptors to support the information below.

	Cat 1	Cat 2	Cat 3	Cat 4	Cat 5	Cat 6
	Communication and Interaction	*Cognition and Learning*	*SEMH*	*Sensory &/or Physical*	*Exceptional*	*Personalised*
Level A	Universal					Early Support - only as agreed with Head of SS
Level B	Targeted					
Level C	S&L Disorder	Specific LD				
Level D	Social Comm - Moderate	MLD	SEMH - Moderate	HI/VI		
Level E	Social Comm - High	SLD	SEMH - High	PD - High	1:1 Support	CC - only as agreed with Head of SS
Level F	Social Comm - Severe	PMLD	SEMH - Severe	MSI	2:1 Support	

Cat 1	Cat 2	Cat 3	Cat 4	Cat 5	Cat 6
Communication and Interaction	*Cognition and Learning*	*SEMH*	*Sensory &/or Physical*	*Exceptional*	*Personalised*

Level						
Level A	£0.00	£0.00	£0.00	£0.00		As agreed with Head of SS
Level B	£0.00	£0.00	£0.00	£0.00		
Level C	£2,571.19	£3,085.43				
Level D	£3,085.43	£5,142.38	£7,713.58	£7,713.58		
Level E	£10,284.77	£9,513.41	£12,855.96	£12,855.96	£23,506.00	As agreed with Head of SS
Level F	£16,712.75	£15,427.15	£15,427.15	£15,427.15	£47,012.00	

12.4.3 Hounslow

SEMH Primary School	19,657.00
SLD / PMLD Primary School	19,657.00
Specialist Assessment Nursery	14,032.00
All age Autism and Learning needs Primary	19,657.00
All age Autism and Learning needs Secondary	16,314.25
SLD /PMLD Primary School	19,657.00
SLD/ PMLD School - Secondary	23,032.01
SLD / PMLD Sixth Form	20,712.60

12.4.4 Luton

Band 1	£6,934
Band 2	£9,823
Band 3	£13,867

12.4.5 Ealing (expecting to receive with descriptors)

12.4.6 **Hertfordshire** (awaiting information)

13   Summary and next steps

13.1   Senior officers have an accurate understanding of the key issues and what needs to be done and are already taking the appropriate actions to address the issues identified.

13.2   On discussing what has been identified and recommendations for what needs to be considered as next steps, officers have either already started to work on the changes required or have taken immediate action to follow this up.

13.3   The recommendations set out below should be reviewed and agreed.

13.4   The delivery of the Safety Valve Plan and the Banding Review element of it require whole system change across all partners. Engaging with all partners to implement the actions are important to the success of this work.

13.5   A draft delivery plan has been put together for consideration and as a starting point for activity.

13.6   It is proposed that a working group is set up (Nov 23) to lead on the actions and identify further actions, including representatives from the High Needs Funding Group, with agreed dates for delivery.

13.7   The initial stage of work related to mainstream school top ups should be completed to inform roll out of a revised system for EHCP top ups for 2024/2025. A transition plan will need to be put in place to support implementation.

14   Recommendations

To develop an effective review of the Banding system, there are several recommended actions that are required to support this process. These should be picked up through other pieces of work but will be captured in the delivery plan to ensure that the working group are kept up to date with the progress of these pieces of work.

1. Stop the use of the current tool for allocating banding and move to a system linked to provision in the EHCPs.
2. Separate the Banding model for mainstream schools from SRPs and special schools and develop descriptors of levels of need and provision that build on the current funding guidance. This would provide greater transparency of resourcing linked to needs and support monitoring and future planning.
3. Review the information on other LA models and levels of funding and use this to inform and calculate levels of funding linked to needs / provision in EHCPs for a future model for Hillingdon.
4. Work with Hillingdon special school leaders to understand the profile of needs of their children and young people and link this with admissions guidance and expectation of what can be provided in mainstream settings.
5. Ensure the work with schools with or due to have specialist resourced provision/ designated units includes Admissions and Transition (exit) Guidance that clarifies the level of need and the provision made as part of a graduated approach to provision.
6. Review examples of models from other LAs that provide additional funding for schools with significantly higher levels of EHCPs than other schools, clarify current issues in Hillingdon, and identify next steps.
7. Review the existing model and examples of models of early support SEND funding for pupils without the need for an EHC assessment and agree a way forward for Hillingdon.
8. Review examples of models from other LAs that provide targeted funding for pupils who would meet the admissions guidance for a special school, but a place is not yet available, and agree a way forward for Hillingdon.

Supporting Recommended Actions

9. Develop a multi-agency SEND dashboard that includes numeric data, feedback (including Parent Carer Forum Annual Report and themes from their work), themes from complaints and compliments and themes from SENDIAS casework.
10. Data should be routinely shared to support identification and delivery of priority actions, monitoring of impact / performance. This will also support identifying what we need to stop doing or do less of to focus on what needs to be done or what we need to do more of.
11. Use the review and refresh of the Ordinarily Available / SEND Support Guidance to help settings and schools to consistently identify children and young people's needs early and consistently provide effective support that leads to improved outcomes. Examples of effective local and national practice should be included, and tools provided to support appropriate referrals to additional support linked to Hillingdon processes.
12. Develop and implement sufficiency strategy that enables the majority of children and young people to have their needs met locally.
13. Put in place clear admissions and exit guidance for all specialist provision in Hillingdon.

Final