



Ministry
of Defence

DCS Directive 3.2.29 High Needs Funding

To be piloted Sept 2025 and reviewed Jul 2026

DCS May 2025 v1.0

General

Authorisation	Head DCS
Senior Responsible Owner	AH Specialist Support Services
Point of Contact	DCS OES Lead
Review Date	July 2026
Related Policy/Guidance	DfE SEN Code of Practice (2015)
	DfE High Needs Funding Arrangements 2024-25
	MOD Policy: Assessment of Support Needs for Accompanied Assignments Overseas
	JSP 342: Education of Service Children Overseas
	JSP 834: Safeguarding

Introduction

1. This Policy Directive¹ should be read in conjunction with the DCS Directive 3.2.22 Supporting Children with Special Educational Needs and/or Disabilities (SEND) and the DCS SEND Processes and Toolkit. It applies to Defence Children Services (DCS) Schools and Settings overseas but does not apply to Queen Victoria School (Scotland).
2. High Needs Funding (HNF) is only allocated where a child's needs cannot be met from within a School's or Setting's own delegated resources.
3. In accordance with DfE High Needs Funding Arrangements 2024-2025² and JSP 342, DCS aims to act in lieu of a Local Authority for DCS Schools, wherever practicable.
4. In England, pupils with SEND are funded through three funding elements;
 - a. Element 1 Schools get money for each pupil, based on actual pupil numbers. This is called the Age Weighted Pupil Unit (AWPU) and it is part of Schools' delegated funding. Some of this money is for general SEND provision. This might, for example, include the cost of providing the Special Educational Needs and Disability Coordinator (SENDCo) and some other resources.
 - b. Element 2 funding is SEND-specific and is delegated to Schools to provide SEND support for pupils who need it. This is support that is additional to or different from the support that most other children get. Element 2 funding is also part of Schools delegated budget. Government guidance says Schools should provide up to the first £6,000 (on top of the AWPU) of additional or different support for those pupils who need it, including those with a Service Child Assessment of Need (SCAN). This does not mean that the School or Setting

¹ Consideration has been given as to whether this Policy Directive is compliant with the Public Sector Equality Duty, and it has been concluded that it does.

² Local authorities play an essential statutory and strategic role in planning education services and places, and in supporting local schools and colleges, within a robust financial framework. They should work closely with schools and colleges that have pupils or students with high needs. In doing so, they should ensure there are clear processes for identifying, determining and allocating appropriate levels of top-up funding.

will spend £6,000 on every child with SEND. Sometimes Schools and Settings use funds to help groups of pupils. Some pupils will need less help, and some may need more.

c. Element 3 (or Top-Up funding) Where a School or Setting has a pupil who needs very expensive provision that might absorb a lot of the Element 2 funding, additional funding may be required. Element 3 funding, which can be used to make specific provision for an individual pupil, if the School can show it is necessary. For the purposes of this Policy Directive and a shared understanding of principles Element 3/Top-Up funding is known across DCS as HNF.

5. DCS School and Setting budgets include both Element 1 and Element 2 funding.

6. In its overseas Schools and Settings, DCS aims wherever possible, to align with DfE guidance. In England Schools are expected to fund the cost of initial support from within their School budgets (CoP section 6) up to the nationally prescribed threshold for HNF.

7. This nationally prescribed threshold for HNF is based on 38 weeks of full-time provision and is set at the first £6000 of support. Because of the differing costs of staff in DCS Schools and Settings, DCS set this threshold in LSA hours, rather than as a monetary value. The DCS threshold is 15 hours of 1:1 support.

8. Where a child's needs exceed that which can be funded from within the School or Setting budget, DCS will allocate HNF.

9. Where a child is part-time in FS1, this figure will be adjusted to reflect the proportion of the week the child is in school.

Year Group	Basic hours in school	Weeks per year	Baseline for High Needs funding
FS2- Year 13	32.5	38	15 hours
FS1	15	38	7 hours

When HNF will be allocated

Route One: Service Children's Assessment of Need (SCAN)

10. If a School or Setting has fully implemented the DCS Graduated Response, as set out in the SEND Processes, Toolkit and the DCS Policy Directive 3.2.22 Supporting Children with SEND in DCS Schools and Settings, it will become clear when a child has a specialist level of need that cannot be met solely from within the school's resources.

