

# South Gloucestershire Council

**REPORT TO: EXECUTIVE MEMBER FOR SCHOOLS, SKILLS AND EMPLOYMENT**

**REPORT TITLE: SEND Ready Reckoner for determining the cost of providing an Education, Health and Care plan - all Wards**

## **Purpose of Report**

*To adopt the SEND Ready Reckoner (RR) as a financial calculating tool when determining the cost of providing an Education, Health and Care plan (EHC plan) for children with Special Educational Needs and Disabilities (SEND).*

## **Recommendation**

*The RR be approved for implementation. The RR will be applied to Education, Health and Care Plans that are finalised after the 1<sup>st</sup> February 2019.*

## **Policy**

### 1 Special Educational Needs and Disability Code of Practice: 0 to 25 years 2015

This is the statutory guidance for organisations which work with children and young people who have special educational needs or disabilities.

### 2 South Gloucestershire SEND Strategy - 2018

This sets out the vision and strategic priorities for South Gloucestershire Local Area for the period 2018 – 2023. The strategy was co-produced by South Gloucestershire Council, South Glos Parents and Carers and Bristol, North Somerset and South Gloucestershire Clinical Commissioning Group and has been approved by the relevant partnerships and boards.

### 3 High Needs Funding and Schools Funding and Operational Guidance 2016-2017

High needs funding is intended to provide the most appropriate support package for an individual with special educational needs (SEN) in a range of settings, taking account of parental and student choice, whilst avoiding incentives to over identify high needs pupils and students. It is also intended to support good quality alternative provision for pupils who cannot receive their education in schools. The high needs funding system supports provision for pupils and students with special educational needs and disabilities (SEND) from their early years to 25 years of age. The Children and Families Act 2014 extends local authorities' statutory duties relating to SEND across the 0 to 25 age range. A range of providers have a duty to cooperate with the local authority when making arrangements for children and young people with SEND (with a reciprocal duty on the local authority).

#### 4 Benchmarking/Census data 2017/2018

Both reports provide insight into how our SEND provision compare with other Local Authorities. It has helped us to understand where there are opportunities to improve provision and drive efficiencies as well as demonstrating where we are already performing well.

#### **Background**

- 5 South Gloucestershire Council currently uses the Matrix as a way of determining how much funding we allocate to schools for Element 3 funding.
- 6 This Matrix is a complicated and somewhat arbitrary system which assigns points based on the identified level of need and then multiplies that by a set value. This makes it very difficult for the Local Authority (LA), together with schools, to understand how the amount allocated relates to actual costs of interventions the school has to put in place to support the students.
- 7 The LA has been working with schools and parents/carers to develop an alternative way of allocating funding to schools to meet the needs of an EHC plan. This new method is known as the SEND Ready Reckoner.

#### **Pupil Educational Outcomes**

- 8 Educational outcomes for children and young people (CYP) within South Gloucestershire Schools vary. Data obtained shows that outcomes for 'all children' (incl. SEN Support/EHCPs) in the Early Years Sector are ranked in the top quartile - this suggests outcomes are good or better (see Table a) below).
- 9 CYP accessing Primary Education shows a slightly different picture. The outcomes for 'all children' shows a slight drop in performance. However, whilst CYP with EHCPs perform above national/statistical data trends, CYP accessing SEN Support perform below (see Table b)).
- 10 In the Secondary Sector 'all pupils' in South Gloucestershire perform below our National and Statistical Neighbours. Secondary Sector data shows that, compared to pupils with similar starting points, South Gloucestershire's pupils underperform across all areas – see Table c) (incl. SEN support and EHCPs). Whilst the data shows a positive trajectory for CYP, those at SEN support and with EHCPs continue to decline.
- 11 The Council has implemented a new SEND strategy which focuses on improving outcomes for SEND Pupils. The introduction of a more transparent and understandable top up calculation process through the Ready Reckoner is one important element of that strategy.

Table a) Early Years Foundation Stage

Percentage of pupils with EHCP's/SEN support achieving a Good Level of Development.

	All Pupils (2017)	SEN Support (2017)	EHCPs (2017)	All Pupils (2018)	SEN Support (2018)	EHCPs (2018)
South Glos	77%	34%	7%	77%	32%	11%
National	71%	27%	4%	72%	28%	5%
Statistical Neighbours	72%	26%	5%	73%	30%	6%

*Key academic measures 2018 DfE*

Table b) Primary Sector – KS2 Reading, Writing and Mathematics

Percentage of pupils with EHCPs achieving expected standard.

