

Early Years Special Education Inclusion Funding Appendix 2 - Comments from the Consultation

Question 1 - Additional EY's SEND funding could only be allocated by reducing the hourly NEF rate to cover any increased costs.

Do you agree with the principle of maintaining the current NEF hourly rates, without adding additional resource into the EY's SEND funding?

That is suggesting that you give with one hand and take with the other - pointless

We are only just scrapping through with the rates as it is, so reducing them could cause more nurseries to close, which would mean less spaces for SEND available. Not all nurseries have large numbers of SEND children to help cover the costs

it is difficult to support the children on the current rate

As the majority of our children use funded hours and these already don't cover the cost of running our setting, the thought of reducing the hourly rate will either force our hand to pass the reduction on to parents in some way or close our doors

The NEF funding is low enough as it is - reducing it would cause more issues for providers. If there is not enough funding for SEND children then the Government needs to come up with a way to make more money available

This is not a solution. You can't cut off one to add onto another. It will not help any setting. Don't increase the funding for SEND and settings will start to refuse to take them. Cut NEF and settings won't afford to provide resources to meet EYs. No one will win!

Nursery's would not be able to function on a lower NEF rate and this should at least be maintained. If the NEF rate is reduced to allocate funding to SEND this will significantly impact the general running of nurseries. Therefore, even if settings have a large number of SEND children; their basic offer would be reduced and the pressure of having the children with SEND would be similar to it is now. If a setting has low numbers of SEND, it would be asking them to function on less than they do now and this would not be possible. However, I do not agree that additional resources should not be added to EY SEND funding for some children, particularly the most significant.

If we are referring to the challenge/exceptional funding, I feel that this should be reviewed and increased. With the NEF hours and extra hours some children attend, the challenge funding does not even meet the national minimum wage of hiring a 1:1. We had a child attending 40 hours in receipt of Exceptional funding attending 40 hours per week, as their funding was stretched the exceptional only covered 22 hours per week. It is hardly fair that settings are to supplement this further or for settings to recoup the costs from the families in order for the wages of their 1:1 to meet. Then there is the added cost of completing the necessary paperwork essential for these children to be assessed for an EHCNA. . Which then leads me to highlight the funding gap between a school setting and group provision once an EHCP has been Granted. This funding remains the same where a school setting is awarded a much higher funding rate (after the group provision has completed the hard task of securing the EHCP in the first place).

However the Graduated Response supplement for each stage 2, 3 and 4 I believe is sufficient.

Some of our children get deprivation funding and then move to EYPP just because of their postcode. They do not have gaps in their learning and parents are not struggling financially and don't need support for extra sessions etc if this was targeted better then there would be additional funding for children with complex needs.

I think the question is unclear.

Too many children are in need of support but there is not sufficient funding to meet their needs as it cannot fund additional adults.

I do think settings need additional EY SEND funding but it can't be to the detriment of the NEF hourly rate. It is already impossible to cover salaries, on costs and overheads with the current hourly rate.

The current NEF rate needs to be maintained, however SEND funding is also needed

It is already very difficult to maintain the cost of staffing to child ratio at the current funding level. If the amount is reduced it would put the Pre School and the school into further deficit and mean we may have to think about closing. I fundamentally disagree.

The hourly NEF rate is already insufficient and children without SEND should not be penalised anymore than they are.

My preschool would not be sustainable if you reduce the NEF funding rates. I only just about cover costs now with all the extra costs from our government to run a small business Reducing the NEF rate will cripple me..... Although the SEN funding is abysmal I am coping at the present time.

We are seeing more children arriving with additional needs but funding is currently not enough to employ additional staff where 1:1 support is needed

nurseries are being compromised budget wise currently without the rates being reduced. Additional send budget should recognise the additional needs within the setting and support settings in ensuring that everything can be done to support the child

More funding is required due to the high percentage of children in Early Years with more complex needs and the capacity to meet their needs.

Children with SEND need additional resources.

For children who need additional staffing, the amount offered doesn't cover the full amount of support needed.

All children including those with SEND need to be funded on what their provision costs- no one child is more deserving than any other but all children deserve to have a provision that meets their needs

More funding is needed for SEND pupils in EYFS setting with complex needs. We have children who are non-verbal, have no awareness of dangers, cannot feed themselves or operate without a 1:1. We are currently using existing staff to support need but this is taking away TAs from other work in the school e.g. interventions, supporting the class teacher, reading groups, lunchtime supervision. We are exhausting all adults in the school with no extra funding!

why take it off one to give us the same amount?

