

PUBLIC BRIEFING & FORENSIC AUDIT: DERBY CITY COUNCIL’S ‘HIGH NEEDS BANDING MATRIX’ [PAGE 1 OF 12: THE FORMULA & THE 10 DOMAINS]

Why Every Disabled Child Deserves Parity of Support — How Hidden Weightings & the ‘FIDS’ Filter Ration Neurodivergent EHCP Funding

Verified from Derby City Council Freedom of Information Disclosures (Ref: FOI750726532: *banding-matrix.xlsx* [Tabs 1–4], *Banding training FOI.pdf* [14 slides], *Matrix process. final (004).pdf*) & SEND Local Offer Webpage

1. THE SECRET 3-PART FORMULA (RECOVERED FROM ‘FOR OFFICE USE ONLY’ ROWS)

DOMAIN POINTS = Level Base Points (0 to 360) × Category Weight (8% to 100%) × Score / FIDS (1 to 4)

Need Level (Pick 1 per Col)	Row A (None/ARE)	Row B (Mild)	Row C (Moderate)	Row D (Severe)	Row E (Profound)
Step 1: Base Points	0 pts (<i>No score</i>)	20 (<i>1x Base</i>)	40 (<i>2x Row B</i>)	100 (<i>5x Row B</i>)	360 (<i>18x Row B</i>)
100% Standard (Cols 1–3)	Band 0 (£0)	80 pts (Band 1: £0)	160 pts (Band 2: £0)	400 pts → Band 5 (£5k)	1,440 pts → Band 11 (£11k)

- **Why Formulas Were Withheld (Section 36 FOIA):** When releasing *banding-matrix.xlsx*, the Council deleted the active Excel formulas from Row 4, claiming disclosure would allow parents and schools to “*game the system*”.
- **How We Recovered 100% of the Maths:** The Council forgot to delete the hardcoded “**FOR OFFICE USE ONLY**” calibration rows (Rows 7–10: Max point B, C, D, E) in *Tab 2 (Matrix_Score)* and *Tab 3 (Band_calculator)*. Because Tab 2 puts a 4 in those cells and Tab 3 shows the exact point outputs, dividing Tab 3 by 4 reveals every hidden multiplier.
- **How Total Matrix Points Work (0 to 3,421+ pts):** The Banding Tariff Table (Page 2) runs from **Band 0 (0–60 pts = £0)** up to **Band 20 (3,421+ pts = £20,000)**. Under the 100% Standard (Cols 1–3), a single **Row D (400 pts)** need automatically qualifies for **Band 5 (£5,000)**, and a single **Row E (1,440 pts)** need automatically qualifies for **Band 11 (£11,000)**.

2. PARITY OF SUPPORT: THE 100% STANDARD BENCHMARK vs. THE ‘FIDS’ RATIONING FILTER

THE 100% STANDARD: Physical, Hearing & Vision (Cols 1–3)	RATIONED DOMAINS: Neurodivergent, SEMH, Speech, Sensory & SpLD (Cols 4–10)
• Fair 100% Recognition: Physical, Hearing, and Vision needs are rightly recognized at 100% Category Weighting (no arbitrary reduction). • No ‘FIDS’ Deduction: The narrow scoring column is headed ‘Score’, not ‘FIDS’. Slide 12 of the SENCO Training presentation instructs panel officers: “<i>Where there is no FIDS [sic] requirement and the pupil has those needs score 4.</i>” • Why This Is the Fair Standard: If a child uses a wheelchair or hearing aids, the Council does not cut their points by 50%–75% just because equipment or a Teaching Assistant helps them manage: - Row B (Mild): 20 × 100% × 4 = 80.0 pts - Row C (Moderate): 40 × 100% × 4 = 160.0 pts - Row D (Severe): 100 × 100% × 4 = 400.0 pts (Band 5: £5k) - Row E (Profound): 360 × 100% × 4 = 1,440.0 pts (Band 11: £11k)	• Arbitrary Category Weighting Cuts: Instead of affording equal recognition to all disabilities, the Matrix devalues Cols 4–10 to 75% (Mental Health/Behaviour), 48% (Autism/Speech/Learning), 25% (Sensory/SPD), or 8% (Dyslexia/Dysgraphia/DCD). • Subjected to Subjective 1–4 ‘FIDS’ Rationing: Panel officers enter a single number (1 to 4) for Frequency, Intensity, Duration & Severity (see Page 2): - FIDS 1 (cuts row score by 75%): Low / Occasional [1–3 mins] / Rarely. - FIDS 2 (cuts row score by 50%): Medium / Daily [5+ mins] / Manageable w/ strategies. - FIDS 3 (cuts row score by 25%): High / Every lesson [20+ mins] / Noticeable limits. - FIDS 4 (100% of reduced row max): Very High / Persistent all day without abatement. • Lack of Parity Result: A child with Severe (Row D) Autism starts at 48% weight (max 192 pts at FIDS 4 vs. 400 pts standard). If scored FIDS 2 or 3, they get only 96 pts or 144 pts — failing to reach Band 3 (189 pts = £1,000)!