	All Pupils (2017)	SEN Support (2017)	EHCPs (2017)	All Pupils (2018)	SEN Support (2018)	EHCP (2018)
South Glos	60%	17%	9%	63%	20%	12%
National	61%	20%	8%	64%	24%	8%
Statistical Neighbours	61%	8%	8%	64%	na	na

*Key academic measures 2018 DfE*

Table c) Secondary Sector – Progress 8 (2018 data not available)

Progress pupils make from end the end of Primary (Year 6) to the end of Secondary (Year 11). It compares pupils' achievement with the average attainment of pupils nationally with similar starting points. The national average progress 8 is zero.

	All pupils (2016)	SEN Support (2016)	EHCPs (2016)	All pupils (2017)	SEN Support (2017)	EHCPs (2017)
South Glos	-0.23	-0.62	-0.96	-0.32	-0.73	-1.10
National	0.03	-0.38	-1.03	-0.03	-0.43	-1.04
Statistical Neighbours	-0.02	-0.41	-0.98	-0.08	-0.51	-0.98

*Key academic measures 2018 DfE*

## The Issues

- 12 The matrix system for SEND funding has been in place for in excess of 15 years. It has been amended over time to cover more recently identified SEN categories of need but can no longer be described as objective or transparent and does not cover the complexity of needs that are now often identified in children and young people (e.g. sensory needs/diet and mental health).
- 13 The matrix system is complicated and assigns points based on the identified level of need and then multiplies that by a set value. This makes it very difficult for the Council, Schools and parents to understand how the amount allocated relates to actual costs of interventions the school has to put in place to support the student. We also believe that it may lead to an over allocation of funding in some circumstances as evidenced by our relatively high level of element 3 spend compared to other similar LAs.

- 14 The Department for Education (DfE) provided the High Needs Benchmarking Tool (version 2) which highlights that South Gloucestershire has significantly higher Element 3 funding per head of 2-18 population. The level of funding provided by South Gloucestershire is £317 in comparison to the south west average of £212 and our five closest statistical neighbours at £158. The total spend for the whole of England is £217 per pupil. South Gloucestershire is currently £100 in excess of the all England average (see pages 13 and 14 for a full explanation).
- 15 The key benefit of the SEND Ready Reckoner is that the costs are fixed and funding is transparent; schools, parents and the LA can be clear on what is being allocated. More details about the SEND Ready Reckoner and its roll out are available in Appendix 1 of this report. Section 9.96 of the Special educational needs and disability code of practice: 0 to 25 years states “Local Authorities **must** provide information on Personal Budgets as part of the Local Offer”. The Ready Reckoner will allow an easier method of presenting the holistic nature of funding for an EHC plan. The Ready Reckoner through its format will allow an individual learner’s provision, as specified in the EHC plan, to be quantified and specified.
- 16 EHC plans will need to be more specific and quantifiable in order to assign the level of funding to be attached to each EHC plan. This is in line with what schools and parents have requested and is a requirement of the SEND Code of Practice 2015 and the Children and Families Act 2014.

## Consultation

- 17 Between September 2017 and July 2018, the Schools Forum High Needs Working Group (HNWG) has been engaged in the design and development of the SEND Ready Reckoner. The SEND Ready Reckoner has also been the subject of a pilot, feedback from which has been taken into consideration in designing the final version.
- 18 Further information regarding the SEND Ready Reckoner and its pilot and recommendations can be found from minutes discussed at the Schools Forum on 14 September 2017 (pages 6 -11) and 12 July 2018 (pages 18-22). A summary of the recommendations are listed below:
- EHC plans needed to be clearer and more specific so that they can be costed more accurately.
  - If the school feel that they need a higher (or lower) level of funding they will be asked to provide a costed provision map highlighting what provision is needed and this will be considered by the LA.
  - The pilot highlighted that schools use different hourly rates for teaching assistants. There needed to be a consistent hourly rate used.
  - Consideration to use the Ready Reckoner for Resource Bases as well as schools.

- 19 The parents and carers of children and young people with SEND overall have welcomed the clear transparency of the SEND Ready Reckoner. They would like to see the statement produced by the SEND Ready Reckoner and the costs attached to each element of the plan. They also believe that clear transparency would end any disputes between schools and parents of children and young people with EHC plans over the provision being provided.
- 20 The application of the Ready Reckoner will be on a case by case basis costing the provision identified in an individual EHCP on a transparent and accurate basis ensuring each school receives the correct allocation of funding to support each individual pupil.

