



ISLINGTON

Alternative Provision

DRAFT REPORT OF THE CHILDREN'S SERVICES SCRUTINY COMMITTEE



**London Borough of Islington
June 2016**

EXECUTIVE SUMMARY

Alternative Provision

Aims

- To identify how we can reduce the numbers of children on alternative provision;
- To identify how we can ensure that provision is of the highest quality;
- To make recommendations to further improve the outcomes, attendance, and accountability for those in alternative provision;
- To identify how schools and academies are ensuring the best possible outcomes for the most vulnerable children, including their emotional well-being, and make recommendations about how best practice can be in place in all schools and Academies;
- To evaluate the quality, standards and value for money of alternative provision providers, and the range of provision;
- To identify how early intervention and 'Think Family' approaches can be mainstreamed once the pump priming funding is no longer available.

Evidence

The review ran from September 2015 until May 2016 and evidence was received from a variety of sources:

1. Presentations from council officers

Gabby Grodentz, Head of Alternative Provision
Anthony Doudle, Head of School Improvement (Primary)
Kin Lawson, Operational Manager (Children in Need Provider Services)

2. Documentary evidence

Introductory Report
Islington Council Alternative Provision Brochure 2015-16
Ofsted – Alternative Provision: A report on the findings from the first year of a three-year survey
Department for Education – Alternative Provision: Statutory guidance for local authorities
Charlie Taylor – Improving Alternative Provision
Inclusion Trust – The alternative should not be inferior: what now for 'pushed out' learners?
North London Children's Efficiency Programme – Quality Framework for Alternative Provision
Details of AP and IFIT partnership pilot project
Briefing note: Referrals and attendance (statistics by school, reasons for referrals, case studies)
Briefing note: The role of schools (responsibilities, in-school support and referral processes)
Briefing note: Attainment and progression / delivering alternative provision (AP cohort demographics, breakdown of attendance and attainment, destinations post-16)

3. Information from witnesses

Anna Cain, The Boxing Academy (AP provider)
Rebekah Westgate, BSix College (AP provider)
Sarah Bealey, Elizabeth Garrett Anderson School
Julie Chambers, Highbury Fields School
Tom Mannion, St Aloysius' College
Nigel Smith, New River College
John d'Abbro OBE, New Rush Hall Group (AP provider in LB Redbridge)

4. Scrutiny visits

Council offices – discussion with the council's Alternative Provision service staff
Alternative Provision settings – The Boxing Academy and City and Islington College

Main Findings

The term 'Alternative Provision' refers to educational settings outside of mainstream school, suitable for pupils who are unable to remain in mainstream education due to their behaviour, illness or other reasons. Although the national definition of alternative provision encompasses provision for excluded pupils (i.e. pupil referral units), the focus of the committee's review was narrower, with an emphasis on the provision used as a last resort for pupils who are at risk of exclusion. Islington has a significant number of pupils referred to such provision, varying between 150 and 200 pupils over the past three years. The impetus for reviewing alternative provision was that outcomes for these pupils are generally unsatisfactory compared to their peers.

Alternative Provision in Islington is coordinated by the council. This is not a statutory requirement; however the council has opted to provide a service in order to establish a clear and standardised local framework in which pupils are referred to a quality-assessed provider, suitable for their needs, with strong monitoring arrangements in place.

One aim of the review was to identify how the numbers of children on alternative provision could be reduced. Children who spend a significant amount of time outside of mainstream school are known to have reduced life chances; and given the comparatively poor outcomes of alternative provision pupils the council had already identified that reducing the number of children in alternative provision was vital to improving outcomes.

The Committee concluded that there are two main methods to reducing the number of pupils in alternative provision; and considered that a combination of the two was required in order to be effective. The first is that numbers be reduced by working to decrease the demand, or the need, for alternative provision. This may be achieved through providing additional support to pupils at an earlier stage, as detailed elsewhere in this report. However, the witness evidence received suggested that some schools were more ready than others to refer pupils to alternative provision, particularly when it was thought that they would receive greater benefit from vocational education, sometimes accommodating requests of the pupil and their parents.