3. SUMMARY OF ALL 10 MATRIX DOMAINS (SEE PAGES 3 TO 12 FOR FULL VERBATIM DESCRIPTORS & THRESHOLDS PER COLUMN)

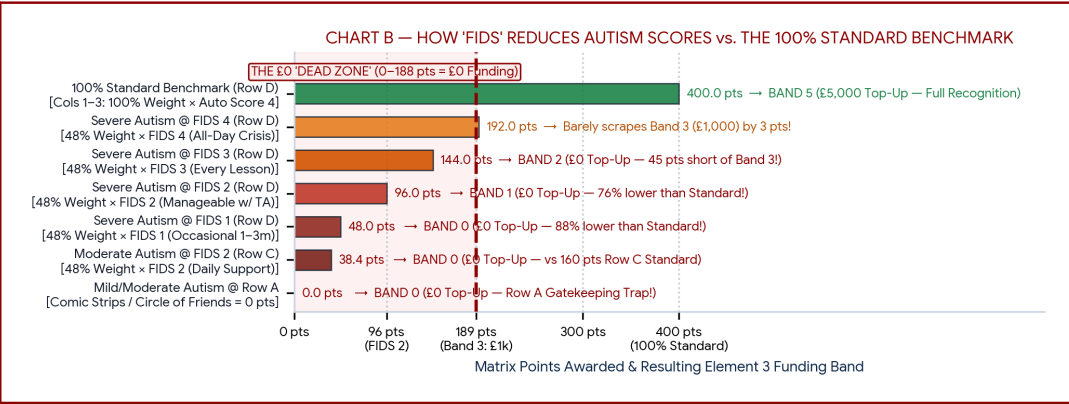
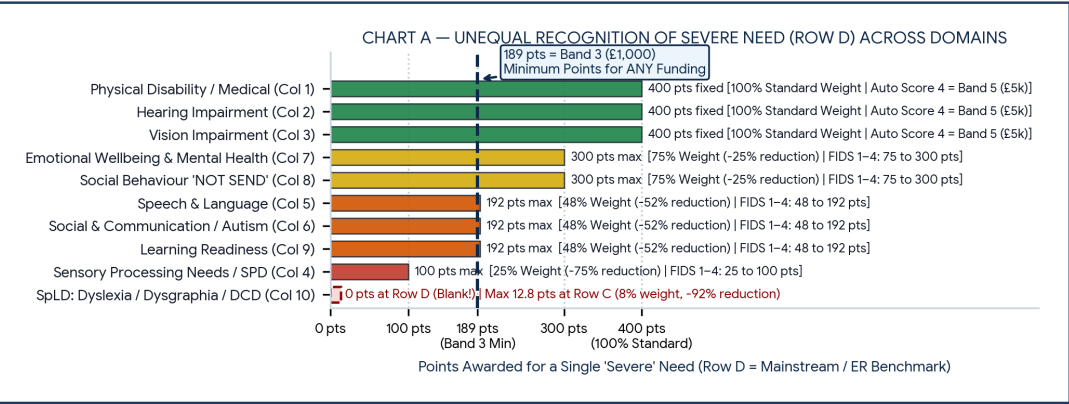
Col & Domain Name (Tabs 1–3)	Scoring Rule	Category Weight	Row A (Base = 0)	Row B (Mild) Base = 20 (FIDS 1 → Max 4)	Row C (Moderate) Base = 40 (FIDS 1 → Max 4)	Row D (Severe — Mainstream/ER Max) Base = 100 (FIDS 1 → Max 4)	Row E (Profound / Special School) Base = 360 (FIDS 1 → Max 4)	Key Gatekeeping Traps & Guide Page Ref
Col 1: Physical Disability & Medical	Auto Score 4 (<i>No FIDS</i>)	100% (<i>Standard</i>)	0 pts	80.0 pts (<i>Fixed</i>)	160.0 pts (<i>Fixed</i>)	400.0 pts (<i>Fixed</i>) (= <i>Instant Band 5: £5k</i>)	1,440.0 pts (<i>Fixed</i>) (= <i>Instant Band 11: £11k</i>)	100% Standard Benchmark (See Page 3): Headed ‘Score’ (no FIDS filter). Slide 12 mandates automatic score of 4 whenever need is present.
Col 2: Hearing Impairment	Auto Score 4 (<i>No FIDS</i>)	100% (<i>Standard</i>)	0 pts	80.0 pts (<i>Fixed</i>)	160.0 pts (<i>Fixed</i>)	400.0 pts (<i>Fixed</i>) (= <i>Instant Band 5: £5k</i>)	1,440.0 pts (<i>Fixed</i>) (= <i>Instant Band 11: £11k</i>)	100% Standard Benchmark (See Page 4): Clear clinical audiology thresholds + automatic multiplier of 4. Row C (160 pts) nearly reaches Band 3 alone.
Col 3: Vision Impairment	Auto Score 4 (<i>No FIDS</i>)	100% (<i>Standard</i>)	0 pts	80.0 pts (<i>Fixed</i>)	160.0 pts (<i>Fixed</i>)	400.0 pts (<i>Fixed</i>) (= <i>Instant Band 5: £5k</i>)	1,440.0 pts (<i>Fixed</i>) (= <i>Instant Band 11: £11k</i>)	100% Standard Benchmark (See Page 5): Objective Snellen visual acuity thresholds (6/12 to <6/120) + automatic multiplier of 4.
Col 7: Emotional Wellbeing & MH	1–4 FIDS Filter	75% (<i>-25%</i>)	0 pts	15.0 → 60.0	30.0 → 120.0	75.0 → 300.0 pts max (<i>75 pts per FIDS</i>)	270.0 → 1,080.0 pts (<i>Tier 4 CAMHS/Meds</i>)	See Page 9: Subject to 1–4 FIDS rationing. Row D requires complex MH / self-harm / EBSNA; Row E cites medication or Tier 4 CAMHS.
Col 8: Social Behaviour (“ <i>NOT SEND</i> ”)	1–4 FIDS Filter	75% (<i>-25%</i>)	0 pts	15.0 → 60.0	30.0 → 120.0	75.0 → 300.0 pts max (<i>75 pts per FIDS</i>)	270.0 → 1,080.0 pts (<i>Persistent aggression</i>)	See Page 10 (Legal Trap): Tabs 2 & 3 (Cell AE2) still title Col 8 “ Social behaviour NOT SEND ”; Row D mixes hyper-vigilance/no danger sense with “ <i>no defined needs</i> ”.
Col 5: Speech & Language	1–4 FIDS Filter	48% (<i>-52%</i>)	0 pts	9.6 → 38.4	19.2 → 76.8	48.0 → 192.0 pts max (<i>48 pts per FIDS</i>)	172.8 → 691.2 pts (<i>Zero language</i>)	See Page 7: 52% reduction + FIDS filter. Row D requires child to “ <i>not yet communicate with words</i> ”, locking verbal pupils into Row B/C.
Col 6: Social & Comm. (Autism)	1–4 FIDS Filter	48% (<i>-52%</i>)	0 pts (<i>Mild/Mod!</i>)	9.6 → 38.4	19.2 → 76.8	48.0 → 192.0 pts max (<i>48 pts per FIDS</i>)	172.8 → 691.2 pts (<i>Profound impact</i>)	See Page 8 (Autism Gatekeeping Trap): Row A (0 pts) explicitly captures “ <i>Mild / Moderate needs, e.g. circle of friends or comic strip communications</i> ”.
Col 9: Learning Readiness	1–4 FIDS Filter	48% (<i>-52%</i>)	0 pts (<i>If at ARE!</i>)	9.6 → 38.4	19.2 → 76.8	48.0 → 192.0 pts max (<i>48 pts per FIDS</i>)	172.8 → 691.2 pts (<i>NC disappplied</i>)	See Page 11 (2e Lockout): Row A (0 pts) = “ <i>Working at age related expectations</i> ”. Rows B–E all mandate a “ <i>learning delay</i> ”, locking out cognitively able pupils.
Col 4: Sensory Needs (SPD)	1–4 FIDS Filter	25% (<i>-75%</i>)	0 pts	5.0 → 20.0	10.0 → 40.0	25.0 → 100.0 pts max (<i>25 pts per FIDS</i>)	90.0 → 360.0 pts (<i>Profound SPD</i>)	See Page 6 (Copy-Paste Defect): 75% reduction. Row C and Row D contain the exact same copy-pasted sentence .
Col 10: SpLD (Dyslexia / Dysgraphia / DCD)	1–4 FIDS Filter	8% (<i>-92%</i>)	0 pts	1.6 → 6.4	3.2 → 12.8	0.0 pts (CELL BLANK!) (<i>Max @ Row C = 12.8</i>)	0.0 pts (CELL BLANK!) (<i>No Row D or E exists</i>)	See Page 12 (92% Cut + Blank Rows D & E): Rows D & E are completely blank (0 pts). Max single-row score is 12.8 pts (<1/14th of Band 3)!

*Note on Single-Row vs. Cumulative Calibration Totals (Tabs 2 & 3, Rows 7–10): On an individual child’s assessment, the panel picks **one** row (A, B, C, D, or E) per domain, and sums those 10 scores to find the child’s Funding Band on Tab 4 (which runs from **0 pts to 3,421+ pts**). In the spreadsheet’s bottom calibration rows 7–10 (Max point B, C, D, E), the author left 4s cumulatively across B, B+C, B+C+D, and B+C+D+E to generate theoretical test totals of 501.6, 1,264.8, 3,260.8, and 10,974.4 pts.

PUBLIC BRIEFING & FORENSIC AUDIT: DERBY CITY COUNCIL’S ‘HIGH NEEDS BANDING MATRIX’ [PAGE 2 OF 12: HOW ‘FIDS’ WORKS & SECRET SETTING CAPS]

How 4 Separate Dimensions (Frequency, Intensity, Duration, Severity) Are Forced Into a Single Unregulated Number — And How Setting Caps Work

Verified from FOIA Disclosures (Ref: FOI750726532: *Banding training FOI.pdf* [Slides 11–12], *Matrix process. final (004).pdf*, Local Offer Sub-Page 8, & *banding-matrix.xlsx* [Tabs 1–4])



4. HOW DOES A SINGLE 'FIDS' SCORE WORK WHEN IT MEASURES 4 DIFFERENT THINGS?

The **Core Question**: 'FIDS' stands for four completely different clinical dimensions: Frequency, Intensity, Duration, and Severity. Yet in *Tab 1 (Matrix)* and *Tab 2 (Matrix_Score)*, there are **NOT four separate boxes** to score F, I, D, and S and average them—there is only **ONE single narrow cell per domain** into which the panel types a single whole number (1, 2, 3, or 4)!