### **Equalities Considerations**

- 21 A full Equality Impact Assessment and Analysis (EqIAA) has been undertaken and is shown at Appendix 2 to this report. The EqIAA assesses a wealth of data and information, both in regard to pupils and schools and as such is comprehensive in its analysis of equalities related issues emerging. The EqIAA has identified a negative impact in respect of an implementation of the SEND Ready Reckoner. This is because Element 3 funding would reduce for pupils in mainstream schools who are currently in receipt of matrix funding and those proportionately more likely to be negatively impacted would be: disabled people/people with SEND, particularly those with an identified primary need of ASD (Autistic Spectrum Disorder), SLCN (Speech Language and Communication Needs) and SEMH (Social, Emotional and Mental Health); younger people (which is clear as all those impacted are CYP), boys, pupils from a 'Black' ethnic background, and pupils in mainstream schools funded by matrix units.
- 22 In respect of schools, the common characteristics shared by schools experiencing a reduction in funding as a result of an implementation of the SEND Ready Reckoner are: mainly small to medium sized primary schools, all have a larger than average number of students with EHCPs on roll, all the schools have an average size of between 100 - 200 students, and schools with EHCPs with a higher number of units attached are more likely to experience a reduction.
- 23 The EqIAA recommends that any decision should take full account of these impacts and be balanced against the information which shows the amount of funding available for Element 3.
- 24 A very important aspect to protect individual pupils support arrangements is that the application of the Ready Reckoner will be on a case by case basis costing the provision identified in an individual EHCP on a transparent and accurate basis ensuring each school receives a reasonable and correct allocation of funding to support each individual pupil's needs as identified in their EHCP.

## Alternative Options Considered

25 The alternatives options considered are:

Option	Benefits	Disadvantages
Continue to use of the Matrix system.	Schools are familiar with this model.	<p>Schools are unclear as to what the core funding should cover and therefore when to request or expect access to element 3. Funding.</p> <p>There is variance in the cost of staff in similar roles across schools. As a result, an allocation of matrix funding might support X level of hours of a Teaching Assistance in one school but Y level in another.</p> <p>The Matrix system does not specify within it the type of need for some children and young people.</p>
Develop a Banding system so that one model is used to share money amongst all young children and adults between 0-25 years regardless of where they are being educated and how old they are.	<p>Benefits would not be immediate, because there would need to involve a further period of consultation.</p> <p>The use of the Ready Reckoner will compliment any future single banding system and is something that is planned as a longer term initiative in South Glos.</p>	If the banding levels are not set correctly this could have more negative impact on the High Needs block.

## Risk Assessment

### Financial Implications (includes tax implications such as VAT)

- 26 The introduction of the Ready Reckoner will give a clear and transparent costing of an EHC plan for young people in maintained schools, academies and free schools.
- 27 The current funding for high needs learners in maintained schools within South Gloucestershire is significantly higher than both our statistical neighbours and nationally.
- 28 With the introduction of the Ready Reckoner it is anticipated our current spending levels on high needs provision in maintained schools will become comparable with our statistical neighbours and nationally.
- 29 This will help to reduce the current spending pressures within the Dedicated Schools Grant.

30 However if EHC plans are to be more specific and quantifiable about the level of funding attached this may result in an increase on high needs funding.

**Caroline Warren, Finance Business Partner, T 01454 863153**

### **Legal Implications**

31 The High Needs funding 2019 to 2020 Guidance, dated September 2018 requires a Local Authority to work with institutions that have pupils or students with high needs to ensure there are clear processes for determining and allocating top-up funding.

32 Furthermore, local authorities must treat those placed in maintained provision, in academies and free schools, in the further education sector, and in non-maintained and independent provision on a fair and equivalent basis when making arrangements for funding young people with high needs.”

33 The Special educational needs and disability code of practice: *0 to 25 years Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities dated January 2015* requires a local Authority to provide top-up funding, to enable a pupil or student with high needs to participate in education and learning and should reflect the costs of additional support to meet the individual pupil or student’s needs. The final allocation of funding must be sufficient to secure the agreed provision specified in any EHC plan.” *The implementation of the Ready Reckoner must therefore ensure that the local authority complies with this.*

**Maria Sweetman, Solicitor, Tel 01454 86 4229**

### **Human Resources Implications**

34 Decisions taken regarding funding may have an impact on the workforce of council maintained schools. The potential Human Resource implications will need to be considered and managed by each school, in line with their delegated responsibilities and required procedures, including consultation. As all maintained schools in South Gloucestershire have chosen to be supported by Integra HR, the council’s traded arm, they will continue to receive support when considering / implementing any changes they choose to make through well-established workforce change procedures.

**Nicola Plant, Human Resources Business Partner, T 01454 86 3093**

### **Environmental Implications**

35 There are no significant environmental implications arising from this report.

**Nicola Melville, Senior Environment and Climate Change Officer, T 01454 863328**

### **Social Implications**

36 The Equalities Impact Assessment identifies and refers to all the social implications arising from this report (appendix 2).

