

## Appendix Four: Summary of Top Ups and Bandings consultation feedback and responses

<b>Question 5: Is there anything missing from the banding descriptors?</b>				
Comment	Covered in Bandings document	If Yes, Section	Action required	Response
Acknowledgement of funding differences in special schools (e.g. missing the MSAG) that mean the viability of these bands is not actually comparable.	No	Not applicable	None	The Bandings descriptors are not funding documents. Any allocation of funding will be in accordance with national funding formulas
Although, a briefing meeting has been arranged for the end of November, governors have largely been ignored. We should have been involved at the beginning of the process! It is therefore very difficult to complete this questionnaire which is not accessible particularly as I am neurodivergent.	No	Not applicable	None	Feedback noted, there has been governor involvement in the consultation process with a separate consultation session for governors held on 28 <sup>th</sup> November for 2 hours at George Meehan House.
Behaviour descriptors; clear descriptors relating to severity of difficulties; a list to refer to when referring to several or many difficulties	Yes	Throughout document	Review of descriptors.	The descriptors were reviewed for each section and signed off by the lead teacher for each area.
Children that are diagnosed with very complex needs must receive all the support that they need	No	Not applicable	None	Thank you, this has been noted.
Clearer descriptors as how to distinguish between what is considered mainstream appropriate need and specialist need.	No	Not applicable	None	The Bandings descriptors are intended to be indicators of need not of provision. The testing of Bandings suggested that there were a number of children with complex needs who were being educated in mainstream school as this was parental preference and the resourcing needs to be available to support these children.
<p>Early Years bandings are 1-4 numerical and primary banding are a-H alphabetical. How do they dovetail and how do children move from EY to primary?</p> <p>There is no indication of money or hours attached to the EY band descriptors.</p> <p>There are no reference to early support places in the band descriptors. It is unclear if any of these banding whether children are eligible for specialist provision.</p> <p>Unclear which provision children which will be able to access, mainstream or specialist provision.</p> <p>The EY bandings apply to children in 15-hour places or full day care in nurseries, childminders in homes and reception places in primary school the bandings take no account of the demands of these provisions and environments.</p> <p>There is no consistency and progression between EY and Primary banding, and this will only cause difficulties at transition points in children learning journeys.</p>	No	See Response	None	<p>The Bandings descriptors are intended to be indicators of need and are differentiated between Early Years needs and the needs of older, school age children as there are different child development milestones used to indicate children's needs.</p> <p>The Bandings are indicated by different letters/ numbers to ensure this differentiation is maintained and there is no overlap. It is recognised that children's needs may look different dependent on provision made in early years (for example a child with SEND may present with less complexity of need in a smaller group child minder setting than in a busy day nursery), each child will need to be assessed carefully based on current needs).</p> <p>The consultation was to ensure that the language used to describe children's needs is fair and well-formulated as these will form the basis of funding allocations, however children's needs should not be defined by their provision requirements but rather by a clear, concise and objective description of the area of need for which provision should be made. It is recognised in law that the decision as to where a child is suitably placed is informed by parental choice; therefore Bandings need to ensure that resource is equitably distributed according to the complexity of the needs of the child not by the provision which the child attends.</p>
<p>Early years bandings are numerical and primary banding are alphabetical with no information on how the bandings dove tail.</p> <p>There is no indication of funding or hours attached to the early years banding descriptors.</p> <p>There is no reference to early support places on the early years banding descriptors.</p> <p>It is unclear which kind of provision children are going to be able to access e.g. specialist provision, highly supportive mainstream provision, etc.</p> <p>Early years banding apply to children in 15 hours nursery provision and reception. It takes no account of the different demands of those environments.</p> <p>We are concerns that the two banding descriptors will not support transition between EY and Year 1.</p> <p>There is no consistency and progression between the two documents.</p>	No	See response	None	As above (repetition)
Greater clarity/articulation of what the real difference is between Bands D, E and F (particularly D and E)	Yes	Bandings D, E, F – Cognition and Learning.	completed	Thank you, this has been noted and amended. Please see amended wording to Cognition and Learning bandings D, E and F

I could not find any band descriptors. Where are they	No	None	No	The descriptors are on our local offer website with the consultation documents.