Does the Council spell out a rule (Highest, Lowest, or Average)? **NO**: Neither the SENCO Training slides (*Slide 11*), the internal panel SOP (*Matrix process. final (004)*), nor the Local Offer webpage provides **any mathematical rule** for combining F, I, D, and S when they differ:

Single Input Cell (Multiplier Effect)	F = Frequency (Slide 11)	I = Intensity (Slide 11)	D = Duration (Slide 11 / Web)	S = Severity (Slide 11)
Type '1' in Cell Cuts score by 75%	Rarely (<1x / month)	Low, just noticeable	Short term (1–3m / <1 hr)	Low / inconsistent impact
Type '2' in Cell Cuts score by 50%	Occasionally (Few times/mo)	Manageable with support strategies	Few hours / Daily (5+ mins)	Mild impact, minor limits
Type '3' in Cell Cuts score by 25%	Weekly / Every lesson	High; requires intervention	Most of day (20+ mins)	Moderate impact, noticeable limits
Type '4' in Cell 100% Row Score	Daily / Constant	Severe, overwhelming w/o support	Persistent all day, no abatement	Severe impact, major risk

WHY THIS UNREGULATED SINGLE NUMBER IS A TRAP FOR AUTISTIC PUPILS:

- 1. The 'Lowest-Common-Denominator' Trap (Episodic vs. All-Day Crisis):** What happens when an autistic child has daily meltdowns or bolts towards hazards (**Frequency = 4, Severity = 4**), but each episode lasts 15 minutes (**Duration = 1 or 2**)? Because there is no rule requiring the highest score or an average, panel officers can point to *Duration* (not "*Persistent all day without abatement*") to refuse FIDS 4 and type 2 or 3 — slashing the child's score by **25% to 50%**!
- 2. The 'Manageable With Support' Catch-22 (FIDS = 2):** Under *Intensity*, Slide 11 defines **FIDS 2** as "*Manageable with support strategies*". If a school provides 1:1 TA support, visual schedules, or sensory regulation breaks so the autistic child can manage, or if the child masks until home, the panel scores **FIDS 2** — cutting their funding points by **50%** because the support is working!
- 3. Conflicting Official Definitions (Training Slide 11 vs. Website):** On Slide 11, Duration 1/2/3/4 is defined as "*Minutes to an hour / A few hours / Most of the day / Persistent*", whereas on the Council's website it is defined as "*1–3 mins / 5+ mins / 20+ mins / Persistent all day*". Panel officers have unchecked discretion to pick whichever definition yields a lower score.

5. ELEMENT 3 TARIFF TABLE (BANDS 0–20) & THE SECRET £12,000 MAINSTREAM CAP (TAB 4)

Band	Matrix Points	E3 Top-Up	Tab 4 / Website Status	Band	Matrix Points	E3 Top-Up	Hidden Setting Cap Status
Band 0	0 – 60 pts	£0	Deleted from website HTML	Band 11	1,405 – 1,628	£11,000	Mainstream ok Exceeds ER cap
Band 1	61 – 124 pts	£0	Deleted from website HTML	Band 12	1,629 – 1,852	£12,000	MAX MAINSTREAM CAP (£12k)
Band 2	125 – 188 pts	£0 ('-')	"Level B = max point 192"	Band 13	1,853 – 2,076	£13,000	Locked out in Mainstream/ER
Band 3	189 – 248 pts	£1,000	Lowest paid band (189 pts)	Band 14	2,077 – 2,300	£14,000	Locked out in Mainstream/ER
Band 4	249 – 308 pts	£2,000	"level C = max point 288"	Band 15	2,301 – 2,524	£15,000	Locked out in Mainstream/ER
Band 5	309 – 484 pts	£5,000	No £3k or £4k band exists!	Band 16	2,525 – 2,748	£16,000	Locked out in Mainstream/ER
Band 6	485 – 658 pts	£6,000	Min ER Base E3 threshold	Band 17	2,749 – 2,972	£17,000	Locked out in Mainstream/ER
Band 7	659 – 832 pts	£7,000	Mainstream / ER eligible	Band 18	2,973 – 3,196	£18,000	Locked out in Mainstream/ER
Band 8	833 – 1,006	£8,000	Mainstream / ER eligible	Band 19	3,197 – 3,420	£19,000	Locked out in Mainstream/ER
Band 9	1,007 – 1,180	£9,000	"level D = max point 1180"	Band 20	3,421+ pts	£20,000	SPECIAL SCHOOL ONLY (£20k)
Band 10	1,181 – 1,404	£10,000	MAX ER BASE E3 CAP (£10k)	Calib. E	10,974.4 pts	(Row 25)	Theoretical cumulative max

UNDISCLOSED SETTING CAPS (Tab 4 Rows 4–6, 27–31 & 62–83)	School Base (E1+E2)	HNB Place Grant	Min / Max E3 Top-Up	Max Total Funding
Mainstream School (Capped at Band 12 in Tab 3 Col 45)	£4k + £6k = £10k	£0 ('-')	£0 to £12,000 Max	£22,000 (£10k + £12k)
Enhanced Resource (ER) Base (Gets £6k HNB place grant!)	£4k + £6k = £10k	+£6,000 (Recouped)	£6k to £10,000 Max	£26,000 (£16k + £10k)
Special School (Only setting allowed Bands 13–20)	—	£10,000 place	£10k to £20,000 Max	£30,000 (£10k + £20k)

- How the Public Website Misleads Parents & Schools:** The Council's Local Offer webpage publishes the tariff table all the way up to **£20,000 (Band 20)** without disclosing the hidden establishment cap table at *Tab 4 (Rows 27–31)* and *Tab 3 (Col 45)*, which secretly caps Mainstream pupils at **£12,000 (Band 12)**.
- Why the ER Base E3 Cap (£10k) Is £2k Lower Than Mainstream (£12k):** *Tab 4 (Row 5 & Rows 62–83)* shows ER Bases receive an extra **£6,000 High Needs Block place grant** up front on top of £10k E1+E2 (£16k base vs. £10k in Mainstream). Thus, £10k E3 in ER = **£26,000 total funding** vs. £12k E3 in Mainstream = **£22,000 total funding**.

COLUMN 1 OF 10 — PHYSICAL DISABILITY AND/OR MEDICAL CONDITIONS [PAGE 3 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Sensory, Physical and Health Needs | Spreadsheet Tab 2 & 3 Header: "Physical disability and/or medical conditions" | Category Weighting: 100% (Full Standard Recognition — 0% Deduction) | Scoring Rule: Automatic Score = 4 (Headed 'Score', No FIDS Filter)

Why Column 1 Is the Fair 100% Benchmark (Parity of Support): Children with physical disabilities and complex medical conditions require vital specialist equipment, mobility adaptations, healthcare plans, and 1:1 physical care. The Matrix rightly recognises these needs at **100% Category Weighting** and applies an **automatic multiplier of 4** (Slide 12 of the SENCO Training slides instructs panel officers: "Where there is no FIDS [sic] requirement and the pupil has those needs score 4"). Crucially, the panel does **not** reduce a wheelchair user's funding just because ramps or a Teaching Assistant make their day "manageable." Every other disability domain in the Matrix should be funded with this same fairness and parity.