11. When a School or Setting submits a SCAN Assessment Request, the SCAN panel acts to provide 2LoDA (second level of Defence assurance) processes that check the school has made full use of the DCS Graduated Response and that all relevant actions have been taken before a statutory-comparable plan is compiled.

12. The SCAN panel will consider the written evidence that the School or Setting has put in place, all actions and interventions at the SEN support stage and how these actions have been monitored. The criteria used for this is in line with the statutory guidance set out in the DfE SEND Code of Practice (2015).

13. When a SCAN is completed and the SCAN Support Plan or SCAN Review has been ratified, it will be considered separately by the HNF panel, and a funding band will be allocated for 12 months until the next SCAN Review. HNF will be recommended in line with this band.

Route Two: MOD Assessment of Supportability Overseas (MASO)

14. DCS recognise that children accompanying their parents to an overseas DCS location may have high level support needs that are being met through additional adult support in their current location.

15. Where a child with this high level of support needs is found to be supportable through the MASO panel, the HNF Panel will consider the MASO evidence and make a banding assessment.

16. Any funding recommendations will be time limited until a more thorough assessment of their support needs can be undertaken. If funding is recommended, it is expected that the School or Setting will follow the SCAN process and submit a SCAN Assessment Request within two terms of the child arriving at the school.

Route Three: Gibraltar SEND Panel request

17. All children due to move to the Government of Gibraltar (GoG) Schools must undergo an assessment of support needs, as in other locations. Before this can happen, the GoG need to confirm a school place can be offered. If a child has any additional support needs, their case is considered by the GoG SEND Panel.

18. There are three possible outcomes from the GoG SEND panel:

- a. The child's needs can be met, and a place can be offered.
- b. The child's needs cannot be met, and a place cannot be offered
- c. The child's needs can be met if the MOD provide additional funding to meet support needs.

19. DCS are responsible for funding all education for Service children in Gibraltar. If the outcome of the panel is 18 (c), the panel's request will be considered at the HNF Panel, who will consider the case against the entitlement in JSP 342 Para 4.11³

Route Four: Early Years Inclusion

20. DCS recognises that some children may start in Early Years without having their needs fully assessed and understood. This may include children with emerging high needs.

21. Schools or Settings can write to the HNF panel to request additional funding to meet their needs if there is a clear health and safety risk.

22. Any funding recommendations will be time limited and conditional upon the School or Setting gathering evidence about the child's needs through the DCS graduated response for

³ Compulsory education fees that are normally free in the state-maintained education sector in England are eligible for reimbursement. These fees normally include tuition fees, non-refundable registration and enrolment fees and compulsory charges such as insurance, school medical fees or use of technology fees. Fees for extra tuition should only be reimbursed when that extra tuition is necessary and would normally be a free entitlement in the state-maintained education sector in England.

SEND. If funding is recommended, it is expected that the School or Setting will make a SCAN Assessment Request within two terms of the child arriving at the School.

23. Schools should ensure that any children being considered for HNF meet the following criteria:

- a. The DCS School or Setting will have fully utilised their normally available resources to address the needs of the pupil.
- b. The pupil's provision will have been assessed against the specialist level checklist/s in the DCS SEND Processes and Toolkit.
- c. The School or Setting will have sought advice and further guidance from specialist professionals as part of the 'assess, plan, do and review' cycle. This will be reflected in the Individual Support Plan (ISP) review paperwork.
- d. Recommendations from professionals will have been implemented and evaluated to evidence an increasingly personalised provision. This will be reflected in the ISP review paperwork.

24. DCS Schools and Settings will be expected to provide the following evidence to support their applications:

- a. Individual provision map
- b. Professional reports, as appropriate, including EP assessment or discussion record
- c. Individual Support Plans (ISP) that show the implementation of recommendations from professionals and the 'assess, plan, do and review' cycle. These should include details of continuous assessment
- d. Risk assessment (if appropriate)

25. All applications for funding must be sent to the DCS OES team e-mail RC-DCS-HQ-OES@mod.gov.uk.

Bandings

26. In England, many Local Authorities have systems which indicate the range of HNF that might be provided for children and young people with a particular complexity of need. These provide clear and transparent funding arrangements for children with SEND that can be applied consistently.