We are having a increasing number of children with complex Send issue requiring reduce ratios and we already do not get the money to cover the additional staffing. We currently have 5 complex SEND children in our pre-school room and out of them 3 are on the EHCP pathway and we are struggling to meet needs. Sadly there is more children with additional needs and not enough places or support for them we are letting them down.

I can't see how you can take money away from providers when many are struggling to make ends meet as it is.

We would not be able to meet the needs of children with additional needs in our setting without additional funding. However if the hourly NEF rate was reduced, we would become financially unviable and we would have no option but to consider closing our nursery and pre school provision

Just because a child does not present with send doesn't mean they don't deserve a high quality provision that the current rate just about funds.

Just because a child doesn't present SEN doesn't mean they dont deserve a high quality early years provision, which is what the current NEF funds.

The current NEF hourly rate should absolutely not be reduced, we should be prioritising the most vulnerable youngest people in our community and the support they receive without further punishing the rest of the children and the funding they receive to pay for their early education., The council and government needs to cut back spending on other ridiculous things that should not be used to waste council tax payers money!! For example the budget shows that only £168 M went into investing in the future of our children, including those most vulnerable, however £322 M went into Adult Social Care. I

think if we invested more time into our young children now, less would grow up with mental health and less would fall into adult social care needs.

I would like to see current NEF rates at least maintained with additional funding for SEND

I believe the eligibility for the NEF entitlement could be reviewed, reflecting priority for lower-income families being entitled, and therefore, the additional money could be used to support SEND funding.

the current NEF hourly rates do not match what we as a nursery need to charge hourly to keep the nursery functioning at the outstanding standard we want to offer.

The hourly rate isn't enough now for any child

Reducing any funding will not support settings. Settings are at a loss!

We feel that this approach would effectively act as a cap on SEND funding and mean that funding would not be appropriate to meet all children's needs. This process would mean you would gain by having all children funded with their NEF hours but you would lose SEND funding. On principle we should we would prefer the LA to lobby for more SEND funding from central government and not make us have to chose.

Question 2 - Do you agree with the principle of reallocating the current EY's SEND spend to target support towards children with complex SEND?

Nurseries should not be expected to cover the shortfall in funding of children who need 1 to 1 support we are struggling as it is

This would be great in theory but not to the detriment of cutting costs else where as this could cause nurseries more financial struggles in other areas.

Yes there are lots more complex children within main stream nurseries that require extra support

The exceptional funding plus funding hourly rate don't cover an hourly wage let alone anything else what goes with a complex needs child.

Again the Government needs to allocate more funding centrally to meet this need

All children should be entitled to the support they need not be deprived of support because their needs are not complex enough

All children with SEND should have access to some additional support, this may not need to be as costly for some but to take away the opportunity to meet the needs of our youngest learners at the first possible opportunity would be counterproductive and not aligned with research/guidance. To also assume that settings can try to meet the need of less complex send without the financial support to upskill staff etc would be unfair. I would agree that more complex send could need access to a large proportion of money but it should not be reallocated completely.

I believe if you reviewed how child qualifies for GR2, 3 and 4, we have had children that qualify for GR4 but we haven't claimed it because their although the children have greater needs it doesn't necessarily warrant the being on the graduated response level. Which could mean that some if this spend could reallocated.

Some of the children with Speech and language we support in small group exercises and no additional funding is required.

Children who don't meet the criteria for complex still need additional support that has financial costs.

See earlier comment.

We have more children who need 1-1 which we just cannot support with the current funding system and staffing issues. Children who need 1-1 should be offered care in specialised settings which are set up for their needs, have staff specifically trained. The current system is failing the SEND children and the other children who are not receiving as much interaction as staff are having to prioritise the SEND children for their own safety and safety of the children.

Targeting the most complex needs will work as I can not cover the costs of employing 1:1 staff under the current levels and I am out of pocket supporting these children and offering the very best service

that I can. Every year for the past 3 years we have supported children with severe needs and gained EHCPs for them. the work involved in these children is vast and more and more work is put on us each year.

More funding in this area would allow settings to employ and pay additional staff accordingly

All children with SEND require some form of additional support and schools need the budget to be able to provide this.