I think case studies of children with these new banding descriptions would help parent/careers and professionals place children in a more consistent way and help moderate the system with very little cost.  Be mindful of language. One person's "severe" is not always the same as another individual's due to their lived experience do examples would be good here too.	No	N/A	Yes	The descriptors do provide definitions with evidence of mild/ moderate/ severe needs across a continuum. However, the observation about case studies is useful and will be incorporated into the operational guidance which will accompany the bandings.
I think that examples of behaviours/ traits that would fit into each of the bandings would be helpful. Maybe case studies of students with their banding profile to help parents/carers/professionals' ability to moderate across the scales. One person's "severe" is not always the same as someone else's perception of it due to their lived experiences.  I'd also like there to be a failsafe/trigger alert type of reconsideration/closer look when the parental/carers description of need is so much more than the schools and vice versa. Especially regarding attendance/social difficulties and behaviour outside of school. The "well they are fine in school" mantra has devastating implications for children and young people and can have a massive impact on getting children the support they need as soon as they need it. This in turn invariably means the support when it arrives is so much more complex/expensive than if the issues had been addressed with reasonable adjustments/knowledge and sometimes common sense earlier.  For example after lockdown my child had attendance/anxiety issues. We had the whole "they are fine when they are here" spiel for a year then after the year the first thing CAMHS asked the school was why haven't you applied for an EHCP for this child- they have the need. If the school were solely relied on I'm afraid many more children like mine will fall through the gaps. No one is working with children to do a bad job but a closer look at the correlation's between parent/carers and educational need descriptions would flag up the potential for early help needed asap rather than when the child falls into complete crisis like my own.	Yes	See page 1 of document	Yes	It is noted that the documentation is lengthy would be supported by Case Studies which will be included in the operational guidance. Page one now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I think the descriptors are not nuanced enough. They do not include those children who mask within school but will still require support in order for them to truly cope and remain in school. It doesn't appear to address those children with significant sensory needs where the busy classroom is over stimulating or they are impacted on by smell, visuals, noise etc . It does not take into account those chosen who Struggle to sit still, focus and require support to stay on task or need differentiated work to cope even if their cognitive ability is average.	Yes	See page 1 of the document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It does not take into account those children who struggle with pervasive demand avoidance. The descriptors of social issues are again too simplified. My autistic child is sociable and will initiate contact and wants friends. But he still struggles with friendships, is very self-directed and doesn't get social nuances. My three descriptors his use is would on the face of it seem mild when they are actually hugely impairing. I worry this new banding system will mean children who need support will not get it. It looks like it's been designed to make it harder get an EHCP. Schools will just say the high-quality teaching is enough and my concern would be they would not provide the support required. I worry my child would fall into a lower category in this new system and he definitely requires support in school to enable him to learn. Without the EHCP there would be insufficient support.	Yes	See page 1 of document	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It is really good to see so much detail in the banding descriptors. Missing from the banding descriptors - I cannot see anything in the banding descriptors about children who mask and faun at school. There appears in general to be an assumption that a child's anxiety or dysregulation or difficulty expressing emotions will be visible, and that anxiety leads to visibly distressed behaviour. Consider... 'Child may show anxiety' vs. 'Child may experience anxiety'. However anxiety can also lead to avoidance ie. a physical absence or a mental absence. A child may appear to the teachers to be fine and not dysregulated but the child is having difficulties which they make a big effort to conceal. My child is so far meeting her age related attainment levels because she is bright, but she is having great difficulty attending school and whilst at school is not able to learn to her best ability. In the banding descriptions school avoidance / attendance difficulties are mentioned in the Mental Health section, but should also be connected with neurodiversity and communication difficulties.	Yes	See page 1 of document	Yes	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children. See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It's all very well banding children but you never actually implemented anything for my son. Took 10 years for CAMHS to diagnose with no support in between or access to services like therapy. His whole academic life has been ruined and he will probably find it very hard to find work. Schools don't put any strategies in place and resort to excluding.	No	None	N/A	Thank you for your feedback, this has been noted.
