



ASSOCIATION
OF COLLEGES

High needs and AP funding call for evidence

Association of Colleges response

4 July 2019

High needs call for evidence

Funding for pupils who need alternative provision (AP) or are at risk of exclusion from school

Question 17. How could we encourage more collaboration between local authorities, schools and providers to plan and fund local AP and early intervention support?

General Further Education Colleges run substantial volumes of alternative provision (AP) in collaboration with their local schools. This includes part time and full-time provision based around technical/vocational skills. Students are referred by individual schools, pupil referral units or the local authority. Referrals can come via local authorities run area wide inclusion panels made up of schools and in some cases colleges as AP providers.

Colleges used to run more alternative provision in partnership with schools. In the early 2000s they started running funded Increased Flexibility/Young Apprenticeship Provision a one day a week, throughout KS4, introductory courses at Level 1 or 2 with a qualification attached. These courses provided students with practical skills and knowledge which meant they could progress to Level 2 or 3 courses post 16. Students on these courses were often referred because mainstream school curriculum offer did not fully meet their needs. Students blossomed and flourished on these courses, enjoying the opportunity to excel in a skills-based environment.

Currently provision is much more focused on students who are in danger of exclusion, permanently excluded or electively home educated. Some colleges run direct entry provision where students are enrolled and funded through the college. A small number of colleges also run ESOL provision for newly arrived young people, enabling them to improve their language skills before embarking on a post 16 course. Funding models vary from area to area.

Young people benefit from earlier intervention, such as increased flexibility programmes as they experience success and recognition. Those young people who are at risk of disengagement can be identified through RONI (Risk of NEET indicators).

Area inclusion/exclusion/behaviour panels can and do bring together local authorities, schools and AP providers, but a more strategic interventionist approach is required. Currently panels are funded to be reactive rather than taking proactive, early intervention approaches.

Question 18. What changes could be made to improve the way that the AP budget is spent, to better enable local authorities, schools and providers to use the local AP budget to provide high quality AP, intervene early to support children at risk of exclusion from school, or reintegrate pupils in AP back into mainstream where appropriate?

A panel made up of local school and college AP providers could provide a more joined up preventative, strategic approach to address the needs of individual students before they face exclusion.

Further Education College can often be a very positive way for these young people to re-integrate into education, either between 14-16 (see answer above) or at 16. AoC believes that placements for these young people post 16 should be in a GFE and does not endorse any suggestion of establishing post school AP. However, funding for these young people in college, especially if they do not attract High Needs Funding, can be very problematic.

Decisions about alternative provision rest with councils and, in many parts of the country, there is a big divide between provision before and after the age of 16. Pre-16 funding levels are sometimes two or three times the level of post 16 funding, resulting in large differences in class sizes for young people (eg pre-16 classes of 8 compared to 18 post-16). These differences, combined with inconsistent monitoring and support for young people at 16 contributes to the situation in which tens of thousands of young people drop out of education and don't take up apprenticeships or enter work.

Question 19. Please use the box below to share any examples of existing good practice where local authorities, schools and AP settings have worked together effectively to use the AP budget to provide high quality AP, intervene early to support children at risk of exclusion from school, or reintegrate pupils in AP back into mainstream where appropriate.

College based full-time direct entry Key Stage 4 Provision provides a good example of how early intervention can help support re-engagement with education and progression through a mix of technical vocational and core curriculum subjects. This model provides an excellent resource in the areas where it exists, but college uptake has been limited due to the funding arrangements which mean that a full time (25 hour a week placement) is based on 16 to 18 study programme funding of £4,000 per year. This is a lower rate than mainstream school provision. Yet attendance, engagement and progression post 16 indicate how successful this model can be.

Examples of good practice for those who have been in AP and move on to college are given in response to Question 24, but these students do not attract AP funding.

Funding for students with SEN in further education

Question 20. Are there aspects of the operation of the funding system that prevent young people from accessing the support they need to prepare them for adult life?