The Committee does not consider alternative provision to be an acceptable route into vocational education and would suggest that attaining GCSEs in mainstream school before commencing vocational studies would likely lead to better outcomes. However, the use of alternative provision in this way does suggest that there is currently an unmet demand for vocational qualifications to be provided within, or alongside, mainstream education. Although the widespread availability of vocational qualifications post-16 is recognised, **the committee recommends that the council review the options and pathways available for pupils wanting to study vocational qualifications at Key Stage 4, to ensure that the demand for vocational education does not contribute towards the need for alternative provision.**

The other means by which to reduce the number of pupils in alternative provision is to strengthen the referral system. It was suggested that a more rigorous referral mechanism could offer an increased level of challenge and help to deter some referrals. The Committee considered that establishing a formal panel process, through which schools would be required to present a robust case supported by evidence, would be the best approach. Crucially, the Committee concluded that schools should be active participants in this panel process, with senior school representatives on the panel to provide peer review to other schools. It is thought that it may help to establish a best-practice consensus among schools as to when it is appropriate to refer to alternative provision.

It is therefore recommended that the alternative provision referral process be strengthened in order to increase the accountability of schools and potentially reduce the number of pupils referred. It is recommended that a formal referral panel be established to consider applications for referral, the membership of which should include senior school

representatives and relevant council officers. This panel should have the authority to approve or decline applications and make recommendations associated with the child's education where appropriate.

It is also recommended that guidance be produced to support schools in making applications to the referral panel, and to assist the referral panel in decision-making. When considering a referral the panel should consider factors such as the needs of the pupil identified via assessment, the support available to the pupil inside and outside of school, the pupil's long term aspirations, attainment levels and the wishes of the pupil.

The Committee was keen to ensure that alternative provision was of the highest quality. Of the 15 providers used by Islington, 11 had received full quality assurance visits in the last two years. Of those 11, six were graded as Good and five were graded as Requires Improvement. Although some providers required improvement, the Committee was satisfied with the quality assurance framework and procedures in place. However, the Committee did consider wider issues relating to the qualifications on offer, aspirations for pupils and additional support available, and suggested that some improvements could be made in this area.

Many alternative provision providers offer vocational qualifications as, in general, these are best suited to their cohort. Some providers offer GCSEs including English and Maths; however this is not true in all cases, with some offering 'functional skills' qualifications as an alternative. The Committee had a number of discussions on the value of qualifications such as functional skills. Although it was recognised that alternative provision pupils are often less academically able than the mainstream cohort, the Committee considered that providers should be offering a challenging curriculum to their pupils in order to best prepare them for the future. There was a suggestion that some providers excessively focused on pupil expectations as opposed to aspirations and this could be to the detriment of some pupils. Some pupils in alternative provision are capable of sitting GCSEs and the Committee thought it to be a disservice to not allow them to study these qualifications if they want to, especially as functional skills are generally not as valued by colleges and employers. The Committee recommended that **all pupils should have the opportunity to study GCSEs and should be encouraged and supported to do so. The council should aspire for all pupils to achieve at least a grade C in GCSE English and Maths**, or the equivalent benchmark grade following the introduction of the numerical grading system in 2017.