Not that I can see.	No	None	N/A	Thank you for your feedback, this has been noted.
The banding and the reasons behind them are not clearly displayed on this forum , as a parent with a child with SEN th is abysmal, but then my experience with Haringey SEN team has been, from documents	No	None	N/A	Thank you for your feedback, this has been noted.

received with another child's name on them to having to go a tribunal to try and get an EHCP, which the council ignored, to having to pay for my child's diagnosis privately, paying for private support for them, and getting a physiologist from the council who told me that because I had paid privately for my child's diagnosis, that of course I was going to get a diagnosis. Changing the terminology of your banding does not fix the abysmal service I have received in the past.				
The banding does not really matter. Haringey Council employed specialist fail to provide adequate assessment of needs and with Harigney schools unwilling I to spend their notional budget on the support - this is a tick box exercise which not going to improve anything for the Haringey children.	No	None	N/A	Thank you for your feedback, this has been noted.
The functional abilities of CYP who may score severely on standard tests e.g for MLD/SLCN but are able to participate well even though they may be behind-especially as this affects a certain demography more than others	No	None	No	Thank you for your feedback, this has been noted.
There is no point in having progressive banding descriptors for deaf children. Regardless of level of hearing they ALL require access to BSL / deaf peers / deaf role models and specialist teaching. The evidence is very clear that deaf people brought up in a mainstream school have twice the mental health problems of the general population - this can be eased by them attending a specialist school.	Yes	Please see amends to section in relation to Sensory Needs (Deafness)	Yes	The law recognises that all children have a right to mainstream education, and that the decision to place a child in special school is made by parents on the advice of practitioners. Whilst many parents choose specialist provision for their deaf child, this is not a universal choice and this Bandings structure is designed to ensure that children are allocated the same resource regardless of where their parents choose to educate them. Please see amends to section in relation to Sensory Needs (Deafness)
There is no reference to preventative banding C in the chart or info?	No	None	N/A	Band C is described throughout the Bandings documents.
They need further detail so that specific nuances can be explained	No	None	Yes	The banding descriptors are already lengthy documents, however its is noted that Case studies would support implementation and will be included in the operational guidance.
Unfair that the children that actually do have send needs are judged the same as children that don't actually have send just more behaviour issues	No	None	No	It is recognised that many behavioural issues in children are due to unmet SEND needs and the Bandings are designed to recognise the range and extent of these.
What is missing in all banding is that you can't decide beforehand what the cost of the SEND provision will be and give it a cap amount pulled out of a hat. The cost will be determined by the need.	No	None	No	The Local Authority will use the Bandings document to ensure that the resources allocated to the Local Authority to meet the needs of children with SEND are distributed according to fair criteria.
Yes please state in each banding of the child will require 1:1 adult support	No	None	No	Evidence of good practice in SEND suggests that many children with or without SEND will require intervals of individual support throughout the day for varying lengths of time according to their needs.
Yes, an indication of resources. It's hard to compare with existing bandings when I don't know what these bands will entail in terms of funding compared to existing.	No	None	No	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document.