The additional resources needed for complex SEND are the most costly e.g. staffing

As long as other children with SEND needs aren't passed over to do this. Some children who are just under SALT still require lots of extra support in order to support their development and prepare them for school.

All children including those with SEND need to be funded on what their provision costs - no one child is more deserving than any other but all children deserve to have a provision that meets their needs

This is where it is needed the most. Children with complex needs who need an adult to support their needs.

The complex need children need more adult support for longer that costs more

It is also very hard to find the staffing to do this.

All children need the right support for their needs. You can't take away from one group to give to another. As a childminder the children should all be funded equally anyway as we can only have three children at a time. We cannot provide adequate 1:1 support with only one pair of hands and we do not necessarily want to recruit help as we don't want to open the minefield of employment law.

We are unable to effectively meet the needs of the children we currently have on roll whose needs do not meet the criteria for exceptional and challenge funding. To reduce or remove the option of supplying funding for those children will significantly impact on them achieving their potential in the early years provision. We would have to give more consideration before accepting a child and offering the full entitlement of hours.

Currently we have on roll children with complex and significant SEND needs. We struggle to offer places, maintain experienced and impactful staff on the current funding levels. We are expected to monitor development, signpost to referrals, commence EHCP's and provide a bespoke provision for complex and varying needs within a mainstream setting. Current funding levels are inadequate but removing funding from the lower needs children will cause different problems and children will suffer as a consequence. We are an incredibly inclusive setting and offer lots of SEN support and provision as a matter of course but we still struggle to meet need and remain financially viable.

If this does happen this will unfairly disadvantage those with uncomplex send needs.

If this happens, children with uncompleted SEN needs would become compromised.

They should be spilt budgets!!!! All children matter!!!!!!

Children who are not complex but need support still need SEND funding to give interventions, 121 support and practitioners who are trained and knowledgeable, so that these children make progress in order to access mainstream education.

All children deserve support with SEND

Each child should be supported with a level of funding that is required to their individual need.

Funding should be provided for all children regardless of their level of SEND need. No child with SEND should lose out in order to provide for a child with complex SEND. This process would be significantly improved if the LA recognised their Legal responsibility to appropriately fund nursery aged children with EHC plans already in existence.

Question 3 - Would higher levels of EY's Inclusion funding enable you to offer children with complex SEND their full NEF entitlement?

If we got the right amount of funding we could employ staff and increase hours

Spaces within the nursery are limited, and sometimes the environment is just not right to support these children.

If it was high enough I imagine it would. Currently we offer our children all their entitlement because we can and feel it's important that children have equal rights to spaces

With adequate funds then more children's needs can be met - however often a 1:1 is needed and there are rarely enough funds for that.

But only if it is not deducted from the NEF children without SEND

It would be very much child dependent and setting dependent. If the setting had the right spaces/resources and was able to employ/train/find the right people to support the needs of the child then this is a possibility. However money alone would not completely enable this. There needs to be specialist trained people available who are able to work within setting with the children with the most complex need.

yes as some need a reduced ration of staffing so only able to do this if we have the funding

Possibly

This would depend and be on a case by case basis.

It would also depend on the proposed amount of money and whether this comes closer to covering increased staffing and resource costs.

Currently the additional does not equate to the staffing costs of providing additional support for those children with complex needs. Those with SALT who are accessing provision that is ordinarily available with a few short 1:1 sessions to support meeting targets can claim additional money but this is really now our ordinarily available. It would be more beneficial to not have extra money for them for example but to have more for those who require 1:1 support.

It would still be too costly!

whilst higher funding would help I still don't feel that children with complex SEND should be in mainstream settings.

Yes as I could staff the preschool to support the child's needs correctly Its not about making a profit for me its just about covering the costs of the equipment needed and the support of the professional dedicated staff to look after and support the child.

We already to support families to access the full nef entitlement, often at a cost to ourselves as a setting

This would obviously depend on the percentage increase in order to do this successfully.

But this is dependent on being able to recruit staff.

We already offer the full entitlement

there are not enough specialist nursery places to do this

This would need to be the full cost of a TA and not partial which is the case with most EHCPs. The funding never covers the cost of the support, let alone the on costs attached to that.

Yes it would but sometimes depend on the needs of the child and how they are coping in the setting

We already run at a loss for our current SEND children to ensure they get this.