**Mark Pullin, Strong, Safer Communities Manager, T 01454 868010**

### **Economic Implications**

37 There are no direct economic implications arising from this report. Directing SEND budget appropriately to those who need it most can enable the best possible life outcomes and can improve young people's chances of becoming economically active.

**Antony Merritt, Strategic Economic Development Manager, T 01454 863870**

### **Privacy Impact Assessment**

38 A PIA assessment is not needed as there is no change no major change in the data needed apart from it being more quantifiable.

### **Risks, Mitigations & Opportunities**

39 There remains a significant risk to the local authority if the provision for children and young people with SEND does not become more transparent and quantifiable to all parties concerned (parents/carers/the student and South Gloucestershire educational providers).

### **Reasons for Decision**

To have in place a more clear and transparent method of calculating costs for element 3 funding. The costs will be fixed and funding transparent. Schools, parents and the LA will be clear on what is being allocated to an individual learner.

### **Author**

**Chris Sivers, Director for Children, Adults and Health**

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### **Background Papers**



## Schools Forum Reports

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-14-Sept17.pdf>

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-12-July-18.pdf>

## South Gloucestershire Send Strategy 2018

<http://www.southglos.gov.uk/documents/Draft-SEND-Strategy-2018-23.pdf>

## Benchmarking Data 2017/2018

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/751559/High\\_Needs\\_LA\\_Benchmarking\\_Tool\\_v4.xlsm](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751559/High_Needs_LA_Benchmarking_Tool_v4.xlsm)

## Financial Regulations and Schools Operational Guidance 2016-2017

<https://www.gov.uk/government/publications/schools-funding-arrangements-2016-to-2017>

## **Appendix 1**

### **SEND Ready Reckoner – What is it?**

- A tool to identify funding levels by the Local Authority (LA) for children and young people (CYP) who are in receipt of an Education, Health and Care plan (EHC plan).
- Designed to ensure that schools receive the level of funding that is transparent and set at a level that ensures the pupils' needs, as identified on the EHC plan, can be met by the school.
- Calculates the amount of funding using pre-populated costings.
- The specified provision and interventions as outlined in Section F of an EHC plan would be used to determine the total amount of funding allocated to the school or educational setting to meet an individual learner's special educational need(s).
- Schools would be informed of the level of funding arrived at.
- Schools would be able to respond and discuss the level allocated by the SEND ready reckoner, but it will remain the LA's decision on the level of funding allocated to the EHC plan.
- The tool standardises staffing and other costs which are then fixed.
- The level of funding allocated would follow the CYP no matter what mainstream school they attend (i.e. Academies, Free Schools or LA maintained schools).
- The pre-populated costings would be looked at yearly.
- A costed provision map can be printed and would be sent to schools and parents on request.
- It subtracts the £6,000 notional monies which are already in schools budgets.
- It would ensure EHC plans are specific and quantifiable

## Appendix 2

### EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

#### SEND Ready Reckoner

This document describes an assessment of equalities impacts in relation to the use of the SEND Ready Reckoner as a calculation tool for assessing pupils fund allocation at the time of their annual review.

#### SECTION 1 – INTRODUCTION

The Council currently uses a way of determining how much funding it allocates to pupils for Element 3 funding which is now outdated. It is a complicated and somewhat arbitrary system that assigns points based on the identified level of need and then multiplies that by a set value. As a result, which is borne out by informal stakeholder feedback received on a continual basis, the current system makes it very difficult for the for the Council, schools themselves and parents and carers, as well as all other stakeholders to understand how the amount of Element 3 funding allocated relates to actual costs of interventions that the school needs to put in place to support the student.

The SEND Ready Reckoner is a calculation tool that costs out the funding needed to support any EHCP (see appendix 1 for a template and easy read explanation of the Ready Reckoner). All costs used are fixed and it is a highly transparent way that schools, parents and carers, all stakeholders and the LA can be clear on the Element 3 funding that is being allocated. As a result, the SEND Ready Reckoner encourages EHCPs to be more specific and quantifiable about the level of funding attached to each EHC plan. This is in-line with what schools and parents have requested and is a requirement of the SEND Code of Practice 2015 and the Children and Families Act 2014.

The SEND Ready Reckoner has been developed to replace the current 'matrix system' of SEND funding and is an approach used by other Local Authorities in England. The matrix system is only used for pupils in mainstream schools and it is not used for the calculation of funding for pupils placed at **specialist provision including resource bases, units and special schools**.

The Ready Reckoner is not designed to be a cost cutting tool. The Ready Reckoner ensures that schools receive enough Element 3 funding to cover provision needed under the EHCP; the tool is designed so that there is transparency in the funding which students receive and which is set at a level that ensures the pupil's needs, as identified on the EHC plan, can be met by the school.