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"No needs in this area; physical development and general health within normal limits"	Qualifying Threshold: The child has no physical disability or medical condition affecting school life. • Parity Check: Fairly set at 0 points because there are no needs in this area (unlike Col 6 Autism, where Mild/Moderate needs are placed in Row A).	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Mild disability e.g. mild diplegia. Poor fine and/or gross motor control. Independently mobile without aids. May need support with administration of medication."	Qualifying Threshold: Child is independently mobile without walking aids, but has mild physical/motor difficulties or requires staff support to administer medication. • Automatic Full Points: Automatically multiplied by 4 (20 × 100% × 4 = 80 pts) with no FIDS deduction.	80.0 pts (Auto Score 4)	Band 1 (£0 alone; 80/189 pts to B3)
Row C (Moderate) Base = 40	"Moderate disability. Pupil is mobile with the use of walking aids - may require level / supervised access. Needs daily specialised programme for co-ordination skills. Needs daily support with health care regimes. A healthcare plan will be in place."	Qualifying Threshold: Child uses walking aids, requires supervised/level access, a daily motor coordination programme, and daily healthcare support under an Individual Healthcare Plan. • Automatic Full Points: Automatically scores 160 pts (40 × 100% × 4) — just 29 pts short of Band 3 (£1,000) on its own.	160.0 pts (Auto Score 4)	Band 2 (£0 alone; 160/189 pts to B3)
Row D (Severe — Mainstream/ER) Base = 100	"Severe disability. Needs access to wheelchair for movement (independent or adult supported). Needs special seating and/or other equipment. Needs assistive technology and/or support for access to most of the curriculum"	Qualifying Threshold: Child uses a wheelchair (independently or with adult support), requires specialist seating/equipment, and needs assistive technology or adult support to access most of the curriculum. • Stand-Alone Funding Impact: Automatically scores 400.0 pts (100 × 100% × 4), which instantly qualifies for Band 5 (£5,000 top-up) on its own.	400.0 pts (Auto Score 4)	Band 5 (£5,000)
Row E (Profound — Special School) Base = 360	"Profound or progressive condition - life expectancy compromised. Wheelchair dependent and needs assistance for mobility. Non-weight bearing / needs hoist. Needs regular assisting and moving, including a risk assessment. Needs specialist health care and multi-agency response"	Qualifying Threshold: Child has a profound or life-limiting progressive condition, is wheelchair-dependent, non-weight-bearing requiring a hoist, and requires multi-agency specialist healthcare. • Stand-Alone Funding Impact: Automatically scores 1,440.0 pts (360 × 100% × 4), instantly placing the child in Band 11 (£11,000 top-up) from this single column alone.	1,440.0 pts (Auto Score 4)	Band 11 (£11,000)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 2 OF 10 — HEARING IMPAIRMENT [PAGE 4 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Sensory, Physical and Health Needs | Spreadsheet Tab 2 & 3 Header: "Hearing" | Category Weighting: 100% (Full Standard Recognition — 0% Deduction) | Scoring Rule: Automatic Score = 4 (Headed 'Score', No FIDS Filter)

Why Column 2 Is a Fair 100% Benchmark (Objective Clinical Thresholds): Like Physical Disability, Hearing Impairment is weighted at **100%** and receives an **automatic multiplier of 4** (no FIDS rationing filter). Crucially, the descriptors in Rows B, C, D, and E are anchored to clear clinical audiology definitions (Mild, Moderate, Severe, Profound) and specialist Teacher of the Deaf (ToD / STePS) input. Even when radio aids or cochlear implants help the child manage in class, their score is **never** cut by 50%–75% under a FIDS filter.

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"Hearing within normal limits / satisfactory hearing"	Qualifying Threshold: Child has normal / satisfactory hearing with no clinical hearing loss. • Parity Check: Fairly set at 0 points.	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Mild hearing loss (e.g. conductive or unilateral loss). Functioning as mild hearing loss. Can hear without aids"	Qualifying Threshold: Diagnosed mild, conductive, or unilateral (one-sided) hearing loss where the child can hear without hearing aids. • Automatic Full Points: Automatically scores 80.0 pts (20 × 100% × 4).	80.0 pts (Auto Score 4)	Band 1 (£0 alone; 80/189 pts to B3)
Row C (Moderate) Base = 40	"Moderate hearing loss. Functions as moderate hearing loss. May be aided in one or both ears. Uses listening technology and may use radio aids. Will have a link to/be accessing specialist HI team/STePS (ToD)."	Qualifying Threshold: Moderate hearing loss, aided in one or both ears, using listening technology/radio aids, and linked to the specialist Hearing Impairment team / Teacher of the Deaf (ToD). • Automatic Full Points: Automatically scores 160.0 pts (40 × 100% × 4) — compare this to a child with Moderate Autism (Row C) who gets only 19.2 to 76.8 pts.	160.0 pts (Auto Score 4)	Band 2 (£0 alone; 160/189 pts to B3)
Row D (Severe — Mainstream/ER) Base = 100	"Severe hearing loss. Functions as severe hearing loss. Uses listening technology, may use radio aids, to access the curriculum. May use signing. Will need support from teacher of the Deaf (ToD) from STePS (radio aids, sound field system, cochlear implant)"	Qualifying Threshold: Severe hearing loss requiring radio aids, sound field system, or cochlear implant, ToD support, and potentially signing to access the curriculum. • Stand-Alone Funding Impact: Automatically scores 400.0 pts (100 × 100% × 4), guaranteeing Band 5 (£5,000 top-up) on its own.	400.0 pts (Auto Score 4)	Band 5 (£5,000)
Row E (Profound — Special School) Base = 360	"Very limited functional hearing (even with technology) and / or BSL signing as first language requiring a high level of communication support. Needs high levels of Specialist Support including ToD. Those who are multi-sensory impaired"	Qualifying Threshold: Profound deafness with very limited functional hearing even with technology, BSL as first language requiring high-level communication support, or multi-sensory impairment. • Stand-Alone Funding Impact: Automatically scores 1,440.0 pts (360 × 100% × 4), instantly securing Band 11 (£11,000 top-up) .	1,440.0 pts (Auto Score 4)	Band 11 (£11,000)

***Official Placement Divider Banners in Tab 1 (Matrix):** Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."

COLUMN 3 OF 10 — VISION IMPAIRMENT [PAGE 5 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Sensory, Physical and Health Needs | Spreadsheet Tab 2 & 3 Header: "Vision" | Category Weighting: 100% (Full Standard Recognition — 0% Deduction) | Scoring Rule: Automatic Score = 4 (Headed 'Score', No FIDS Filter)

Why Column 3 Is a Fair 100% Benchmark (Objective Clinical Snellen Acuity Thresholds): Vision Impairment is weighted at **100%** and receives an **automatic multiplier of 4** (no FIDS rationing filter). Each row is defined by objective clinical visual acuity measurements (e.g., 6/12-6/18 for Row B, 6/19-6/36 for Row C, 6/36-6/120 for Row D, and <6/120 *Registered Blind* for Row E). There is no subjective panel debate over 'Frequency' or 'Duration'—if the child has the clinical impairment, they receive 100% of the points for that tier.