Last year I ran with a child on a 1:1 who attend 5 days a week 8-5 at a loss to meet the child's needs now this child has gone to school and School are only allocating this child 2 hours a day because they can't meet need.

Again I only have one pair of hands

We currently have several children on roll with complex SEND needs. Due to financial restraints, we often have to ensure these children are not in the same sessions and therefore cannot always offer the full NEF entitlement. We have also had to refuse children places as we do not have the funding in place to support them and cannot afford the staffing levels and on costs required to support this. We are a mainstream setting that promotes inclusivity. A reflection of this is that our primary school has 45 children out of 280 who have an EHCP. This is not including children who require SEN support and further assessment.

This would allow us to seek extra staff to provide one to one which our current allowance does not allow.

Higher level would allow extra staff to be employed to enable a one to one care.

YEs, we could pay for a 1:1 or reduced ratio

It would depend on whether additional staffing was available

Depends on the complexity, depends on whether our environment would be right for them, depends on employing the right 121 staff they would need, depends on the dynamics of the cohort, if we had too many complex needs children with 121 adults the classrooms would be overwhelmed with adults.

If the funding enabled setting to have a 1:1 for children's specific needs

We are supporting 4 children with 1:

1 at a cost to our setting each session 9-12, 123 or 9-3, on reflection could we take anymore children in capacity of children and adults, would be my question for the future?

However, depending on the levels of SEND needs and funding provided, the child/ren may still not be able to access their full NEF entitlement hours.

As a provider we do offer all of our children with SEND needs their full entitlement anyway, however to do this we are using more of our school budget as SEND funding does not currently meet needs and, therefore, the wider school is losing out as our finances are constantly stretched.

This would help to offer a lower ratio to support those with SEND

Question 4 - We are proposing to include a small hourly supplement to support 0-4 year old children with emerging and low-level SEND.

Do you agree with this approach?

This would help with supporting the children

This helps provide some extra targeted support for some interventions such as speech, small group work or OT exercises.

I believe this is what currently happens with GR process

No

I would question what 'low-level' SEND would be. I would also question how it is determined that it has passed the threshold to no longer low level.

I feel that this will not solve the problem.

I think most needs at this level can be managed in ordinary provision more help with more complex needs would be more valuable

yes as by being able to put things in to place early which will have a greater impact on children.

This would make far more sense.

I would rather the money is spent on children with complex needs, emerging and low-level SEND should be covered with the normal funding

This will work with low level needs as most children cope well with the day in general and just need some targeted support during the sessions that can be provided by the practitioners working daily.

Far more children attending now need additional support

An increase in NEF funding for SEND would be welcomed, although once again, this needs to be in addition to the GR funding.

To support any children with SEND, requires staffing, whether 1:1 or for interventions etc. Staffing is expensive and so SMALL supplements do not really work.

any additional support would always be helpful though may not solve the issue

Yes but this would also depend on what 'small' supplement looks like... not worth it if it's not going to have an impact. This needs to be fair and in line with the duties required with supporting a SEND child.

But not if it reduces NEF funding rates.

Every bit helps to help us support them

Early support and targeted work will set the foundation.

Well it's better than nothing

This will not be sufficient to adequately support these children. We are skilled in identifying and supporting children with SEND needs. Children receive prompt assessment in their early years classes. However, the financial burden of this is becoming unsustainable. Children with EHCP's in early years are not supported by the E funding. The GR funding does not adequately cover the assessment process and cost for the enhanced provision.

Please give more detail on what SMALL means

Absolutely, to put in quality interventions and support at this level and for a short period of time, would enable children to get targeted support when they need it and progress.

Sometimes this may not be enough, child dependent

I feel any child needing above ordinary needs to be funded extra. DFE needs to realise the impact on each setting daily. Low level is more than just the child, it is conversations (time) with parents, referral writing time etc the list could go on.

I think we need to define what is meant by the term small. Ultimately the amount of funding needs to match the needs of the child.

Question 5 - We are proposing to simplify the current EY's Inclusion Supplement model and application process, replacing GR2, GR3, GR4, GR4 + Challenge and Exceptional rates with 4 levels of funding with clear criteria for each.

It can get very confusing with all the different rates and seeing where the children fit.

Anything that makes it simpler is good :)

Simplification is always good - as long as the low level needs are not excluded completely.