As previously mentioned further information regarding the Ready Reckoner and its pilot and recommendations can be found from minutes discussed at the Schools Forum on 14<sup>th</sup> September 2017 (pages 6 -11) and 12<sup>th</sup> July 2018 (pages 18-22).

## SECTION 2 – RESEARCH AND CONSULTATION

The following data is set out in order to build a picture of impacts in respect of ‘Protected Characteristic’ groups.

The SEND Ready Reckoner applies to pupils who are in receipt of matrix funding in Mainstream schools. Therefore, out of the 1,800 pupils in receipt of an EHCP in South Gloucestershire, just under 650 would be impacted by the introduction of the SEND Ready Reckoner.

### Protected Characteristics of those impacted by an introduction of the SEND Ready Reckoner

#### Age and Disability/SEND

Table 1 below shows the primary needs of all pupils currently in receipt of ‘matrix funded’ EHCPs in mainstream schools in South Gloucestershire. These are the pupils who would be impacted should the SEND Ready Reckoner be introduced.

**Table 1:- Table to show the number of students in South Gloucestershire currently in receipt of ‘matrix funding’ as disaggregated by Age and Primary Need.**

Year Group	ASD	HI	Medical	MLD	MSI	PD	PMLD	SEMH	SLCN	SLD	SpLD	VI	Total
Pre	5	2		3		5	3		6	2	1	1	28
1	13	1	3	2		5	3	3	20		1	2	53
2	10		1	4		3	1	8	26	2		1	56
3	21	3	2	3		2	1	13	23	2			70
4	16	2		5	1	6		12	12		4	1	59
5	12	3		7		9	1	6	14	1	2	1	56
6	13	3		11	1	3	1	13	12		2		59
7	9	2	2	8		7		11	2	1	4	1	47
8	12			6		5		10	5		5		43
9	6			8		3		10	10	1	1	1	40
10	10			11		3		8	8		1		41
11	17	2		2		2		8	5	1	3	2	42
12	7			3		4		7	2		1	1	25
13	7	1	1					3	2		1		15
Post 16	2								2			1	5
Post 16	1		1						1				3
<b>Grand Total</b>	<b>161</b>	<b>19</b>	<b>10</b>	<b>73</b>	<b>2</b>	<b>57</b>	<b>10</b>	<b>112</b>	<b>150</b>	<b>10</b>	<b>26</b>	<b>12</b>	<b>642</b>
<b>Grand Total as a percentage of all pupils</b>	<b>25%</b>	<b>3%</b>	<b>2%</b>	<b>11%</b>	<b>0%</b>	<b>9%</b>	<b>2%</b>	<b>17%</b>	<b>23%</b>	<b>2%</b>	<b>4%</b>	<b>2%</b>	

Source: Oct 2018 EHCP Dashboard South Glos

The table shows that students with ASD, SLD and SEMH account for 65% of the total. The table also shows that pupils in primary years 2, 3, 4, 5 and 6 account for 47% of the total i.e. these are the year groups that hold the most number of EHCPs.

**Table 1 – Key**

<i>ASD = Autistic Spectrum Disorder</i>	<i>PMLD = Profound and Multiple Learning Difficulty</i>
<i>HI = Hearing Impairment</i>	<i>SEMH = Social, Emotional and Mental Health</i>
<i>Medical – Primarily medical need</i>	<i>SLCN = Speech Language and Communication Needs</i>
<i>MLD = Moderate Learning Difficulty</i>	<i>SLD = Severe Learning Difficulty</i>
<i>MSI = Multiple Sensory Impairment</i>	<i>SpLD = Specific Learning Difficulties</i>
<i>PD = Physical Disability</i>	<i>VI = Visual Impairment</i>

## **Ethnicity**

The table below shows the ethnicity of all pupils currently in receipt of ‘matrix funded’ EHCPs in mainstream schools in South Gloucestershire. These are the pupils who would be impacted should the SEND Ready Reckoner be introduced.