In terms of additional support services, the Committee found that the resources of providers to deliver employment and careers support varies considerably. Some providers have dedicated careers services, whereas other smaller providers do not. The Committee concluded that the council could assist in this area by offering additional support to providers who do not have substantial resources to provide careers advice, as required. It is recommended that **the council should review its post-16 employment and skills outreach support offer to alternative provision pupils. The level of advisory support offered by alternative provision providers varies and a minimum offer should be agreed to ensure the best outcomes for pupils.**

The Committee reviewed a range of evidence related to pupil outcomes and considered how these could be improved. The Committee considered the variation in outcomes and suggested that while alternative provision can be very effective in turning around pupils disengaged from mainstream education, the needs of some pupils are so great that additional support is required in order for alternative provision to be effective. The Committee recommends that, **as alternative provision pupils tend to have a higher level of need and vulnerabilities, the council should review the SEN and CAMHS support available to alternative provision pupils and consider increasing the level of support if required.**

The providers interviewed suggested that some alternative provision pupils have undiagnosed special educational needs and therefore the true level of need is greater than the number of SEN pupils known to the alternative provision service. The Committee recommends that **to ensure that**

the educational and other needs of pupils are identified and that they have access to appropriate support, a standardised assessment framework be introduced for those pupils proposed to be referred to alternative provision. Such assessments should be carried out by schools before pupils are referred to alternative provision.

The Committee also considered that outcomes could be improved by strengthening information sharing between services. It was noted that a number of pupils were receiving family support from either statutory or non-statutory services. The alternative provision team was provided with the details of social workers allocated to pupils, however suggested that a more regular supply of information would assist with monitoring pupil process. The alternative provision team had sought to develop stronger relationships with social care, however commented that this can be difficult due to a particularly high turnover of staff. It is recommended that **the council should seek to further develop information sharing systems between the alternative provision service and other relevant areas of the council to ensure that the best interests of children are secured.**

The attendance of alternative provision pupils is a significant problem and the committee considered the reasons for this and the work underway to raise attendance. Over 60% of alternative provision pupils have an attendance rate of less than 95%, the government benchmark for attendance, and more than 50% are persistent absentees. Many pupils have poor attendance records prior to referral, with poor attendance being a factor in around a quarter of referrals.

To improve attendance the service appointed an education welfare officer in June 2014 to work with providers, pupils and their families on attendance. Although it is true that the attendance of many alternative provision pupils is unsatisfactory, officers were keen to emphasise that attendance should also be considered on an individual basis. For example, officers suggested that it should be considered a relative success if a pupil's attendance increases from 25% to 80%. It was also noted that once a pupil misses a proportion of the school year it is impossible for them to attain 95% attendance. The Committee appreciated this view, however concluded that alternative provision pupils must be held to the same standards as the mainstream cohort. For pupils to benefit from the specialist support they are receiving in alternative provision they must attend regularly. It was also commented that there is an additional cost to alternative provision and pupils must attend for value for money to be realised. **The Committee believes that alternative provision pupils should be achieving the benchmark of 95% attendance. There should be clear escalation policies around pupil attendance, with a robust accountability framework supporting this.**

The Committee considered the accountability of schools in improving attendance and outcomes. Throughout the review it was emphasised that schools retained statutory responsibility for pupils referred to alternative provision (so long as they had not been excluded) however there were concerns that the engagement of schools in the education of referred pupils varied considerably. Some witnesses suggested that schools could have a "hands off" approach once pupils are referred, considering that their responsibility had been delegated. It was thought that greater involvement from some schools would help to support pupil outcomes.

The Committee concluded that **it is important that schools do not consider pupils to be "out of sight, out of mind" once they are referred to alternative provision. Whilst referral back to mainstream education is not always possible or desirable, it may be appropriate and beneficial in some instances for the pupil to remain a member of the school community, especially as schools are still accountable for their outcomes. Schools should remain actively involved in the welfare of pupils, especially on matters such as safeguarding and attendance, and should consider involving pupils in extra-curricular activities as appropriate.**

The Committee sought to identify best practice for schools in how to work with with vulnerable pupils, as this could increase the effectiveness of support mechanisms in school and assist pupils in staying in mainstream education. One suggested improvement from providers was on schools' perception of alternative provision. It was reported that some pupils had a negative view of

alternative provision as their school had used the threat of referral as a punishment. Pupils then considered that they had failed because they had been referred. This problem was sometimes compounded if pupils were not studying GCSEs, as mainstream schools emphasised that GCSEs were an essential minimum requirement for colleges and any future employment. It was thought that if pupils had the mind-set that they had been referred for their own benefit and that alternative provision was going to provide them with new skills and experiences then they would be far more likely to succeed.