<b>Question 6: Are there any other comments you want to make about the proposed changings to the banding descriptors?</b>				
Comment	Covered in bandings	If Yes, where?	Action required	Service response
Banding descriptors are fair and incremental and can be evidenced by school and setting interventions and impact. The eight levels may result in very little difference between consequent banding levels. It may be helpful to have two tables - One band A - C likely to be able to have their needs met by settings and schools and then other bands likely to need additional assessment, equipment, and funding. Bands A-C/D could be met by a SENDCo cluster through joint commissioning. May go some way to prevent ladder effect in bands.	No	None	No	The Bandings are incremental, they are not designed to indicate provision, only to define the extent of children's needs. Provision for children will vary according to parental preference and school/ setting design, the resources allocated should be the same regardless of school/ setting.
Deafness needs to be taken independently of other needs. There are children with mild to moderate hearing loss who cannot cope in a mainstream setting.  In addition to this the level of support goes up as the level of hearing goes down - despite intervention. A child with a cochlear implant will only have that because they have a profound loss - but with the CI in place they could access more sound than a child with a lower loss but hearing aids. I would be interested to know who you consulted with on this document about deafness because I do not know a single deaf adult that would agree with it.	No	Yes, see Guidance notes and revision to wording in the Sensory Needs (deafness) section	Yes	This has been amended, see Guidance notes and revision to wording in the Sensory Needs (deafness) section.
Disagree with them all as children with send who need that extra support just won't get it.	No	No	N/A	Thank you for your feedback, this has been noted.
How many children each year age 0-5 get an ECHP and therefore are entitled to the top up funding? Most children I work with struggle to get the assessments they need until they are well into primary school. You literally can classify these bands anyway you want but you are not addressing the underlying issues in the system.	No	No	N/A	The intention of creating section C and having separate Banding for Early Years is to promote early intervention and support for younger children so that they do not need an EHCP in order to access top-up funding.  The Bandings work is one part of the Haringey SEND transformation programme. For further information see: <a href="https://www.haringey.gov.uk/children-and-families/local-offer">https://www.haringey.gov.uk/children-and-families/local-offer</a>

Children and families are being let down and schools are struggling to cope. There needs to be more SEND specialists and more special education facilities. I'm working with a 10 year old who has severe learning disabilities, hits, kicks, slaps, and disrupts her own class and at least 4 other classes every day and we cannot get a ECHP for her. I know you only want to know about your re-labelling, but I can't see how this improves life on the front line.				
I could not find any band descriptors. Where are they	No	No	N/A	The descriptors are on our local offer website with the consultation documents.
I have been getting used to the banding descriptors by referring to them whilst requesting/ reviewing EHCPs and they have been really helpful in pinning down need and provision and structuring my thinking about the range of needs in school.  I think this will support more accurate EHCP requests which provide the correct information to make a decision and match reasonable levels of support to meet need.  A lot of hard work has gone into producing these bandings and it is appreciated.	No	No	N/A	Thank you for your feedback, this has been noted.
I think greater thought could be put into the issues of autistic masking (especially in girls) and in old parlance "high functioning" autistic children. Masking and fawning cause burnout with devastating consequences including suicide. An acknowledgment that an autistic child may "seem" ok in school but they will still have needs and they should have those needs met. Taking away ta support/lego therapy/small group work or even a meet and greet at the start of the day for example, as they are "doing so well" can lead to a downturn in the child's wellbeing and is counterproductive.	Yes	See page 1 of document	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I think the bandings are a good idea but their use need needs to be evaluated and monitored.	No	No	N/A	Thank you for your feedback, this has been noted.
I think these descriptors will particularly discriminate against Autistic children who are higher functioning in the sense of their IQ. It needs to consider those children where after school restraint collapse happens.	Yes	See page 1 of document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I would be grateful for an explanation of how this impacts the support my child receives. He has an EHCP in a mainstream school, year six.	No	No	N/A	Any changes to the support which your child is offered in school must be discussed at his Annual Review in accordance with Children and Families Act 2014 and 2015 SEND Code of Practice.