**Table 2:- Table to show the ethnicity of students currently in receipt of ‘matrix funded’ plans in South Gloucestershire**

<b>Ethnicity</b>	<b>Percentage</b>	<b>All pupils in South Glos.</b>
Asian/Asian British - Indian	0.78%	3.30%
Asian/Asian British - Other	0.31%	
Asian/Asian British - Pakistani	0.47%	
Black/Black British - African	1.56%	1.60%
Black/Black British – Caribbean	0.31%	
Black/Black British - Other	0.62%	
Mixed/Multiple Ethnic Groups - Other	1.71%	4.90%
Mixed/Multiple Ethnic Groups - White & Asian	0.78%	
Mixed/Multiple Ethnic Groups - White & Black Caribbean	1.56%	
Not Obtained	1.87%	1.10%
Any other Ethnic Group	0.47%	0.50%
White – English/Welsh/Scottish/Northern Irish/British	85.05%	83.90%
White – Irish	0.15%	0.3%
White – Gypsy/Traveller of Irish heritage	0.15%	0.3%
White - Other	4.18%	4.70%

Source: Oct 2018 EHCP Dashboard South Glos

Table 2 shows that students from “Black” backgrounds are overrepresented (2.49% versus 1.60%) within the cohort currently in receipt of matrix funded EHCPs when compared to the total pupil population in South Gloucestershire.

### **Sex**

The table below shows the sex of all pupils currently in receipt of ‘matrix funded’ EHCPs in mainstream schools in South Gloucestershire. These are the pupils who would be impacted should the SEND Ready Reckoner be introduced.

**Table 3:- Table to show the sex of students currently in receipt of ‘matrix funded’ plans in South Gloucestershire**

<b>Sex</b>	<b>Boys</b>	<b>Girls</b>	<b>TOTAL</b>
Number of Students	475	167	<b>642</b>

*Source: Oct 2018 EHCP Dashboard South Glos*

Of the children and young people with EHC plans in South Gloucestershire, 74% of them are boys. This figure is as expected since the incidence rate of SEND nationally is higher in boys than in girls. This is for a number of reasons:

- There are more genetic syndromes that affect boys than girls and boys are more likely to be referred for a medical diagnosis.
- Females are less likely to be identified with SEND as their behaviours are less likely to bring them to the attention of education and health professionals.

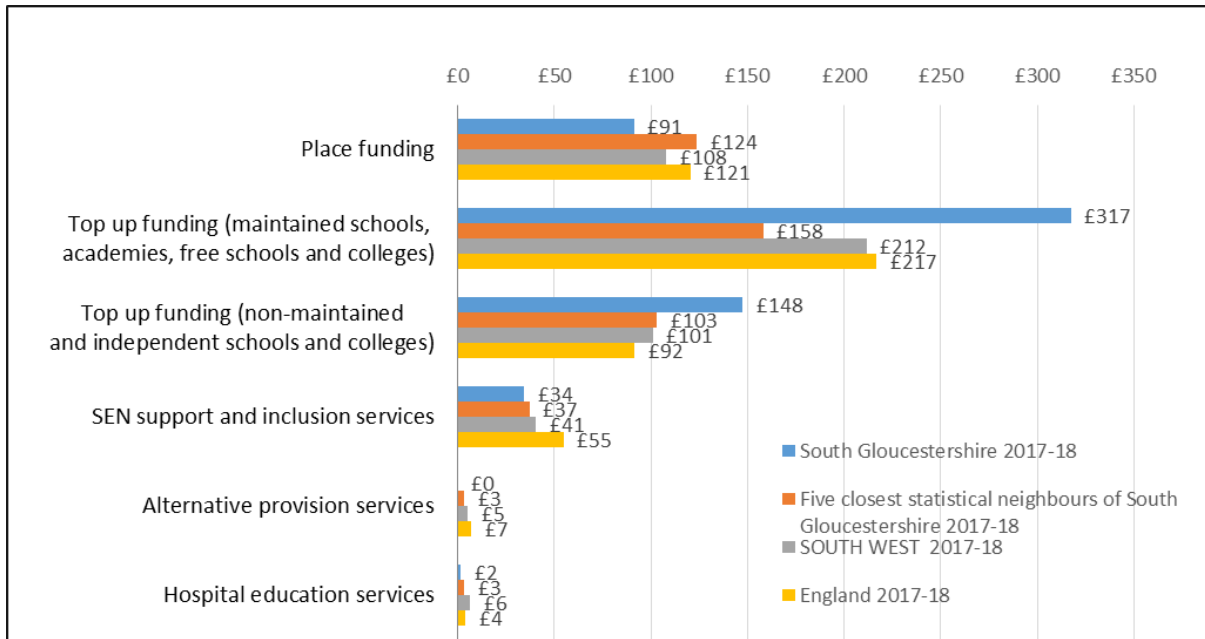
### **SECTION 3 – IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS**

The research shows that those impacted by an introduction of the SEND Ready Reckoner would be pupil’s currently in receipt of matrix funding in mainstream schools; this is currently 642 pupils. Of these pupils:

- 100% fall under the Protected Characteristic of ‘Age’ as they are all children and young people.
- Those in the younger age groups are proportionately more likely to be impacted as pupils in primary years 2, 3, 4, 5 and 6 account for 47% of the total.
- 100% are likely to fall under the Protected Characteristic of ‘Disability’, with pupils with ASD, SLD and SEMH being proportionately more likely to be impacted as they account for 65% of the total.
- Boys would be proportionately more likely to be impacted than girls as they account for 74% of the total.

