Date: 27th February 2015

Response to the Department of Education's SEN Funding Consultations

The National Network of Parent Carer Forums is a network of over 150 Parent Carer Forums in England.

The forums are arranged into 9 regions and these follow the same regional breakdown as the Department of Education; each of the regions has a regional representative. All regional representatives' work together to form the national steering group.

The NNPCF is a network of local forums meeting in regional settings, working together to effect local and national service improvement through participation and co-production with parent carers.

Q1	We feel they are many factors that would impact on this need to be considered such as, looked after children, English as a second language, IDACI deprivation indicators and numbers of EHCP. It is a challenge to develop a banding system around as national they is some disparate around the country, it might only work if everyone was in the same place. Concern that proxy factors might work SEN but not SEN alongside disability. Distribution of funding should be needs driven
Q2	Formula should be on needs basis (via EHCPs) not historical pattern as some counties have very poor provision for e.g. residential care or short breaks and improved provision is needed. Question around if health funding should be part of the formula? Also if it was developed with how many schools they are taking into context they types of schools they are and what they agendas are?
Q3	At the moment LA already collaborate with out of area placement, but there needs to be some planning around what the LA do not provide and how best to commission in their own area working alongside the stakeholder so do this. Capital funding enabling local authorities to capital projects together for specialist support, i.e. autism specific Definitely some benefits for collaborative working, but also maybe some pitfalls, particularly for smaller local authorities Need to be collaboration re CYP with very complex needs to help develop this area

Q4	Yes. Provisions should be on needs basis not proxy factors and not sure the current ones are fit for purpose
Q5	Concern that proxy factors are likely to mislead especially when D for is in the SEND. We feel it is better to not to use proxy when it comes to high need funding and this needs to be down individual need. There is better equality in local distribution according to need instead of it becoming a postcode lottery
Q6	Whilst we recognize this happens in some areas and is a good proposal, perhaps some transpancy should be given towards this to stop those who make most noise getting heard when it comes to allocation. Also we suggest it could focus on schools which are most local to those currently going to other resource basis, so they can remain in local communities
Q7	Bureaucratic process currently in place, which is time consuming etc. in supplying, would suggest funding come to the local authority for distribution with a clear pathway for this to be done. It would be a challenge for distribution to come straight from GOV to all SEND providers, making this process a greater challenge for families to understand.
Q8	At moment there are examples out there of how budgets from NHS are working with social care but in limited places such as CHC funding. Challenging the status quo of how NHS funding works would be a start as and looking at the mechanism of how agreement is sought jointly. The new 'Manchester' model may be a way forward for providing truly joint and seamless provision.
Q9	This is where creative thinking is needed when it comes to personal budgets, one LA are already looking on what is out there in funding and seeing where they can 'slice' small amount towards personal budgets ready for the influx of requests. When it comes to SEN PB that will be a challenge for schools who already have the monies. The less the LAs have to distribute, the less flexible they can be and the less tailored will be provision, making outcome-driven funding less likely. LAs are likely to offer basal funding only.
Q10	Don't know
Q11	It is felt since LA Capital funding to schools has reduced and the Building Schools for the Future ended and additional funds for converting to academy status finished, this remains a challenge. Special cases for large capital spending have to be made, often direct to Government but since 'austerity' this has been extremely difficult and limited.
Q12	It has been shown that this has been taken from other funds as it is not ring fenced.
Q13	It is reported that this does not always happen, as the new provision replaces the old provision or it is re-distributed geographically
Q14	Yes they do take this into consideration when it comes to placements. In some areas this is given strong consideration when it comes out of out placements.
Q15	Unsure as each area is very different
Q16	Each area approaches this differently on how they bring data together, school census

	twice a year are used, whilst taking into account population increase is another factor as well.
Q17	Some areas transport costs are pooled together in rural areas. If this is considered it would have to be done on an area bases otherwise a blanket policy would impact and not deliver a creative way to use pooled budgets.
Q18	Funding needs to be ring fenced to specialist provision Possible process for major adaptations (although difficult if linked to proxy indicators) Distinction between minor and major adaptations Cluster allocations of capital funding Efficient, tailor-made provision is required which will serve the whole community better e.g. maximise use not just 9am-4pm, term time. 'Hub' model for provision.

National Network of Parent Carer Forums
On behalf of the NNPCF Steering Group