There are almost 20,000 young people with high needs in colleges and the number of referrals is rising considerably year by year. They face several challenges in accessing the support they need:

- **Insufficient funding:** DfE funding for high needs has risen in cash terms in recent years but increases have not kept pace with total costs. Costs have risen because of rising numbers of students requiring support, inflation, education-specific cost increases (for example pension contribution increases) and higher expectations.
- **Local authority prioritisation of younger pupils** DfE allocates a single high needs block to local authorities within the Dedicated Schools Grant. Local authorities tend to prioritise spending on young people of school age because this is a fixed commitment that is hard (though not impossible) to vary until the age of 16. In addition to this decision about HNF are taken by Schools Forums and although colleges are represented on these there are far fewer colleges than schools hence college members can easily be outvoted.
- **Retention of pupils in schools in early adulthood:** Some special Schools are creating 'trusts' to add on a post 19 unit to their school. The result is that some young people will stay in the same school since they were aged two. This may not be the most appropriate route into adult life.
- **Limited college budgets:** College funding is under pressure in all areas. As a result there is limited room for colleges to cross-subsidise provision for those with high needs.
- **Level of Funding:** Increasingly AoC is being given examples of Local Authorities assessing SEND students at a cost of just under the Element 3 threshold of £6000, even if they received High Needs Funding when at school. This includes many students who have an EHC plan. This means that colleges have to support these students out of their College Disadvantage Fund leaving very little money for the much larger group of students who may have considerable SEND needs but do not have an EHC plan
- **Post 19:** Local Authorities vary considerably in the extent to which they are willing to support young people with High Needs over the age of 19 with some beginning to say that any provision post 19 must be the

responsibility of Social Care. This ignores the fact that many special schools keep young people at school until they are 19 and also guidance in the SEND Code of Practice which states that there will be young people who because of their SEND will take longer to complete their education.

Question 21. Notwithstanding your views about the sufficiency of funding, please describe any other aspects of the financial and funding arrangements that you think could be amended to improve the delivery of provision for young people with SEN.

The devolution of the high needs budget to local authorities in 2013 resulted in more detailed management of spending but with the consequence that more money is spent on administration and contract negotiation. The typical college has more than 80 students with high needs (some have as many as 500) and has to negotiate programmes and costs with at least 5 councils (sometimes as many as 14). Variation between assessments, costs and amount spent on high needs students varies very considerably between Local Authorities creating a post code lottery for young people.

Each Council tends to use different processes and paper work hence greatly adding to the workload of college staff and DfE encouragement to councils to use standardised processes hasn't made any difference. Greater standardisation would make a large difference to colleges.

Despite DfE guidelines colleges often experience delay in Councils making decisions about funding with the consequence that they can accept students expecting funding to follow then be told that it will not. One college recently told us that he had to cover an additional £1 million HNF because of a doubling of a number of referrals out of a college budget of only £18 million.

Colleges are very clear that one of the biggest impediments is being unable to ensure security of High Needs Funding funding from year to year along with the proviso that this is increased if numbers increase, and would strongly endorse some system of lagged funding. The recent flexibility in the rules to allow councils to agree block funding for colleges on a longer-term basis than one year is helpful and AoC welcomes this and tries to make all colleges aware of it, but, so far as we know, it is only being used by colleges in Kent. Some colleges have told us that it proves difficult to implement if a college deals with several different Local Authorities. We also have examples of colleges which want to implement this way of working but their Local Authority has not agreed to it.

DfE has helpfully made capital funding available for facilities SEN students. This will help some councils and colleges to work together to improve quality and to reduce the use of more expensive residential provision. However there has been little transparency over how money has been allocated to local authorities. There might be value in a national specialist fund which colleges can bid into.

Question 22. If you are able to provide any examples where local authorities and colleges have worked together effectively to plan provision to meet the needs for SEN support and high needs, please describe these below.