27. All recommendations for HNF will be made in line with the DCS banding descriptors set out in **Annex A**. Funding calculations will be based on local LSA2Q LEC costings.

28. The bandings set out the provision a child is likely to need, depending on their level of need. They also set out descriptions of the types of need a child at this band may have. These banding descriptors are for illustration purposes only and must not be used as a checklist.

29. Banding assessments are made on the evidence available to the HNF Panel at the time of the meeting.

HNF Panel Terms of Reference

30. The HNF Panel sits monthly to consider cases and is responsible for making recommendations about the allocation of HNF within DCS.
31. The HNF Panel is made up of:
 - a. the Overseas Education and Supportability Lead (Chair).
 - b. the SEND Service Manager, or a representative delegated to make recommendations on their behalf
 - c. the Senior Educational Psychologist
 - d. the OES and EPSL Case Officers, as required
32. The Panel considers the full range of evidence provided and make banding decisions based on the descriptors at **Annex A**.
33. The Panel considers the evidence in the context of the School or Setting use of SEND delegated funding as a whole.
34. The Panel must respond in writing to the Head Teacher or Setting Manager within 10 working days of the panel meeting.

DCS High Needs Banding Assessment

Official-Sensitive Personal when complete

To be completed and ratified by the DCS High Needs Funding Panel.

Assessments should be made on the provision required to meet the Special Educational Needs set out in the evidence considered. The descriptors of need are included for guidance and should not be used as a checklist to match needs to provision.

Child's Name		Date of Birth	
Name of School		Date of Assessment	
Route	Route 1- SCAN <input type="checkbox"/> Route 2- MASO <input type="checkbox"/> Route 3- Gibraltar <input type="checkbox"/> Route 4- Early Years/Emergency <input type="checkbox"/>	Evidence considered	SCAN <input type="checkbox"/> EP Report <input type="checkbox"/> HI/VI report <input type="checkbox"/> EHCP/Stat plan <input type="checkbox"/> MASO docs <input type="checkbox"/>
Panel recommendation	Band 1 <input type="checkbox"/> Band 2 <input type="checkbox"/> Band 3 <input type="checkbox"/> Band 4 <input type="checkbox"/>	Number of hours of HNF recommended	5 hours <input type="checkbox"/> 10 hours <input type="checkbox"/> 15 hours <input type="checkbox"/> 17.5 hours <input type="checkbox"/>
Local cost of 1hr LSA time	£	Total HNF recommended	£

Recommendations for Route 1 funding are valid for one school year, until the SCAN review is carried out.

Recommendations for Route 2 and Route 4 funding are valid for two whole terms, or until a SCAN is produced, whichever is earliest.

Recommendations for Route 3 funding are valid for the duration of the assignment to Gibraltar.