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"Vision within normal range, including when corrected by glasses"	Qualifying Threshold: Normal vision (including vision corrected to normal range by standard prescription glasses). • Parity Check: Fairly set at 0 points.	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Mild impairment i.e. 6/12 - 6/18. Reads N12 print. Mild bilateral field loss or adapted to monocular vision Independently mobile"	Qualifying Threshold: Visual acuity between 6/12 and 6/18, reads N12 print, mild bilateral field loss or monocular vision, independently mobile. • Automatic Full Points: Automatically scores 80.0 pts (20 × 100% × 4).	80.0 pts (Auto Score 4)	Band 1 (£0 alone; 80/189 pts to B3)
Row C (Moderate) Base = 40	"Moderate impairment Needs some work modified 6/19 - 6/36. Moderate bi-lateral field loss. Independent mobility in familiar areas Some specialist equipment needed - will require support from the VI Team."	Qualifying Threshold: Visual acuity between 6/19 and 6/36, moderate bilateral field loss, needs modified work, specialist equipment, and Visual Impairment (VI) Team support. • Automatic Full Points: Automatically scores 160.0 pts (40 × 100% × 4).	160.0 pts (Auto Score 4)	Band 2 (£0 alone; 160/189 pts to B3)
Row D (Severe — Mainstream/ER) Base = 100	"Severe impairment 6/36 - 6/120 Registered sight impaired (partially sighted). May need short term specialist support for mobility training / independent living skills. Significant level of specialist equipment needed - VI Team/Assistive Tech"	Qualifying Threshold: Visual acuity between 6/36 and 6/120, registered sight impaired (partially sighted), requiring mobility training and significant assistive technology. • Stand-Alone Funding Impact: Automatically scores 400.0 pts (100 × 100% × 4), guaranteeing Band 5 (£5,000 top-up) on its own.	400.0 pts (Auto Score 4)	Band 5 (£5,000)
Row E (Profound — Special School) Base = 360	"Profound impairment Less than 6/120. Registered Blind Alternative methods of text access. Needs on-going specialist support and training for mobility and living skills. Needs high level of specialist equipment"	Qualifying Threshold: Visual acuity worse than 6/120, registered blind, requiring non-visual text access (e.g., Braille/screen readers) and ongoing mobility training. • Stand-Alone Funding Impact: Automatically scores 1,440.0 pts (360 × 100% × 4), instantly securing Band 11 (£11,000 top-up) .	1,440.0 pts (Auto Score 4)	Band 11 (£11,000)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 4 OF 10 — SENSORY NEEDS (SENSORY PROCESSING DISORDER / SPD) [PAGE 6 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Sensory, Physical and Health Needs | Spreadsheet Tab 2 & 3 Header: "Sensory Needs" | Category Weighting: 25% (-75% Reduction vs. 100% Standard Benchmark!) | Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 4 (75% Weighting Cut + Verbatim Copy-Paste Defect): Even though Sensory Needs sits inside the exact same "Sensory, Physical and Health Needs" section of the Matrix as Hearing and Vision, the Council slashed its Category Weighting to just **25%** (one-quarter of the 100% standard) and subjected it to the **1–4 FIDS rationing filter**. Worse still, the Council **copy-pasted the exact same 24-word sentence into both Row C and Row D**—meaning there is zero objective difference between a Moderate (base 40) and Severe (base 100) sensory processing need!

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"No significant needs."	Qualifying Threshold: No significant sensory processing needs. • Score: 0 points.	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Some sensory processing difficulties, for example, sensory seeking or avoiding but not hyper/hypo sensitive."	Qualifying Threshold: Child shows sensory seeking or sensory avoidance behaviours, but is deemed "not hyper/hypo sensitive." • Double Penalty: 25% weight × FIDS 1–4 gives just 5.0 pts per FIDS unit (max 20.0 pts at FIDS 4 vs. 80.0 pts for Row B in Cols 1–3).	FIDS 1: 5.0 FIDS 2: 10.0 FIDS 3: 15.0 FIDS 4: 20.0	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"Sensory processing may have more hyper/hypo sensitive features - for example, strong aversions to smells/touch/sounds and busy environments."	Qualifying Threshold: Hyper- or hypo-sensitivity (e.g., strong aversions to smells, touch, noise, and busy classrooms/corridors). • Copy-Paste Defect (Part 1): This descriptor is 100% identical word-for-word to Row D below, allowing panels to arbitrarily score a Severe sensory need in Row C (max 40 pts) instead of Row D (max 100 pts).	FIDS 1: 10.0 FIDS 2: 20.0 FIDS 3: 30.0 FIDS 4: 40.0	Band 0 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"Sensory processing may have more hyper/hypo sensitive features - for example, strong aversions to smells/touch/sounds and busy environments"	Qualifying Threshold: IDENTICAL COPY-PASTE OF ROW C! The only difference is the missing full stop at the end of the sentence. • Severe Rationing: Even if the panel awards Row D <i>and</i> the maximum FIDS 4, a child with severe SPD gets only 100.0 pts (vs. 400.0 pts in Cols 1–3) — still 89 points short of Band 3 (£1,000)!	FIDS 1: 25.0 FIDS 2: 50.0 FIDS 3: 75.0 FIDS 4: 100.0	Band 0 or 1 (£0 at all FIDS levels!)
Row E (Profound — Special School) Base = 360	"Sensory needs are profound, and impact the young person's ability to stay regulated in the environment that they are in. Considerable reasonable adjustments required to support sensory need within a learning environment."	Qualifying Threshold: Profound sensory needs that prevent the child staying regulated in their environment despite considerable adjustments. • Severe Rationing: At FIDS 1 (90 pts) or FIDS 2 (180 pts), even a Profound (Row E) sensory need fails to reach Band 3 (189 pts = £1,000)!	FIDS 1: 90.0 FIDS 2: 180.0 FIDS 3: 270.0 FIDS 4: 360.0	FIDS 1–2: £0 FIDS 3: £2k (B4) FIDS 4: £5k (B5)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 5 OF 10 — SPEECH AND LANGUAGE [PAGE 7 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Communication and Interaction | Spreadsheet Tab 2 & 3 Header: "Speech and language" | Category Weighting: 48% (-52% Reduction vs. 100% Standard Benchmark!) | Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 5 (52% Weighting Cut + The 'Non-Verbal' Gatekeeping Trap at Row D): Speech and Language is devalued to a **48% Category Weighting** and subjected to the **1–4 FIDS filter**. Crucially, look at the wording jump between Row C and Row D: to qualify for **Row D (Severe)**, the descriptor states the child *"may not yet communicate with words, and needs support in developing alternative communication means."* This structurally locks verbal children with severe receptive, pragmatic, or auditory processing disorders into Row B or Row C (max 38.4 or 76.8 pts).

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"Language communication skills within average levels or above, or slight delay across expressive/receptive/semantic development"	Qualifying Threshold: Average language skills, or a "slight delay" across expressive/receptive/semantic development. • Gatekeeping Note: Children with a "slight delay" are placed in Row A and awarded 0 points .	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Some delay in expressive and/or receptive language or other language development need. Auditory processing needs or literal/inferential comprehension. Mild speech sound disorder"	Qualifying Threshold: Some expressive/receptive language delay, auditory processing needs, literal/inferential comprehension difficulties, or mild speech sound disorder. • Double Penalty: 48% weight × FIDS 1–4 awards only 9.6 pts per FIDS unit (max 38.4 pts at FIDS 4 vs. 80.0 pts standard).	FIDS 1: 9.6 FIDS 2: 19.2 FIDS 3: 28.8 FIDS 4: 38.4	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"Moderate delay in expressive and/or receptive language or other language development need. Auditory processing needs or literal/inferential comprehension that require support in a targeted way."	Qualifying Threshold: Moderate expressive/receptive language delay or auditory processing / comprehension difficulties requiring targeted intervention. • Ceiling for Verbal Pupils: Because Row D specifies non-verbal communication, most verbal neurodivergent children with significant language needs are capped at Row C (max 76.8 pts at FIDS 4).	FIDS 1: 19.2 FIDS 2: 38.4 FIDS 3: 57.6 FIDS 4: 76.8	Band 0 or 1 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"Severe language and/or speech sound disorder. The young person may not yet communicate with words, and needs support in developing alternative communication means. They will be having regular input with professionals or support beyond what should be ordinarily available in School."	Qualifying Threshold: Severe disorder where the pupil <i>"may not yet communicate with words"</i> , needs alternative communication (AAC/PECS), and has regular SALT input. • Severe Rationing: Even a non-verbal child at Row D gets only 48 to 144 pts (£0 funding) at FIDS 1–3, and at FIDS 4 (192.0 pts) barely scrapes Band 3 (£1,000) by 3 points!	FIDS 1: 48.0 FIDS 2: 96.0 FIDS 3: 144.0 FIDS 4: 192.0	FIDS 1–3: £0 FIDS 4: £1k (B3)
Row E (Profound — Special School) Base = 360	"Cannot express or understand language, and needs support to use alternative means of communication or to make their needs known."	Qualifying Threshold: Complete inability to express or understand language. • Rationing Impact: Even a child who cannot express or understand any language at Row E gets £0 if scored at FIDS 1 (172.8 pts < 189 pts), and at FIDS 4 gets 691.2 pts (less than half of the 1,440 pts standard).	FIDS 1: 172.8 FIDS 2: 345.6 FIDS 3: 518.4 FIDS 4: 691.2	FIDS 1: £0 (B2) FIDS 2: £5k (B5) FIDS 3: £6k (B6) FIDS 4: £7k (B7)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 6 OF 10 — SOCIAL AND COMMUNICATION DIFFICULTIES (AUTISM) [PAGE 8 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Communication and Interaction | Spreadsheet Tab 2 & 3 Header: "Social and communication difficulties" | Category Weighting: 48% (-52% Reduction vs. 100% Standard Benchmark!) |

Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 6 (The Autism Gatekeeping Column): This is the primary column for Autism, yet its Category Weighting is cut by more than half to **48%** and subjected to the **1–4 FIDS filter**. Worse still, Column 6 is the **only column in the entire Matrix** where **Row A (0 points)** is explicitly defined as "*Mild / Moderate needs*" (in every other column, Row A is "*No needs*" or "*No significant needs*"). That means an autistic child needing social interventions is pushed down a row before scoring even begins!

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"Mild / Moderate needs, for example, there may be a need for support such as circle of friends or comic strip communications to support development as a short term measure."	THE ROW A GATEKEEPING TRAP: Unlike every other column in the Matrix (where Mild needs = Row B and Moderate needs = Row C), Column 6 places " Mild / Moderate needs " (such as Circle of Friends or Comic Strip Conversations) into Row A — awarding 0.0 points!	0.0 pts (Despite Mild/Mod Autism needs!)	Band 0 (£0)
Row B (Mild) Base = 20	"May have indicators of neurodiversity, however, is able to manage with limited additional support and adaptation the demands of the learning environment. Reasonable Adjustments are in place and appropriate to environment and policies. (Visual timetables, Communication aids, notice boards, concrete resources etc)"	Qualifying Threshold: Neurodivergent child managing with visual timetables, communication aids, concrete resources, and limited additional support. • Double Penalty: Because the child is "able to manage" with adjustments, they are placed in Row B and scored FIDS 1 or 2 — yielding just 9.6 to 19.2 pts (max 38.4 pts at FIDS 4).	FIDS 1: 9.6 FIDS 2: 19.2 FIDS 3: 28.8 FIDS 4: 38.4	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"Young person may be neurodiverse, along with other associated areas of need (learning, attention, behaviour e.g. pre-occupation, unusual responses, stress) and requires additional support / supervised interventions in school. They may have some sensory processing needs or show some Sensory integration needs."	Qualifying Threshold: Neurodivergent pupil with co-occurring learning, attention, stress/behaviour, and sensory needs requiring additional support and supervised interventions. • Rationing Impact: Even at FIDS 4, Row C awards only 76.8 pts (and at FIDS 2 gives just 38.4 pts) — nowhere near the 189 pts needed for Band 3 (£1,000).	FIDS 1: 19.2 FIDS 2: 38.4 FIDS 3: 57.6 FIDS 4: 76.8	Band 0 or 1 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"As above, but with a greater need for support for example, including for example, and identified trusted member of staff with a greater need for adaptations, specialist teaching strategies (EEF) for example, a transitions plan or with social stories to support during the school day. They may not be able to express in a regulated way when they are finding tasks challenging."	Qualifying Threshold: Severe autism needs requiring an identified trusted member of staff , transitions plan, social stories throughout the school day, and dysregulation when tasks are challenging. • Rationing Impact: Even though this descriptor explicitly requires a dedicated trusted staff member, FIDS 1–3 yields 48 to 144 pts (£0 funding) , and FIDS 4 yields 192 pts (£1,000) — which cannot pay for 1 hour/day of TA support!	FIDS 1: 48.0 FIDS 2: 96.0 FIDS 3: 144.0 FIDS 4: 192.0	FIDS 1–3: £0 FIDS 4: £1k (B3)
Row E (Profound — Special School) Base = 360	"Profound impact on ability on the young persons to manage the environment in which they are in on a day to day basis."	Qualifying Threshold: Profound daily inability to manage the school environment. • Vague & Rationed: Unlike the clinical criteria in Cols 1–3, this single-sentence descriptor is completely undefined, and its max score (691.2 pts) is less than half the 1,440 pts standard.	FIDS 1: 172.8 FIDS 2: 345.6 FIDS 3: 518.4 FIDS 4: 691.2	FIDS 1: £0 (B2) FIDS 2: £5k (B5) FIDS 3: £6k (B6) FIDS 4: £7k (B7)

***Official Placement Divider Banners in Tab 1 (Matrix):** Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."

COLUMN 7 OF 10 — EMOTIONAL WELLBEING AND MENTAL HEALTH [PAGE 9 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Social, Emotional and Mental Health (SEMH) | Spreadsheet Tab 2 & 3 Header: "Emotional wellbeing and Mental Health" | Category Weighting: 75% (-25% Reduction vs. 100% Standard Benchmark) | Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 7 (25% Weighting Cut + High Clinical / CAMHS Thresholds): Emotional Wellbeing and Mental Health is weighted at **75%** and subjected to the **1–4 FIDS filter**. To reach **Row D (Severe)**, a child must present with inability to self-regulate or co-regulate, complex mental health conditions, self-harming behaviours, or Emotionally Based School Non-Attendance (EBSNA) with external health agency involvement. To reach **Row E**, the descriptor cites medication or **Tier 4 CAMHS** (inpatient/intensive crisis psychiatric care).

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"No significant needs in this area"	Qualifying Threshold: No significant emotional wellbeing or mental health needs. • Score: 0 points.	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"The young person may not be able to communicate their needs in a ways that are expected or ACES/Trauma need which requires reasonable adjustments to be made. Pastoral support in place with a personalised support plan to address the young persons needs."	Qualifying Threshold: Difficulty communicating emotional needs or Adverse Childhood Experiences (ACEs)/trauma requiring pastoral support and a personalised support plan. • Points: 15.0 pts per FIDS unit (15.0 to 60.0 pts).	FIDS 1: 15.0 FIDS 2: 30.0 FIDS 3: 45.0 FIDS 4: 60.0	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"The young person has difficulties communicating their needs in a ways that are expected. They may be withdrawn or disengaged which results in difficulties communicating their wants and needs. They may have a named mental health condition or trauma that impacts on their learning. Reasonable adjustments must be made, once explored more specialist support may be required."	Qualifying Threshold: Withdrawn or disengaged pupil with a named mental health condition or trauma impacting learning, requiring specialist support. • Rationing Impact: Even with a diagnosed mental health condition, Row C yields only 30 to 120 pts (£0 stand-alone funding).	FIDS 1: 30.0 FIDS 2: 60.0 FIDS 3: 90.0 FIDS 4: 120.0	Band 0 or 1 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"As above +, The young person may not have developed self regulation or be able to co-regulate, or may have experienced complex mental health needs/be experiencing them - for example, a named condition that requires support from specialist professionals. Self harming behaviours may be present. They may not be able to manage their own needs without adult facilitation or therapeutic input. EBSNA/High Level School disengagement. appropriate Health agencies involved to support young person's needs (Compass / Kooth / Chat health)"	Qualifying Threshold: Unable to self-regulate or co-regulate, complex mental health condition, self-harming behaviours , constant adult facilitation required, or EBSNA with health agency involvement. • Rationing Impact: Despite requiring constant adult facilitation to prevent self-harm/dysregulation, FIDS 1 or 2 awards only 75 or 150 pts (£0 funding) ; FIDS 3 awards 225 pts (£1,000) ; FIDS 4 awards 300 pts (£2,000) .	FIDS 1: 75.0 FIDS 2: 150.0 FIDS 3: 225.0 FIDS 4: 300.0	FIDS 1–2: £0 FIDS 3: £1k (B3) FIDS 4: £2k (B4)
Row E (Profound — Special School) Base = 360	"As above. They may not be able to manage their own needs without adult facilitation or therapeutic input. They may require medication or other support not available in School, for example, Tier 4 CAMHS."	Qualifying Threshold: Requires constant adult facilitation/therapy and medication or support not available in school, such as Tier 4 CAMHS (inpatient psychiatric level). • Points: 270.0 to 1,080.0 pts (vs. 1,440.0 pts standard).	FIDS 1: 270.0 FIDS 2: 540.0 FIDS 3: 810.0 FIDS 4: 1,080.0	FIDS 1: £2k (B4) FIDS 2: £6k (B6) FIDS 3: £7k (B7) FIDS 4: £9k (B9)