It is difficult to comment on the question below (Q12) without knowing what the other levels are being proposed as

If this goes off the new tracking which shows children at a higher level than they were on previous tracking then no. It's a total cost cutting cover up!

I think this would work as long as the criteria was very clear.

As long as the criteria are so rigid or specific to the detriment of the children that are currently eligible under the current GR system.

I believe clearly defined criteria will help settings to identify and claim appropriate levels of funding for their children.

A standardised more simple approach would make far more sense. This though needs to be the same approach nationally!

anything to make it easier to claim would be great

yes clear and concise funding levels will help massively. Currently when supported by the area senco i am told i do not claim high enough sometimes.

Clearer criteria would be welcomed.

Overly complicated and subjective current rates

I think the current system is already clear and works well. I don't see why changed the names of the levels would make any difference.

Provided that the bandings are truly reflective of the costs of provision for those children with the most complex needs

This must not be any less than what this transfers to in monetary value e.g. will the GR4 + be the same as a level 4?

May be as we understand this criteria

I am ok with the way it is but I do know some settings who struggle with this.

In principle but why change the wording that we are all used to?

On the basis that the money awarded at each level truly reflects need and required provision and enables settings to properly support the children.

Look at Solihull's approach, it is much simpler and more streamlined

Think this is a great idea!

Although I am just getting my head around it, it is complicated and a simpler approach would be better

I am sure the new levels will match current GR's

As long as the criteria work for all SEND children especially those entering Worcestershire from other areas as we find that our intake is made up of children from Solihull, Warwickshire, Bham and some who have not attended a placement. Currently these can miss out. Funding needs to match the financial outlay that the school is making to provide for that child's needs.

Question 6 - The proposed criteria for Level 1 are as follows:

The child:

- Is known to the Early Years Inclusion Process
- Requires additional resources to ensure SEND needs are met, as recommended by at least 1 external professional eg. SALT
- Does not have an EHCP in place

Children eligible for Level 1 EY's SEND funding would have similar needs to children currently receiving the EY's Inclusion Supplement at GR4.

If this is the starting level then I think there should be a level of knowledge already in place in the nursery - that can be sustained - so is there to be a degree of consistent training provided at no cost to providers in order to ensure staff are able to manage low level needs as they may be receiving less funding for the low level needs - which they may currently spend on training for those needs. As SEND isn't something that is generally taught effectively pre-qualification

A small top up. An informed decision can not be made without figures how can we be sure a small top up will cover one to one including the over heads for employing the one to one and the additional resources those children need!

I would question what support is available for children who are needing extra support but have not yet had access to an external professional support. There are a lot of children in my setting where we need to make the referrals and put in place lots of support from our knowledge and experience while the family are waiting. At times this includes children with significant SEND needs.

Excludes children with low level needs

Reflecting on children in our setting who this may apply to, for example, if they have SLCN and are known to SALT, we would not necessarily make an EYIN. The main reason for this is that as a school based nursery the majority of referrals result in coming back to school based support, I understand because we have qualified teachers and SENDCo. Therefore in order to secure this funding, it is going

to create a higher workload for the SENDCo and possibly a higher number of cases for the EYIT to process and support. Would the outcome of school based support continue to be the same?

This would be 70% of our cohort as so many of them have SALT referrals, this should be part of the normal NEF as it is what we do day to day anyway. As I have already said the money needs to go towards supporting those children with significant extra needs.

Current GR4 levels are a high level of need as a comparison

A level one criteria does not reflect the needs of an equivalent child receiving GR4.

Knowing the high number of children with needs we have already we can not see the support, it feels like its being taken away

Children with lower need would miss out on any additional support we could give them and current funding levels are already inadequate. No additional would be supported. You would need to ensure the base NEF level was significantly increased.

Level 1 should be lower threshold, all children matter!!!!!!!

The criteria is too high

Most of our complex children are identified at their 2 year check and are awaiting appointments to be seen by outside agencies

There needs to be a level before this.

As an outstanding nursery, we dont wait for children to be seen by a professional before we start giving them interventions and 121 support. To see most professionals the waiting lists are so long and lengthy it could be between 24 weeks and a year before they get seen! so does this mean we will not receive any money for them?

The criteria are high, especially for a child not long attended the setting but needs additional support when no outside professionals are yet involved

We disagree because this would mean less funding for us as a setting with a high level of children within the GR2/3 current banding.