If a child's parent/carers deception of need is much greater than a schools it'd be helpful to have a failsafe in place so that more consideration can be given to that child. The "They are fine in school" mantra can lead to a child failing to get the support they need asap then invariably the need grows and the support becomes more complex/expensive to provide. If the lack of correlation between need at home/school is flagged up earlier support should be given swiftly and accurately.  Importance should be placed on masking and fawning in autistic people. This is well known to cause burnout, anxiety and tragically suicide in individuals. Just because a child "seems" to be coping that might not be the case in fact. For example, that accommodation of a "meet and greet" by a ta at the start of the day shouldn't be taken away as the child is "doing so well" without careful consideration taking into account the views of all parties. Sometimes the child's needs might not be noticeable until a system changes - transition to a new school for example (this is well known especially amongst undiagnosed autistic girls). Just because a need is not overt doesn't mean it can be erased from a child's records/passport/pupil profile because in times of stress that need may come forcefully to the fore.	Yes	See page 1 of document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
If it means less money for schools, it is unfair and unworkable. Schools already have to fund the first £6000 of support, for a small single entry school with say 13 EHCPs this means there is nothing for preventative support, since high needs pupils mean there is no money for staff to do this	No	None	N/A	The Bandings are intended to allocate resources fairly according to the needs of children.
It must be very clear to parents especially WHY their child is allocated to the band they are, especially for those who are borderline cases... Please also somehow take into account, especially in deciding these borderline cases, that there is a lack of overall general funding available in mainstream schools who have a high number of SEN children demanding money from the school's budget, as this demand on the budget makes availability of everyday resources in the school itself more limited which in turn has a major impact on the whole school provision, that also affects the child concerned...	No	None	Yes	Operational guidance including Case studies will be issued to schools to support the implementation of the Bandings.
It seems positive that education professionals will work with parents/ carers and the child to decide which band best fits the child's needs. In our case I feel that external professional expertise (eg. from an Educational Psychologist) will also be required in order to assess which band best fits our child's needs.	No	None	Yes	Every school in Haringey has an allocated Education Psychologist who will work with schools to discuss and advise regarding the needs of children.
It should be a personalised description.	No	None	N/A	The intention of the Bandings documents is to categorise needs so that resources can be allocated fairly. The support for children allocated via the Bandings should always be personalised within an EHCP or SEND support plan.
It's not clear to me how a child will be given an overall banding score if they are Band b in some areas, Band c in others and Band d in others. Are the different areas weighted or do they only need to meet the threshold in one area to qualify as that band?	No	None	N/A	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children
No	No	None	N/A	

Please add on each banding services available to child	No	None	N/A	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document
Representing a special school, I am uncomfortable that the banding is geared to mainstream and so discounts the MSAG funding which is missing from the overall income within special schools.  Should a separate piece of work be undertaken to consider the correct banding within non-mainstream settings?	No	None	N/A	The financial work underpinning the resource allocations to Bandings will be overseen by the Schools Forum and made in accordance with the schools funding formula.
The banding and the reasons behind them are not clearly displayed on this forum, as a parent with a child with SEN th is abysmal, but then my experience with Haringey SEN team has been, from documents received with another child's name on them to having to go a tribunal to try and get an EHCP, which the council ignored, to having to pay for my child's diagnosis privately, paying for private support for them, and getting a physiologist from the council who told me that because I had paid privately for my child's diagnosis, that of course I was going to get a diagnosis. Changing the terminology of your banding does not fix the abysmal service I have received in the past.	No	None	N/A	Thank you for your feedback, this has been noted.
The banding does not really matter. Haringey Council employed specialist fail to provide adequate assessment of needs and with Harigney schools unwilling I to spend their notional budget on the support - this is a tick box exercise which not going to improve anything for the Haringey children.	No	None	N/A	Thank you for your feedback, this has been noted.