***Official Placement Divider Banners in Tab 1 (Matrix):** Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."

Forensic Audit of Column 8 (The 'Social behaviour NOT SEND' Legal Trap): While the Council removed the words *"NOT SEND"* from the public-facing header on Tab 1 (*Matrix*), **Tab 2 (Cell AE2) and Tab 3 (Cell AE2) are still explicitly titled *"Social behaviour NOT SEND"***! Furthermore, look at Row D (Cell P9): it mixes clinical traits of Autism, ADHD, and PDA/Trauma (*"Demonstrates hyper vigilance"* and *"Limited understanding of personal risk or danger"*) right next to *"aggression with no defined needs/causation"*—creating a dangerous trap where disability-driven distress is misclassified as non-SEND bad behaviour.

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"No significant needs in this area"	Qualifying Threshold: No significant social behaviour needs. • Score: 0 points.	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"The young person may present with peer interaction issues, or not be able to sustain adult relationships in an appropriate way. This may expand to lack of social boundaries where personal property and premises are concerned. They may seek attention and validation in a way that is not felt to be appropriate, or be unable to wait for feedback. This will be low level, and may be consistent."	Qualifying Threshold: Peer/adult interaction difficulties, lack of social boundaries around property, seeking validation, or inability to wait for feedback (common ADHD/Autism traits). • Points: 15.0 pts per FIDS unit (15.0 to 60.0 pts).	FIDS 1: 15.0 FIDS 2: 30.0 FIDS 3: 45.0 FIDS 4: 60.0	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"The young person may present with peer interaction issues, or not be able to sustain adult relationships in an appropriate way. This will include a lack of social boundaries where personal property and premises are concerned. They seek attention and validation in a way that is persistent and significantly impacts the learning environment. This will be high level, and frequent."	Qualifying Threshold: High-level, frequent peer/adult interaction issues and lack of social boundaries that significantly impact the learning environment. • FIDS Contradiction: Even though the descriptor itself says <i>"This will be high level, and frequent"</i> , panel officers can still apply a FIDS 1 or 2 multiplier (30 or 60 pts)!	FIDS 1: 30.0 FIDS 2: 60.0 FIDS 3: 90.0 FIDS 4: 120.0	Band 0 or 1 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"The young person may present with frequent peer and adult interaction issues, or not be able to sustain adult relationships in an appropriate way. Demonstrates hyper vigilance. They will lack social boundaries where personal property and premises are concerned, and this will extend to peer on peer or adult focused aggression with no defined needs/causation. Limited understanding of personal risk or danger."	Qualifying Threshold & Legal Trap: Combines clinical neurodivergent safety needs ("Demonstrates hyper vigilance" and "Limited understanding of personal risk or danger") with "aggression with no defined needs/causation" under a column titled <i>"Social behaviour NOT SEND"</i> in Tabs 2 & 3. • Points: 75.0 to 300.0 pts (max Band 4 = £2,000).	FIDS 1: 75.0 FIDS 2: 150.0 FIDS 3: 225.0 FIDS 4: 300.0	FIDS 1–2: £0 FIDS 3: £1k (B3) FIDS 4: £2k (B4)
Row E (Profound — Special School) Base = 360	"As above, however with increased FIDS - Persistent. Persistently intimidates and readily resorts to physical aggression. Unable to self-regulate. No sense of personal risk or danger"	Qualifying Threshold: Unable to self-regulate, no sense of personal risk or danger (requiring constant 1:1 proximity supervision), and persistent physical aggression. • Built-In FIDS Redundancy: Notice Row E explicitly says <i>"with increased FIDS - Persistent"</i> , yet Tabs 2 & 3 still subject Row E to a 1–4 FIDS multiplier!	FIDS 1: 270.0 FIDS 2: 540.0 FIDS 3: 810.0 FIDS 4: 1,080.0	FIDS 1: £2k (B4) FIDS 2: £6k (B6) FIDS 3: £7k (B7) FIDS 4: £9k (B9)

***Official Placement Divider Banners in Tab 1 (Matrix):** Between Row C and Row D, the spreadsheet states: *"Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base."* Between Row D and Row E, it states: *"Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 9 OF 10 — LEARNING READINESS [PAGE 11 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Cognition and Learning | Spreadsheet Tab 2 & 3 Header: "Learning Readiness" | Category Weighting: 48% (-52% Reduction vs. 100% Standard Benchmark!) | Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 9 (How 'Twice-Exceptional' / Cognitively Able Neurodivergent Pupils Are Locked Out): Learning Readiness is weighted at **48%** (-52% cut) and subjected to the **1–4 FIDS filter**. Crucially, read the descriptors for Rows B, C, D, and E: they **all** contain the descriptions of ADHD/Autistic executive dysfunction ("*distracted from task*", "*inattentive to staff*", "*poor organisation skills*", "*challenges across multiple areas of executive functioning*")—**but every single one of Rows B, C, D, and E begins with a mandatory requirement that the child "Presents with a learning delay; shows difficulty with conceptual understanding"**, while Row A (0 pts) is defined as "*Working at age related expectations*!" This structurally locks out cognitively able autistic/ADHD children.