Following detailed consideration of the different approaches of schools, **the Committee identified the “never give up” approach adopted by schools such as Elizabeth Garrett Anderson and Highbury Fields to be best practice. Alternative provision should only be used as a last resort once all other attempts to engage the child in mainstream education have been exhausted. However, to ensure the best outcomes for the children that are referred due to exceptional circumstances, the council should work with schools and providers to improve the perception of alternative provision. It is important that alternative provision is viewed as a fresh start and a legitimate alternative to mainstream education for those who truly need it and not as a setting for failed pupils. Alternative provision should not be used as a threat.**

The Committee noted that a number of schools had implemented their own targeted interventions. Although the Committee did not consider the effectiveness of these in detail, it was thought that focusing on aspirations, positive works ethics and achievement would develop the resilience of pupils, help to identify positive pathways and ultimately assist in keeping pupils engaged in mainstream education. The Committee also considered best practice for primary schools; evidence was received from the Head of School Improvement (Primary) who emphasised the importance of instilling positive learning attitudes from a young age. The Committee recommends that **the council should encourage schools to implement targeted interventions for pupils at risk of referral to alternative provision. Such interventions should not narrowly focus on attainment, but should seek to raise aspirations, identify pathways and develop pupil resilience. The Committee is especially keen for such interventions to begin in primary school.**

The Committee also considered the best practice operated by alternative provision providers and queried if some of the techniques used effectively by providers could be translated into schools in order to support pupils at risk of referral. For example, it was suggested that mainstream schools could enforce discipline inconsistently, whereas Boxing Academy pupils needed clear boundaries and consistent discipline. Conversely, the Committee also thought that some providers could learn from mainstream schools. Some evidence received highlighted concerns that that the general standard of teaching and learning in alternative provision is not as high as that of mainstream school, particularly in relation to academic subjects such as English and Maths. The Committee thought that further partnership work should be encouraged and recommended that **shared learning should be facilitated between schools and alternative provision providers to increase standards in both settings. This could develop the teaching skills of alternative provision providers and assist schools in implementing the most effective behaviour management techniques for challenging pupils.**

The Committee reviewed matters related to the range, quality, standards and value for money of providers. There are a range of provisions available to pupils, including colleges offering vocational options alongside core academic subjects, practical courses such as carpentry and plumbing, academies with an emphasis on sport and schools which specialise in arts and media. The vocational options on offer include business, media, tourism, customer services, child care, hair and beauty, and music technology. As well as a range of subjects, there is also a range of learning styles available to suit pupils' needs.

The cost of provisions varied and the Committee did not compare the specific cost of each provision, however it was noted that schools paid the full cost of alternative provision for Year 10 pupils and the council only paid a supplement towards Year 11 pupils. The Committee noted the

difficulty of assessing value for money when attendance and outcomes were not satisfactory; however the schools who gave evidence thought that alternative provision represented good value for money.

In 2015 there was a significant increase in the number of pupils achieving Level 1 or above in Maths and English, increasing to 36% from 16.7% the previous year, however overall attainment remained relatively low. The schools participating in the review agreed that provisions were generally of a decent quality and this reflected the quality evaluation data, as set out earlier in the report. However, there were some concerns that alternative provision did not offer a strong enough academic challenge and that some providers did not have high enough aspirations for their pupils. For this reason, the Committee recommends that **the Council should only use alternative provision providers that have a broad outlook and high aspirations for their pupils; providers should focus on academic achievement and personal skills as well as pupil behaviour**

The early intervention and 'whole family' approach adopted by the council is intended to resolve issues before they become entrenched. The Committee noted that partnership work was underway between the Alternative Provision service and the Islington Families Intensive Team (IFIT) to increase the number of pupils educated in mainstream school and reduce the demand on alternative provision. A pilot project commenced in Autumn 2015 which provides a project worker to review schools' intervention practices, offer IFIT support to the families most in need and signpost to other services. The project worker is intended to integrate with existing support mechanisms in schools and reduce the number of young people referred to alternative provision by 25 a year. It was also noted that a Family Intervention Worker is being allocated to each school outside of the pilot project.