The consultation has been marketed and constructed very badly. There had been a clear understanding that EY bandings were being consulted on separately not with primary. There was no much information and to many closed questions and little opportunity to unpick the information. In the recent training for headteacher there was no mention of the EY banding and it was not used and so this is wholly inappropriate as primary and nursery schools have EY provision from 2-5 years. There is too much information, and this will put EAL and vulnerable families at a disadvantage and therefore their voice will not be heard in the consultation.	No	None	Yes	The Early years Bandings work has been supported by a group of key stakeholders. They will have separate operational guidance which will be shared with schools prior to implementation.
The documents are very hard to compare, which makes me suspicious that this is on purpose, and that the goal is to reduce funding.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
The reality is that you want to cut funding for the most vulnerable young people in the borough - this is unjust and will create further problems in their already challenging lives.	No	None	N/A	The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
The use of the terms many, several etc. is too vague. This needs to be more specific as how many difficulties a child has and if a child would be described as having many or several difficulties and therefore fall into what banding comes into question.	No	None	Yes	The banding descriptors are already lengthy documents, however its is noted that Case studies would support implementation and will be included in the operational guidance.
There are no financial amounts next to each bank. How are schools and parents meant to know if there is enough money to fund the support in relation to each band.	No	None	N/A	The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children
There had been a clear understanding about the two bandings having been consulted separately. There is too much information and closed questions to be able to comment. There has been no mention of the EY banding at the primary headteachers meeting. This is wholly inappropriate because they have EY provision. There is a lot of information being asked to people to read and respond to. This will put vulnerable families at a disadvantage and their voice will not be heard.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
Ultimately these descriptors would cut the funding and affect many schools.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
Using academic delay as a diagnostic tool for need is likely to be self-defeating if the overall objective is reduction in spending. Some children will meet the criteria elsewhere for the various degrees of support but will still be hanging on academically. Or children in special schools will hopefully start to get back towards age-expected outcomes, but will only be doing so because of the appropriate, targeted support at special. What we don't want to do is set up this up so that children who meet the criteria for help in every other way need to fail to get support - getting those kids back on track will be more costly than interventions that stop them failing.	No	None	N/A	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children
We are sending children with high SEND needs into mainstream schools. The school cannot cope and neither can the children.	No	None	N/A	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document
What is missing is that you can't give a set amount of hours when the school day week is not 27 hours but 30 minimum without any extra time to keep paperwork and admin. Realistically minimum time should be 32.5 hours a week.	No	None	N/A	The new bandings framework does not include an allocation of hours of support. This is the existing bandings framework and we are proposing to change this.

<p>The amounts that the SEND Team have come up with per week are not necessarily reflective of what the student will need. This does need to be reviewed. What is listed could be estimates but not fixed totals.</p>				
<p>Whilst reviewing existing EHCPs and making a judgement on best fit bands, it has become obvious that the current plans do not contain sufficient information about needs. There is discrepancy between what is written in the plans and our knowledge of the children, therefore if we are looking at funding with the current plans in mind, it will definitely decrease but the child's needs are still high (hope this makes sense). Moving forward I think SENCOs will be making sure that there is a lot more information in new EHCPs. Will the banding be looked at each annual review?</p>	No	None	Yes	Banding allocation should be considered at every Annual review based on the child's current needs.
<p>Why is all this money being spent on this rather than direct help for children in school. Communication poor no documentation of old to new mapping. THIS SHOULD NOT BE USED IN ANYWAY TO REMOVE OR REDUCE FUNDING FROM CHILDREN. Please focus on giving support to children and schools. The basic band descriptions were clear but not the additional matrix was not clear how this would link to the summarised one e.g. if you have child with no learning difficulties but needs constant support to achieve those so isn't high needs in cognitive and learning but is in the areas. What was the point of this matrix in the documentation it feels like this is trying to change the EHCPs interpretations and funding.</p>	No	None	N/A	The intention of the Bandings documents is to categorise needs so that resources can be allocated fairly. The support for children allocated via the Bandings should always be personalised within an EHCP or SEND support plan.