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"No significant needs in this area/Working at age related expectations"	THE 'AGE RELATED EXPECTATIONS' LOCKOUT TRAP: Any child who is academically " Working at age related expectations " (even if they have severe ADHD/Autism/PDA executive dysfunction and cannot initiate or complete tasks without 1:1 adult prompting) is automatically locked into Row A = 0.0 points!	0.0 pts (Locks out all pupils at Age Related Exp!)	Band 0 (£0)
Row B (Mild) Base = 20	"Presents with some learning delay; shows some difficulty with conceptual understanding in line with developmental needs against chronological age. Sometimes distracted from task. Sometimes inattentive to staff/does not follow adult direction. Some poor organisation skills. Sometimes doesn't work well in a group as a consequence of known needs or unknown needs, and requires reasonable adjustments to be made, for example, time out."	Qualifying Threshold: Requires " <i>some learning delay</i> " AND " <i>difficulty with conceptual understanding</i> " alongside distractibility, inattention, and poor organisation. • Points: 9.6 pts per FIDS unit (9.6 to 38.4 pts).	FIDS 1: 9.6 FIDS 2: 19.2 FIDS 3: 28.8 FIDS 4: 38.4	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"Presents with a greater learning delay; shows some difficulty with conceptual understanding in line with developmental needs against chronological age which requires greater adaptation and differentiation of learning tasks as someone of the same age. Often distracted from task. Sometimes inattentive to staff/does not understand adult direction given without significant scaffolding of idea/concept. Has challenges across multiple areas of executive functioning. Sometimes doesn't work well in a group as a consequence of known needs or unknown needs, and requires reasonable adjustments to be made as well as requiring structure around all learning routines."	Qualifying Threshold: Explicitly mentions " <i>challenges across multiple areas of executive functioning</i> " and needing " <i>structure around all learning routines</i> " — but ties it to " <i>Presents with a greater learning delay</i> "! • Points: 19.2 to 76.8 pts (£0 stand-alone funding).	FIDS 1: 19.2 FIDS 2: 38.4 FIDS 3: 57.6 FIDS 4: 76.8	Band 0 or 1 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	"Presents with a significant delay in line with developmental needs against chronological age which requires significant adaptation and differentiation of learning tasks as someone of the same age. Frequently distracted from task. Sometimes inattentive to staff/does not understand adult direction given without significant scaffolding of idea/concept. Has challenges across multiple areas of executive functioning. Sometimes doesn't work well in a group as a consequence of known needs or unknown needs, and requires reasonable adjustments to be made as well as requiring structured specialist teaching strategies."	Qualifying Threshold: Requires a " <i>significant delay</i> " against chronological age alongside executive functioning challenges. • Rationing Impact: Even a child with a severe learning delay at Row D gets £0 at FIDS 1–3 (48 to 144 pts), and at FIDS 4 gets only 192.0 pts (Band 3 = £1,000 vs. £5,000 for Row D in Cols 1–3).	FIDS 1: 48.0 FIDS 2: 96.0 FIDS 3: 144.0 FIDS 4: 192.0	FIDS 1–3: £0 FIDS 4: £1k (B3)
Row E (Profound — Special School) Base = 360	"Presents with a severe delay in line with developmental needs against chronological age which requires significant adaptation and differentiation of learning tasks as someone of the same age. Requires bespoke curriculum pathways, or disapplication of NC and experiential learning activities. Young person is not ready to learn in a structured or formal way, and does not understand adult direction. Without significant scaffolding of ideas and concepts."	Qualifying Threshold: Severe cognitive delay requiring disapplication of the National Curriculum (NC) and experiential learning. • Points: 172.8 to 691.2 pts (less than half of the 1,440.0 pts standard).	FIDS 1: 172.8 FIDS 2: 345.6 FIDS 3: 518.4 FIDS 4: 691.2	FIDS 1: £0 (B2) FIDS 2: £5k (B5) FIDS 3: £6k (B6) FIDS 4: £7k (B7)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*

COLUMN 10 OF 10 — SPECIFIC LEARNING DIFFICULTIES (DYSLEXIA, DYSCALCULIA, DYSGRAPHIA, DCD / DYSPRAXIA) [PAGE 12 OF 12: DOMAIN DEEP-DIVE & VERBATIM THRESHOLDS]

SEND Code of Practice Area: Cognition and Learning | Spreadsheet Tab 2 & 3 Header: "Specific Learning Difficulties" | Category Weighting: 8% (-92% Reduction vs. 100% Standard Benchmark + Blank Rows D & E) | Scoring Rule: Subjected to 1–4 'FIDS' Rationing Filter

Forensic Audit of Column 10 (The 92% Penalty & Completely Blank Rows D & E): Specific Learning Difficulties (Dyslexia, Dyscalculia, Dysgraphia, Developmental Coordination Disorder/Dyspraxia, and even Acquired Brain Injury in Row C) are subjected to the most extreme mathematical erasure in the entire Matrix. First, the Council slashed the Category Weighting to just **8%** (a **92% reduction** compared to the 100% standard). Second, the Council left **Row D (Severe) and Row E (Profound) completely blank** on Tab 1 and hardcoded them as **0 points** in Tab 3! As a result, the maximum possible single-row score for the most severe SpLD or Acquired Brain Injury in Derby is just **12.8 points**—less than **one-fourteenth** of the 189 points required to reach Band 3 (£1,000)!

Row Level & Base Multiplier	Verbatim Matrix Descriptor (Exact wording from Tab 1: Matrix of banding-matrix.xlsx)	Plain-English Qualifying Threshold & Parity / Gatekeeping Analysis	Points Awarded (FIDS 1 / 2 / 3 / 4)	Stand-Alone Band & E3 Top-Up (£)
Row A (No Score) Base = 0	"Literacy and numeracy within broad average levels and in line with expectation ."	Qualifying Threshold: Literacy and numeracy broadly in line with expectations. • Gatekeeping Trap: Twice-exceptional children with severe Dysgraphia or Dyspraxia (DCD) whose reading/numeracy is average can be pushed into Row A (0 pts).	0.0 pts	Band 0 (£0)
Row B (Mild) Base = 20	"Presents with needs aligned with the SpLDs, for example, Dyslexia, Dyscalculia, Dysgraphia or DCD"	Qualifying Threshold: Child presents with Dyslexia, Dyscalculia, Dysgraphia, or DCD/Dyspraxia. • 92% Weighting Erasure: Because the weight is 8%, 1 FIDS unit equals just 1.6 points (20 × 8% × 1). Even at FIDS 4, Row B awards only 6.4 points (compared to 80.0 pts in Cols 1–3).	FIDS 1: 1.6 FIDS 2: 3.2 FIDS 3: 4.8 FIDS 4: 6.4	Band 0 (£0 at all FIDS levels)
Row C (Moderate) Base = 40	"In conjunction with 'The Derby Way' - Ensure that specialist teaching strategies and reasonable adjustments are applied. Acquired Brain injury"	Qualifying Threshold: Vague reference to "The Derby Way" specialist teaching strategies, plus " Acquired Brain injury " tacked onto the end. • Absolute Ceiling for SpLD & Brain Injury: Even at FIDS 4, Row C awards just 12.8 points (or 19.2 pts if B+C are summed as in the calibration rows) — less than 1/10th of Band 3 (189 pts)!	FIDS 1: 3.2 FIDS 2: 6.4 FIDS 3: 9.6 FIDS 4: 12.8	Band 0 (£0 at all FIDS levels)
Row D (Severe — Mainstream/ER) Base = 100	[CELL S9 IS COMPLETELY BLANK ON TAB 1 (MATRIX) AND HARDCODED AS 0 POINTS IN TAB 3 (BAND_CALCULATOR)]	STRUCTURAL ERASURE OF SEVERE SpLD: The Council left Row D completely empty. Under Derby's Matrix, a child cannot be scored as having 'Severe' Dyslexia, Dyscalculia, Dysgraphia, DCD, or Acquired Brain Injury — it returns 0.0 points .	0.0 pts (CELL BLANK!)	Band 0 (£0)
Row E (Profound — Special School) Base = 360	[CELL S11 IS COMPLETELY BLANK ON TAB 1 (MATRIX) AND HARDCODED AS 0 POINTS IN TAB 3 (BAND_CALCULATOR)]	STRUCTURAL ERASURE OF PROFOUND SpLD: The Council also left Row E completely empty. Even in the Council's own 'Max point D' and 'Max point E' calibration rows (Tab 3 Rows 9–10), Column 10 outputs 0 points for D and E.	0.0 pts (CELL BLANK!)	Band 0 (£0)

**Official Placement Divider Banners in Tab 1 (Matrix): Between Row C and Row D, the spreadsheet states: "Children and young people with multiple needs described below, whilst mainstream school is appropriate, may benefit from the support and expertise of an ER/Base." Between Row D and Row E, it states: "Children and young people with multiple needs described below may benefit from more specialist educational provision, for example, an ER/Base or maintained special school."*