This method of working can be difficult for the many colleges who work with several Local Authorities. It also can only happen if both college and Local Authorities agree to working in this way and we have had examples where the college wants to but the Local Authority will not agree.

However:

- The East Kent Group of Colleges have come to an agreement with Kent Local Authority to work together and set a fixed sum to be continued for two years and this has reduced bureaucracy for the college and allowed them to plan ahead more effectively.
- Colleges in the Black Country have worked together with their Local Authorities bringing together college principals and Chief Executives of their respective Local Authorities. They have said that the effectiveness of this approach relies on making sure that it is lead from the top with college principals meeting regularly with Chief Executives of Local Authorities.
- Oaklands College in Hertfordshire has very good links with Hertfordshire Local Authority. The Authority recognises the value of college provision and ensures that external support such as Speech and Language Support is equally shared between college and schools. This is based to a large extent on longstanding historical relationships between social care and education.

One issue which has been arising recently is that some Local Authorities are insisting on auditing their high needs provision in colleges and also monitoring it for quality. Colleges feel that this provision is already audited by ESFA and monitored via Ofsted and that this additional monitoring is wasteful of time and resources both of the Local Authority and the college. AoC would welcome some guidance on this.

Improving early intervention at each age and stage to prepare young people for adulthood sooner

Question 23. Are the current funding or financial arrangements making early intervention and prevention more difficult to deliver, causing costs to escalate?

Effective transition from school to college is essential and often reduces the resources required when a young person is in college. However funding constraints result in support during transition being very variable. Link courses between special school and college can be an excellent means of ensuring better transition but these are not

available in all areas. AoC is concerned that Preparation for Adulthood must start in school at least in Year Nine but this doesn't always happen meaning that young people can come to college very unprepared for their next stage.

One positive introduction in the SEND Reforms was that there should be joint support from education, health and social care. However funding restrictions mean that often health and social care assume that students with an EHC plan in college should be solely funded by education. This not only puts a greater burden on education but also means that a smooth transition to support when a student leaves college does not occur.

In terms of transition from mainstream schools or from Alternative Provision for young people who have challenging behaviour, mental health difficulties or for those who have been off rolled or non attending, college provision can offer a safe, regulated alternative. However, funding is insufficient for this to be provided in all cases.

Colleges admit students from a very high number of mainstream schools and it is often impossible for them to deal directly with all these schools on an individual students basis. Often essential information about students who do not have an EHC plan but may have complex needs is not passed on sometimes because schools feel it is important for them to have a fresh start. This can result in valuable time being lost with colleges having to re-assess what a particular student's needs are and the best support for them. It would be very beneficial if there were nationally agreed protocols for the passing on, with the student's permission, of relevant information on their support needs.

Question 24. If you can you provide examples of invest-to-save approaches with evidence that they can provide value for money by reducing the costs of SEN support, SEN provision or other support costs (e.g. health or social care) later, please describe these below.

- Several colleges do have very good relationships with feeder special schools and provide link provision whereby students in their final year at school can attend college one day a week. This greatly enhances their transition and leads to better outcomes at college.
- Somerset Colleges have initiated an approach with their school which means that every young person in the county who will be transferring to college at 16 with SEND/behavioural issues is discussed and appropriately placed to best meet needs.
- East Coast College has instigated a short programme in the summer before students start college for vulnerable young people with mental health needs. This has greatly improved retention of these young people when at college.