As stated above children unknown to the Early Years Inclusion Team are often children coming from another area or from a setting where their needs have not already been flagged. We need the system to be equitable, as at this current time these children miss out on funding. We cannot claim higher levels of funding until we have registered them with the Worcester Teams even though they have, in some cases, got an existing SEND profile and involvement with agencies from other authorities.

Question 7 - The proposed criteria for Level 2 are as follows:

The child:

- Is known to the Early Years Inclusion Process Has significant SEND needs as demonstrated by the EYFS profile and graduated approach evidence
- May/may not have an EHCP in place
- Has ongoing support from at least 2 external agencies
- Funding request is supported by a member of ISS
- Will have a moderate level of need relating to vision loss/deafness, as determined by the Sensory Impairment Team
- Provider must be registered as good or outstanding with Ofsted

Children eligible for Level 2 EY's SEND funding would have similar needs to children currently receiving the EY's Inclusion Supplement at Exceptional.

As above

Same comment as before. How does a setting get support for a child with this level of need if they have not been identified?

It can be challenging to get external agencies involved. Sometimes only SALT even with high needs.

Some children have significant need but do not vision loss or deafness

Excludes children with low level needs

With current wait times for services, the child may not have 2 agencies actively involved with the child. Also, as above, as some of the children come back to school based support, we may not necessarily receive the second agency support that other providers do. It also states 'Will have a moderate level of need relating to vision loss/deafness, as determined by the Sensory Impairment Team'. I am unsure if this is if they are involved or a must for all children claiming this level, in which case that would really reduce the number of children able to claim this level. The term 'significant SEND needs' may need clarifying as one setting's definition of 'significant' and another's may vary.

The Ofsted criteria. If a parent chooses to send their child to that setting which may not have a good Ofsted that should not then mean the setting cannot get funding due to the parental choice. This could lead to settings turning families away and parents wishes not being met as per the CofP

to much gap from 1-2

See notes above

As above

Unclear whether all criteria need to be met, especially sensory.

ofsted rating should not impact the amount of funding a child receives

Why is that only Level 2? The pay for this must be higher.

Big jump from Level 1 to Level 2

Where is the 1:1 support, the children do not get to see a second external agency due to your waiting lists and NHS waiting times which means we would not get the extra money to support them when they are with us.

It is extremely difficult to get more than one external professional to support children with significant need. Waiting lists are in excess of 2 years.

As ABOVE

As for level 1

I disagree that criteria for an individual's funding should include a settings ofsted grading. There is also a lot of criteria for level 2 which could result in children displaying challenging behaviour as an result of SEND are left only being able to claim level 1 funding.

This I feel would be your Level 1 criteria

Criteria for level 3

If the child has to have all of those criteria met, this is unreasonable due the availability, referral wait times and cost of external agencies (other than SALT). Also if the school's Ofsted changes, the school if anything would be in need of funding even more so, not reduced.

It is completely inappropriate for money to only be given to SEND children who are in a good or outstanding school or Nursery. This system penalises children. Also, as we know Ofsted inspections are subjective. Can you also clarify whether the Ofsted requirement would also exist for children trying to claim levels 3 and 4 funding as our objections would remain valid for all levels.

I don't believe the setting should be registered as good or outstanding as this narrows the choice parents have for their child. The setting itself does not impact the child, the support and funding the setting has access to does.

Question 8 - The proposed criteria for Level 3 are as follows:

The child:

- Is known to the Early Years Inclusion Process.
- Has significant and complex life-long SEND needs, identified by the Sensory Impairment Service or Physical Disability Outreach Team. Profound level of loss means they will require BSL or Braille to access learning and in the case of VI, require 1:1 support to ensure safety in the setting as well as access to learning.
- May/may not have an EHCP in place, although assessment is likely to have been requested.
- Requires a high level of adult support whilst attending an EY's setting
- Support staff require additional training and/or qualifications, which are not typically required to support a child with SEND

Do you agree with the proposed criteria for Level 3?

As above

The wording is appropriate but again I would question support prior to getting the support.

Significant and complex does not necessarily mean sensory or physical teams involved.

Braille or BSL are not the only significant needs a child may have!