Communication and Interaction

	Band 1	Band 2	Band 3	Specialist- Band 3
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Banding descriptor- the child is likely to require:	Small group/individual support up to 15 hrs per week, which may also cover unstructured times as enhanced supervision. <input type="checkbox"/>	Small group/individual support which may also cover unstructured times as enhanced supervision. May require High Needs Funding (up to 5 hrs). <input type="checkbox"/>	A highly adapted timetable and modified curriculum. Additional staffing in the class to provide sustained support on an individual basis to also cover unstructured times as enhanced supervision. Will require High Needs Funding (up to 10 hrs). <input type="checkbox"/>	Additional staffing to provide a sustained tailored curriculum throughout the day, including tailored activities in unstructured time. Alternative communication methods used as a primary form of communication. Substantial planning to manage safety and personal needs. Will require HNF all day, not sustainable over time. <input type="checkbox"/>
Communication needs the child is likely to have	See SEND Processes and Toolkit Language ability substantially below that which is expected for the age/stage.	Have a language ability which is substantially below that expected for age resulting in functional limitations in effective communication, social participation or academic achievement.	In addition to the points in Band 2, the pupil will: <ul style="list-style-type: none"> • Need significant adaptations made to verbal language to be able to participate in class activities. • Specific/targeted visual strategies to enhance communication throughout the day. 	In addition to the points in Bands 2 and 3, the pupil may: <p>Have significant language needs that include a reliance on non-verbal communication to complete tasks (adult's gestures, copying peers) and requires all verbal interactions to be supported by an adult, including communicating their own wants, needs and preferences.</p> <p>Communication difficulties make it difficult to assess understanding and progress.</p>
Social communication needs child is likely to have	See SEND Processes and Toolkit <ul style="list-style-type: none"> • Difficulties in reciprocal conversation and in understanding and maintaining relationships affecting everyday life both in and outside of the classroom. • Displays a preference to follow own agenda rather than that of the class, struggle to move on from an activity or seek repetitive acts. 	In addition to the points in Band 1, the pupil will: <ul style="list-style-type: none"> • Displays strong pre-occupations and need support to prepare for changes in routines associated with elevated levels of anxiety. • In addition to difficulties with reciprocal relationships, may avoid direct interaction with others. 	In addition to the points in Bands 1 and 2, the pupil may: <p>Demonstrate an inflexibility in thought processes associated with elevated levels of anxiety including strong preoccupations.</p> <ul style="list-style-type: none"> • Very limited ability to switch attention to and follow an adult directed task or unfamiliar instruction. 	

Cognition and Learning

	Band 1	Band 2	Band 3
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Banding descriptor- the child is likely to require:	Small group/individual support up to 15 hrs per week, which may also cover unstructured times as enhanced supervision. <input type="checkbox"/>	Small group/individual support which may also cover unstructured times as enhanced supervision. May require High Needs Funding (up to 5hrs). <input type="checkbox"/>	A highly adapted timetable and modified curriculum. Additional staffing in the class to provide sustained support on an individual basis to also cover unstructured times as enhanced supervision. Will require High Needs Funding (up to 10 hrs). <input type="checkbox"/>	Additional staffing to provide a sustained tailored curriculum throughout the day, including tailored activities in unstructured time. Substantial planning to manage safety and personal needs. Will require HNF all day – not sustainable over time. <input type="checkbox"/>
Needs the child is likely to have (not to be used as a checklist)	Working significantly below ARE in most subjects for example: <ul style="list-style-type: none"> • Academic attainment outside KS expectations for majority of KS. • May have scores in the extremely low range on standardised assessments of cognitive ability. • May have very uneven profile of cognitive abilities. • May have significant delay in reasoning skills and difficulties across all areas of the curriculum. May have significant difficulties retaining skills and information, generalising skills, • Skills to plan, start and sustain independent work substantially below age-appropriate levels. 	Academic attainment likely to be outside KS expectations for the whole of the Key Stage <ul style="list-style-type: none"> • Have scores in the extremely low range on standardised assessments of cognitive ability. • Experience significant difficulties across all areas of the curriculum. • Very slow rate of progress despite a high level of intervention. • Significant difficulties in making inferences, generalisation and transferring skills affecting personal independence. • Very limited ability to sustain engagement in adult-directed or self-chosen activities 	Academic attainment at pre-KS1 levels for majority of school career. <ul style="list-style-type: none"> • Due to level of learning difficulties unable to accomplish personal care, self-help, and independence skills throughout the school day. • Progress measured in small increments, for example using a fine-grained assessment framework such as B-squared. 	