- Bridgewater and Taunton College has targeted provision for students transferring from PRUs in the form of an introduction to FE. Learners attend the Crookers Centre, which is a specialist setting for learners with social, emotional and mental health needs, usually for one year, as a transitional arrangement to help them progress onto a mainstream course. Transition onto this course is carefully planned with PRUs with learners attending link courses for one or two days in Year 11. This provision is very effective but the college has difficulties in that the students are not able to attend college for three years (one at the Crookers Centre and two on a regular learning programme) because of reduced funding post 18 for those who do not have EHC plans.
- At Leeds City College learners with no GCSEs or working primarily at Entry Level can attend The Foundry where they undertake an intensive 12 week Princes Trust course. This is a rolling course but whenever the student's starting point the college extends the course to the end of the summer term. Some will go on to a mainstream college course while others move on to an Event, Enterprise and Employability course on one of the main college campuses targeted at learners able to work at Level 2 but unsure of the vocational area they wish to pursue.

In relation to transition from college:

- The supported internship programme is a welcome innovation and many colleges are making use of this. Concerns are however expressed that it is not always easy to access Access to Work Funding to employ Job Coaches. There is also some anxiety that, particularly with the increase of the need for work placements with the introduction of T Levels, it will not always be easy for colleges to find sufficient employers ready to take on learners on a Supported Internship. One constant plea is that some model similar to the Supported Internship should be available for young people with SEND but without an EHC plan. These are young people who are not able to move on to an Apprenticeship and who, if they do not gain employment after college, are particularly vulnerable.
- The shortage of apprenticeship places for young people at lower skills levels has made the transition out of college into work has become slightly more difficult. Some colleges have set up their own Traineeships which have proved a welcome bridge into Apprenticeships for some learners. AoC welcomes the Maynard recommendations but is concerned that the flexibilities for English and maths means that young people who have considerable difficulties with English and maths but do not have an EHC plan can still be denied an Apprenticeship place.
- Weston College has its own residential centre particularly for young people with autism moving on from college. Sometimes these are those with high functioning autism who have a place at university but who need support with the social and emotional difficulties of moving away from home and living independently. Some

are young people who will be moving on to independent living. The Centre is staffed by a young staff group who are trained in autism support. Students will spend a period of time living in the centre, self-catering and going out together.

Question 25. If you think there are particular transition points at which it would be more effective to access resources, please indicate below those you believe would be most effective to focus on.

Funding of schools and colleges is linked directly to the number of students enrolled and retained. Up to now, there have few rewards for helping students to progress, though changes to the way DfE and Ofsted assesses performance may change this.

Given these facts, there are no particular incentives for schools to encourage students to move at age 16.

Examples given above show that it would be extremely effective to focus both on transfer from school to college and also from college to employment or independent living. The examples we have given have proved extremely effective but they have to be funded either by a Local Authority which has high levels of HNF for colleges or, for the many young people who do not receive HNF, out of colleges own resources. There is no universal dedicated commitment to programmes such as these which can make such a difference to the lives of young people with SEND.

Question 26. Please describe as briefly as possible below changes that you think could be made to the funding system nationally and/or locally that would foster more effective collaborative approaches and partnership arrangements.

Facilitation of regional partnerships between different Local Authorities and colleges within a particular local area.

Standardisation of procedures and paperwork between Local Authorities in relation to HNF.

Protocols for transfer of information between schools and colleges for students with SEND but without EHC plans.

Recognition of needs of young people who have been in AP/off-rolled, out of school etc. when they become 16 and more parity between pre-16 financial support and post-16.

Universal system of lagged funding of HNF so that colleges (many of whom have more High Needs students than are in a special school) can have some security and be able to plan ahead.

About this response

The Association of Colleges (AoC) represents nearly 95% of the 288 colleges in England incorporated under the Further and Higher Education Act 1992.

Colleges are drivers of social mobility, economic growth and community development. They provide high-quality technical and professional education and training for 3 million young people and adults and thousands of employers. In doing this, they support people into careers as well as strengthen the economy. Colleges are inspirational places to learn because education and training is delivered by expert teaching staff in purpose-built facilities.

Colleges offer first rate academic and technical teaching, particularly at advanced level, and cover a broad range of disciplines including science, engineering, IT, construction, hospitality and the creative arts.

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