

Derby City Council – Response
ID Reference FOI750726532
Date 11/03/2026

Clarification:

For the purposes of my FOI, any previous reference to "VSEND", "IMPOWER", or "Profiling Tool" must now be taken to refer to the following, regardless of the software vendor:

- **a) The "High Needs Matrix"** (referenced in public Schools Forum papers, e.g., Dec 2024/25, as "**Appendix 4a**" or "Matrix Trial").
- **b) The "Banding Framework"** (referenced in public Schools Forum papers, e.g., Dec 2024/25, as "**Appendix 4b**").
- **c) The decision-support functionality** within the **LiquidLogic Children’s System (LCS)**, the **Early Help Module (EHM)**, or the **ContrOCC** finance system.

Regarding the High Needs Matrix and Banding Framework, I request:

- **The "Descriptors" (Current Version of Appendix 4a):** I am aware that a version of the High Needs Matrix was published to the Schools Forum as "Appendix 4a". I request the **current, operational version** of these descriptors used by officers today. Specifically, I require the unredacted text for the "Social Behaviour (NOT SEND)" criteria.
- **The "Conversion Logic" (Current Version of Appendix 4b):** I request the **current, operational version** of the "Banding Framework" (previously "Appendix 4b"). Specifically, I require the lookup table, formula, or document that correlates a "Total Matrix Score" to a monetary Funding Band.
- **Process Maps & Workflows:** The internal flowcharts or "Business Process Maps" that describe the step-by-step process a case officer must follow when determining a High Needs Band, including any steps requiring "Panel Approval" or "Management Override."
- **Panel Terms of Reference:** The "Terms of Reference" or "Operational Guidance" provided to the decision-making panel (e.g., the High Needs Funding Panel) that instructs them on how to apply the Matrix scores to funding decisions.
- **User Guidance:** Any "Practice Guidance," "Standard Operating Procedures," or "Tooltips" provided to officers on how to input data into the LiquidLogic/ContrOCC High Needs forms.

Information Requested	Response
Under the Freedom of Information Act 2000, I request the following recorded information regarding the Council’s use of the High Needs Matrix and its application in statutory Special Educational Needs (SEND) decision-making.	



<p>1. Operational Documentation (The "Rulebook")</p> <p>Please provide copies of the current operational guidance provided to schools, SENCos, and Local Authority officers regarding the use of the High Needs Matrix tool. Specifically, I request:</p> <ul style="list-style-type: none"> • a) The User Guide / Technical Manual: The full instruction manual provided to users of the software. • b) The Full List of Descriptors: A complete list of the specific questions, statements, or "descriptors" that users must select to generate a child's profile (e.g., the specific text options regarding communication, independence, and emotional regulation). • c) The Scoring Criteria: The logic or weighting matrix that explains how these user inputs are calculated to produce the 1-10 "readiness" or "need" scores displayed on the resulting radar charts. 	<p>1. See attached documentation</p> <p>This is an indicative resource allocation system, therefore is based on individual child needs.</p> <p>a) See user guide</p> <p>b) Please see attached.</p> <p>c) Section 31(3) Law Enforcement Exemption</p> <p>We neither confirm nor deny we hold this information - please see the IT security/cyber security guidance published on our website at https://derby.gov.uk/cyber-foi/ for more information about non-disclosure reasons.</p>
<p>2. Decision-Making Guidance</p> <p>Please provide any written policy, internal memo, or guidance document distributed to SEND Panels or Casework Officers that outlines how High Needs Matrix data is used in statutory decisions. I specifically request records that answer:</p>	<p>The Matrix does not make decisions on statutory process.</p>

<ul style="list-style-type: none"> a) Is there guidance stating that a specific High Needs Matrix score or "shape" is required (or recommended) before an EHC Needs Assessment is agreed? 	
<ul style="list-style-type: none"> b) Is there guidance instructing officers to refuse statutory assessment if a school has rated their own confidence/skills as "High" within the tool, regardless of the child's specific needs? 	No.
<p>3. Impact Assessments</p> <p>Please provide copies of:</p> <ul style="list-style-type: none"> a) The Data Protection Impact Assessment (DPIA): Specifically the section covering the processing of special category data (health/disability) of minors via this tool. 	Information not held.
<ul style="list-style-type: none"> b) The Equality Impact Assessment (EIA): Specifically regarding how the tool accounts for "spiky profiles" (e.g., Autistic children with high verbal ability but high adaptive needs) to ensure they are not systematically disadvantaged by the scoring algorithm. 	Information not held
<p>4. Commercial Relationship</p> <p>Please provide the total value of payments made to IMPOWER Consulting Ltd (or related entities) for the provision of High Needs Matrix and the "Delivering Better Value" (DBV) diagnostic work</p>	IMPOWER did not contribute towards the development of the Matrix and Derby City Council did not fall into the DBV programme

between 2023 and the present date.	
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