Excludes children with low level needs

Again, with reference to - 'Has significant and complex life-long SEND needs, identified by the Sensory Impairment Service or Physical Disability Outreach Team. Profound level of loss means they will require BSL or Braille to access learning and in the case of VI, require 1:1 support to ensure safety in the setting as well as access to learning' This would significantly reduce the number of children able to access this level. It does not state how many agencies need to be involved with the child.

Too much gap between levels

Funding must be increased to pay for the additional staff and training provided

As above

The need for PD outreach or SIS input

Specialist school staff eg in assessment nurseries should also be able to identify needs, not just SI service or PD outreach

1:1 support may also be needed to monitor complex medical needs not just sensory needs

Looks like all our children are on Level 1 no matter what the need unless severely disabled but we have a varied range of needs

See above answer.

AS ABOVE

As for level 1

Would this child receive less funding than they would currently accessing GR4 + challenge? Currently, we have children at our setting receiving 1:1 support all the hours they attend, which is still below their NEF entitlement due to staffing and funding limitations, and they would fall under Level 3.

this I feel would be your level 2 criteria

Criteria for level 4

Does the child have to meet all of the above criteria? Some children have significant communication and interaction needs, which require a high level of support, but is not necessarily known to an impairment service or PD outreach team. This still requires a high level of support throughout the day.

The criteria here is not agreeable to us as again there is a stipulation that the child has to be already known to the Early Years Inclusion Team which would exclude all children newly entering the authority or who have not previously been in a Worcestershire Early Years setting. Additionally, there seems to be a massive slant towards providing for the needs of children with physical disabilities as there is a

requirement that the child is known to a service such as VI or physical disability outreach only. What happens for children with a neurodevelopmental disability?

In order for a setting to provide a high level of support the funding will have to be sufficient enough to pay for an additional staff member to offer lower ratios.

Question 9 - The proposed criteria for Level 4 are as follows:

The child:

- Is known to the Early Years Inclusion Process
- Significant and complex life-long SEND needs, identified by the Sensory Impairment Service or Physical Disability Outreach Service.
- 2:1 support required to meet health and education needs whilst attending an EY's setting.
- May/may not have an EHCP in place, however an EHCP would be expected to be in place prior to starting statutory education.
- Known to Continuing Healthcare Team
- Known to Disabled Children's Social Care Team.
- Support staff require additional training and/or qualifications, which are not typically required to support a child with SEND56 responses with 18 No with 38 Yes

Do you agree with the proposed criteria for Level 4?

As above

Who is an EHCP expected by? Some parents would expect an EHCP for a much lower level of need, does this need clarifying.

Significant and complex does not necessarily mean sensory or physical teams involved.

Funding is so poor that we cannot meet 1:1 needs let alone be able to sort 2:1 funding

Excludes children with low level needs

gap between levels

See notes above.

As above

As above - specialist school staff should be able to identify need.

If all of those criteria had to be met then it would not be fair to pupils eg some families with highly complex children with really significant medical/health needs manage all of those needs without social care support. Other children have highly complex medical needs without requiring support from CCN team due to the nature of their condition/the type of support required

Additionally, young children may not need 2:1 support at all times but may need a whole class team to meet their medical/physical needs for part of the day

As above

All children at our setting that we have identified as having additional needs have an EHCP before they start school. We would welcome further discussion as we pride ourselves on our inclusion and would ultimately want to find a workable and practical solution to this issue.

AS ABOVE!!

As for level 1

this would be level 3 criteria

Needs to be put into a higher criteria group

This reads as specialist provision- not something mainstream can access this level of funding for, even though there are limited spaces within specialist provision. How do we then support financially if there is no other setting for the child to go to?

We fundamentally do not agree with all of these criteria as they are laid out here. Whilst some criteria are valid the proposals do not take into account the fact that some of the children with the most complex needs are stuck on excessively long NHS waiting lists waiting for their conditions to be diagnosed i.e. Pre-school umbrella pathway, additionally there cannot be a stipulation that Complex Needs SEND children have to be known to the Children With Disabilities Team when it is so difficult to get children to be registered and seen by this team. We have experience of trying to involve the Children with Disabilities Team with two ex pupils who now attend a specialist setting and the process took over two years and did not result in a successful referral despite all of our efforts and support from other external agencies. For these criteria to work all agencies should be working efficiently and in conjunction with one another and sadly this is not the case currently.