SEMH DCS Specialist Level of Need

Banding descriptor- the child is likely to require:	Band 1		Band 2	Band 3
	<p>Small group/individual support up to 15 hrs per week, which may also cover unstructured times as enhanced supervision. <input type="checkbox"/></p>	<p>Small group/individual support which may also cover unstructured times as enhanced supervision.</p> <p>May require High Needs Funding (up to 5 hrs). <input type="checkbox"/></p>	<p>A highly adapted timetable and modified curriculum.</p> <p>Additional staffing in the class to provide sustained support on an individual basis to also cover unstructured times as enhanced supervision.</p> <p>Will require High Needs Funding (up to 10 hrs). <input type="checkbox"/></p>	<p>Additional staffing to provide a sustained tailored curriculum throughout the day, including tailored activities in unstructured time.</p> <p>Substantial planning to manage safety and personal needs.</p> <p>Will require HNF all day – not sustainable over time. <input type="checkbox"/></p>
<p>Needs the child is likely to have (not to be used as a checklist)</p>	<p>Positive behaviour management plan in place</p> <ul style="list-style-type: none"> • Have difficulties in self-regulation and/or maintaining relationships affecting everyday life, requiring frequent adult support or mediation throughout the day. • Display a preference to follow own agenda rather than that of the class, struggle to move on from an activity or seek repetitive acts. • Have social skills substantially below age-appropriate levels in turn taking, sharing resources, managing disagreements and differences etc. • Have emotional skills substantially below age-appropriate levels in recognising, naming own emotions and understanding feelings, thinking and perspectives of others. • Have negative beliefs about themselves and others leading to heightened responses to everyday setbacks and challenges. • Risk assessment and positive behaviour management plan in place 		<p>In addition to the points in Band 1, the pupil may:</p> <ul style="list-style-type: none"> • Be experiencing levels of anxiety or difficulties with self-regulation that mean they are frequently overwhelmed during the day and leave the class or are unable to join class/small group activities. 	<p>In addition to the points in Bands 1 and 2, the pupil may:</p> <ul style="list-style-type: none"> • Have a risk assessment and behaviour management plan which identifies high levels of close supervision to ensure personal safety or safety of others. • Have a positive handling plan • Have an alternative programme of individualised activities to facilitate engagement with education for a majority of lessons.

Physical and Sensory

	Band 1		Band 2	Band 3
<p>Banding descriptor- the child is likely to require:</p>	<p>Small group/individual support up to 15 hrs per week, which may also cover unstructured times as enhanced supervision.</p> <p>Advisory support from HI/VI Service (if applicable) <input type="checkbox"/></p>	<p>Small group/individual support which may also cover unstructured times as enhanced supervision.</p> <p>Advisory support from HI/VI Service (if applicable)</p> <p>May require High Needs Funding (up to 5 hrs) <input type="checkbox"/></p>	<p>A highly adapted timetable and modified curriculum.</p> <p>Additional staffing in the class to provide sustained support on an individual basis to also cover unstructured times as enhanced supervision.</p> <p>Advisory support from HI/VI Service (if applicable)</p> <p>Will require High Needs Funding (up to 10 hrs) <input type="checkbox"/></p>	<p>Additional staffing to provide a sustained tailored curriculum throughout the day, including activities in unstructured time.</p> <p>Substantial planning to manage safety and personal needs.</p> <p>Advisory support from HI/VI Service (if applicable)</p> <p>Will require HNF all day – not sustainable over time. <input type="checkbox"/></p>
<p>Physical/Sensory- needs the child may have (not to be used as a checklist)</p>	<p>See SEND Processes and Toolkit</p> <p>Implementation of a specific program of care developed and monitored by health professionals or HI/VI advisory staff.</p>	<ul style="list-style-type: none"> • Curriculum access may not be possible without mediation and/or adaptations of curriculum materials and/or adaptive equipment. • Have minor difficulties with daily living skills such as dressing, personal care, eating and drinking. • Has limited independence in managing interventions required for their condition e.g., personal care, mobility. • Able to use mobility aid or assistive device with some competence e.g., walking frame or wheelchair. • Physical and/or medical condition begins to have impact on self-esteem, social interactions, and emotional regulation 	<ul style="list-style-type: none"> • Requires assistive devices to access curriculum with substantial adaptations of all learning materials. • Child uses a mobility aid, specialist seating or requires support in moving, positioning and personal care, eating. • Have substantial communication/recording needs associated with physical disability. • Physical and/or medical condition have significant impact on self-esteem, social interactions, and emotional regulation • Have mobility that is moderately impaired and experiences difficulties on stairs and with spatial orientation. 	<ul style="list-style-type: none"> • Requires assistive devices to access curriculum with substantial adaptations of all learning materials. • Physical, medical, or sensory condition may impact on all areas of independent learning and emotional wellbeing through the school day. • Highly reliant on adults for support in moving, positioning, personal care. • Unable to independently manage transfers and personal care. • Multisensory impairment with severe impact on development