- 2.48% are from a “Black” background (i.e. the Protected Characteristic of “Race”) compared to 1.60% in the total pupil population.
- The following data display information regarding spend per head in South Gloucestershire as compared to other Local Authorities.

**Chart 1:- Chart to show spend per head of 2 – 18 population in regard to different aspects of provision.**



Source: Department for Education Benchmarking Tool – Version 2 2017-18

The chart above shows the spend per head of 2 – 18 population in regard to different aspects of provision. It shows that ‘top up funding’ (i.e. Element 3 funding) is £317 per head in South Gloucestershire.

The table below shows the same findings as those shown in the above chart in an easy to read table.

**Table 4:- Table to show spend per head of 2 – 18 population in regard to different aspects of provision**

Provision	South Glos (£)	Five Statistical Neighbours (£)	South West (£)	England (£)
Place Funding	91	124	108	121
Top up Funding – maintained	317	158	212	217
Top up Funding – non maintained	148	103	101	92
SEN support	34	37	41	55
Alternative Provision	0	3	5	7
Hospital Education	2	3	6	4

Source: Department for Education Benchmarking Tool – Version 2 2017-18

The above chart and table show how South Gloucestershire currently spends more on Top up funding (Element 3 funding) per head of 2-18 population than other Local Authorities. However, for place funding (which includes Elements 1 and 2 funding), the spend is less than other Local Authorities. This demonstrates that students are potentially attracting less funding before the SEND process even begins.

### Impact - Pupils

Table 5 shows the different impact on a random sample of pupils in receipt of matrix funded EHCPs in mainstream primary and secondary schools before and after the SEND Ready Reckoner is applied.

The final columns show the reduction in £ per year and what the reduction would be when expressed in terms of teaching assistant hours.

The data within the table is based on a diverse selection of schools and pupils in South Gloucestershire in order to provide a full range and variety of examples.



**Table 5 – Table to show ‘matrix funding’ versus SEND Ready Reckoner funding in a range of example scenarios**

Type of Provision	Description of Need	School	Current Funding Level	Ready Reckoner Funding £ per year	Reduction in £ per	Reduction in hours per week
Mainstream Primary	ASD - Pupil 1	School 1	9612	5208	4404	7.40
	PD - Pupil 2	School 2	11452	6025	5427	9.11
	HI - Pupil 3	School 3	2396	2002	394	0.66
	VI - Pupil 4	School 4	9471	5146	4325	7.26
	SLCN - Pupil 5	School 5	16263	8164	8099	13.60
	SEMH - Pupil 6	School 6	12867	6655	6212	10.43
	MLD - Pupil 7	School 7	9612	5208	4404	7.40
	SpLd - Pupil 8	School 8	8622	4769	3853	6.47
Mainstream Secondary	ASD - Pupil 9	School 9	14423	7345	7078	11.89
	PD - Pupil 10	School 10	18951	9357	9594	16.11
	HI - Pupil 11	School 12	7914	4454	3460	5.81
	VI - Pupil 12	School 13	12584	6528	6056	10.17
	SLCN - Pupil 13	School 14	2396	2002	394	0.66
	SEMH - Pupil 14	School 15	10178	5460	4718	7.92
	MLD - Pupil 15	School 16	12156	6337	5819	9.77
	SpLd - Pupil 16	School 17	11452	6025	5427	9.11

Source: 2018/2019 Forecast spend on schools with the ready reckoner applied

**NB. Assumptions made in tables:**

- The “Reduction in Hours per Week” column is based on the hourly rate of Teaching Assistant – £15.27 working 39 hours a week;
- Current Funding Level – based on 2017/2018 figures and most recent pay run.

**Table 5 – Key**

ASD = Autistic Spectrum Disorder  
 HI = Hearing Impairment  
 Medical – Primarily medical need  
 MLD = Moderate Learning Difficulty  
 MSI = Multiple Sensory Impairment  
 PD = Physical Disability

PMLD = Profound and Multiple Learning Difficulty  
 SEMH = Social, Emotional and Mental Health  
 SLCN = Speech Language and Communication Needs  
 SLD = Severe Learning Difficulty  
 SpLD = Specific Learning Difficulties  
 VI = Visual Impairment

The table shows that in all cases the amount of funding is reduced. However, as previously mentioned, the SEND Ready Reckoner ensures that schools receive enough Element 3 funding to cover provision needed under the EHCP.