For this level to be acceptable the LA would also need to be prepared to fund staff training for the purposes of providing for the SEND needs for individual children. This is something that we have found it extremely difficult to get them to do, even when the child has an EHC plan in place which stipulates that this is needed.

As above, the level 4 has to provide sufficient funds for a nursery to staff an offer of 2:1 support.

Any other comments provided

Sounds positive

Moving money from one pot to another is not going to solve the issue that is at crisis point. Settings are not stable and this is going to make the situation no better.

Schools or Nursery/ Pre-school settings should not be required to use aggregated funding from other pupils to make up shortfall in order to accommodate pupils with SEND. There should be additional resource that fully funds additional support, or specialist provision that is also fully funded, regardless of the criteria banding.

I believe that this is confusing to the way Graduated response is already set out. However introducing levels such as GR4 -low level need, GR4 -medium level need and GR4 -high level need etc. could possibly be less confusing and more fitting, resulting in funding being allocated more effectively as per my answer in question 5.

Reflecting on children we currently have and have had in the past who required very high levels of support, ended up with an EHCP and some attended specialist nursery places or went on to specialist school placements, they would only fit into level one of the proposed levels above. As I'm unaware of the monetary value attached to each level, it is difficult to say whether it is reflective of the support needed. What level would a child with an EHCP fall into?

The SEN model definitely needs looking at and changed. Being able to support these children with highly qualified staff and being able to pay for this will take the pressure off small businesses like myself. I am not about making profits I just want to be able to support the children and offer the very best that the setting can to enable the best possible outcomes for the children in my care. The past years have been difficult in affording these experienced staff and all the additional equipment needed to support the children. The DAF helps massively with this and I am appreciative of that payment.

Whilst we acknowledge the increase in demand for SEN support for families the funding has to be increased considerably to enable settings to provide additional staff and train them accordingly.

The new proposed criteria appears to be aimed at children with the most complex needs and schools will be left to support children with other additional needs without sufficient funding.

I do strongly believe that the current system works well. Our nursery is well supported by the current SEND funding and able to offer everything needed including additional staffing. I would be concerned to lose the GR2 level of funding as a lot of children under SALT really need extra resources or staff training to support these speech and attention needs.

It would be helpful to see what the proposed funding for each band is - we could then compare this to what it actually costs to meet the needs of complex SEND children in reality. As a school, we are increasingly reluctant to offer nursery places because it costs far more than any income gained from doing so

The system must be simplified and more clarity needs to be given to settings so that they have a clear knowledge of what is needed.

Depending on the levels of funding ie money we don't know if we will be worse or better, off which will have an impact on the care of our children as to getting extra staff to support!! we already supplement extra staff needed as there is hardly any money to provide this currently, but its needed. Vale outreach support was always vital resource for settings.

I wouldn't be able to support a child needing 2:1 support!

We would welcome further discussion as we pride ourselves on our inclusion and would ultimately want to find a workable and practical solution to this issue.

Completely ridiculous, show us you care please!!!!!!!!!!

No other comment

This proposal would make funding for SEND in my setting almost impossible to secure

I agree with the criteria for Level 4 as a child with complex SEND requires targeted support and funding to support them. We haven't had a child attend our setting with this level of SEN.

i am worried about the children at the low level of support, the children who have separation issues, behaviour challenges, mild speech & language, not seen any professionals yet but require more than what we would give, making adaptations to our ratios, classroom etc.

Inclusion funding needs to reflect the time, constant support and energy given to all children and families. Most funding is taken to support 1:1 to reduce incidents, this does not take into consideration time to write IPM'S, support plans, EHCP'S (which is hours and days of times). At this time I feel careful consideration should be taken to evaluate the send increase in children and the time and impact to the practitioners who make a difference everyday to our children. Settings should be able to reflect this in ay by increased funding.

The banding makes sense if it is a 'best fit' and does not require all of the criteria if further evidence can be given e.g. awaiting umbrella pathway for example as an external agency. The funding, we presume will look less in general with the new banding, as suggested in Level 1's comments. This would make additional support very difficult to provide when trying to staff children with significant needs.

Working within the Birmingham City Council Borough I can see this is leaning towards that model of SEND funding. However, what happens is a race to the top for those settings that know how access the funds required and leaves families with very restricted choice. You will find settings will refuse a child access without an EHCP as they are unable to access the funds required to support without it.