## Impact - Schools

The table below provides an indication of the reduction in funding for a particular school if you were to divide all pupil funding by the total number of pupils in the school before and after the implementation of the Ready Reckoner. The data within the table is based on a diverse selection of schools and pupils in South Gloucestershire in order to provide a full range and variety of examples

**Table 6:- Table to show average reduction in funding for schools.**

School	2018/19 Base £	Number of pupils	Number of EHCPs	SEND Ready Reckoner Base £	SEND Ready Reckoner % change
School 1	4,878	166	9	4,302	-11.80%
School 2	4,591	179	6	4,161	-9.40%
School 3	4,265	146	4	3,924	-8.00%
School 4	5,081	104	4	4,684	-7.80%
School 5	5,072	97	1	4,709	-7.20%
School 6	6,838	121	8	6,420	-6.10%
School 7	4,116	181	4	3,879	-5.80%
School 8	4,259	137	3	4,024	-5.50%
School 9	4,022	265	6	3,804	-5.40%
School 10	3,958	170	4	3,770	-4.70%

Source: 2018/2019 Forecast spend on schools with ready reckoner applied

The common characteristics shared by schools experiencing a reduction in funding as a result of the implementation of the SEND Ready Reckoner are:

- Mainly small to medium sized primary schools.
- All have a larger **than average number of students with EHCPs on roll.**
- All the schools have an average size of between 100 - 200 students.
- Schools with EHCPs with a higher number of units attached are more likely to experience a reduction.

## Further notes

Any School with pupils in a Resource Base would not be impacted as their funding would not change (they are funded through a banding system). These schools may, however, have pupils in mainstream who are funded through the matrix system and will be impacted.

Special schools are not funded by matrix units and are protected by the national minimum funding guarantee and therefore, are not impacted.

Funding through the SEND Ready Reckoner is set at a rate which will ensure that the money will be enough to meet pupils' needs. South Gloucestershire are committed to ensuring that all the provisions identified in Section F of the EHC plan will be met and covered by the level of funding issued. The SEND Ready Reckoner ensures that schools receive enough Element 3 funding to cover provision needed under the EHCP.

Any change in funding made available to schools for pupils with EHCPs would not have an impact on other pupils in mainstream education.

## SECTION 4 - EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input checked="" type="checkbox"/>	<p>A negative impact has been identified in respect of any implementation of the SEND Ready Reckoner. This is because Element 3 funding for pupils would reduce for pupils in mainstream schools on matrix funding.</p> <p>Those proportionately more likely to be negatively impacted would be:</p> <ul style="list-style-type: none"> <li>• Disabled people/people with SEND, particularly those with an identified primary need of ASD, SLCN and SEMH</li> <li>• Younger people</li> <li>• Boys</li> <li>• Pupils from a 'Black' background</li> <li>• Pupils in mainstream schools funded by matrix units.</li> </ul> <p>The common characteristics shared by schools experiencing a reduction in funding as a result of the implementation of the SEND Ready Reckoner are:</p> <ul style="list-style-type: none"> <li>• Mainly small to medium sized primary schools.</li> <li>• All have a larger <b>than average number of students with EHCPs on roll.</b></li> <li>• All the schools have an average size of between 100 - 200 students.</li> <li>• Schools with EHCPs with a higher number of units attached are more likely to experience a reduction.</li> </ul> <p>Any decision should be balanced against the information which shows the comparisons against other LAs and the amount of funding available for Element 3.</p>
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

## **SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA**

1. Ensure that application of the SEND Ready Reckoner is sufficiently responsive to changes in the number and needs of pupils, and so that flexibility in application is ensured where appropriate.
2. The SEND Partnership Board will carry out monitoring in respect of the above action (1. above) and in respect of ongoing impacts of implementation of the SEND Ready Reckoner.
3. Formulate and implement an action plan aimed at increasing the ability of all schools to deliver effective inclusion.

## **SECTION 6 - EVIDENCE INFORMING THIS EqIAA**

Schools Forum articles Sept 2017 and July 2018  
0-25 Education Data Dashboard 2018  
Schools key measures 2018 v 1.7 DfE  
EHCP Dashboard South Glos Oct 2018  
2018/2019 Forecast spend on schools with ready reckoner applied  
SEND Strategy 2018 - 2023  
SEND data return 2017  
Department for Education Benchmarking Tool – Version 2 2017-18

Schools Forum Reports:

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-14-Sept17.pdf>

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-12-July-18.pdf>

Minutes from School Forum – October 2017 (following Sept 2017 meeting)

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-19oct17.pdf>

Minutes from School Forum – September 2018 (following July 2018 meeting)

<http://www.southglos.gov.uk/documents/Schools-Forum-Agenda-and-Papers-for-20-Sept-18.pdf>