The Committee hopes that the early intervention work will be successful and developed further. It is recommended that **the council should continue to develop its wrap-around early help services for pupils at risk of referral to alternative provision in partnership with schools. It should be the aim to provide comprehensive and integrated support to pupils at risk of referral and their families at the earliest possible stage, in order to reduce the need for alternative provision by Key Stage 4.**

Conclusions

Overall, the Committee concluded that mainstream school is the best setting for the vast majority of pupils, however appreciated that alternative provision is beneficial for a small number of pupils disengaged from mainstream education. It is hoped that outcomes will be improved through strengthening referral mechanisms and developing the support provided to pupils within alternative provision and those at risk of referral.

The Committee has made fifteen recommendations related to the review objectives. Several of the recommendations are intended to minimise the need for and use of alternative provision. Recommendations have also been made to increase the effectiveness of alternative provision for the pupils who do require this style of education.

In carrying out the review, the Committee met with officers, alternative provision providers, senior school representatives and pupils to gain a balanced view. The Committee would like to thank the witnesses that gave evidence in relation to the scrutiny. The Executive is asked to endorse the Committee's recommendations.

Recommendations

Referral and assessment for Alternative Provision

1. The alternative provision referral process be strengthened in order to increase the accountability of schools and potentially reduce the number of pupils referred. It is recommended that a formal referral panel be established to consider applications for referral, the membership of which should include senior school representatives and relevant council officers. This panel should have the authority to approve or decline applications and make recommendations associated with the child's education where appropriate.
2. To ensure that the educational and other needs of pupils are identified and that they have access to appropriate support, a standardised assessment framework be introduced for those pupils proposed to be referred to alternative provision. Such assessments should be carried out by schools before pupils are referred to alternative provision.
3. Guidance be produced to support schools in making applications to the referral panel, and to assist the referral panel in decision-making. When considering a referral the panel should consider factors such as the needs of the pupil identified via assessment, the support available to the pupil inside and outside of school, the pupil's long term aspirations, attainment levels and the wishes of the pupil.

Early intervention

4. The council should encourage schools to implement targeted interventions for pupils at risk of referral to alternative provision. Such interventions should not narrowly focus on attainment, but should seek to raise aspirations, identify pathways and develop pupil resilience. The Committee is especially keen for such interventions to begin in primary school.
5. The council should continue to develop its wrap-around early help services for pupils at risk of referral to alternative provision in partnership with schools. It should be the aim to provide comprehensive and integrated support to pupils at risk of referral and their families at the earliest possible stage, in order to reduce the need for alternative provision by Key Stage 4.
6. As alternative provision pupils tend to have a higher level of need and vulnerabilities, the council should review the SEN and CAMHS support available to alternative provision pupils and consider increasing the level of support if required.
7. The council should seek to further develop information sharing systems between the alternative provision service and other relevant areas of the council to ensure that the best interests of children are secured.

Supporting Alternative Provision pupils to achieve good outcomes

8. All pupils should have the opportunity to study GCSEs and should be encouraged and supported to do so. The council should aspire for all pupils to achieve at least a grade C in GCSE English and Maths.

9. The council review the options and pathways available for pupils wanting to study vocational qualifications at Key Stage 4, to ensure that the demand for vocational education does not contribute towards the need for alternative provision.
10. The council should review its post-16 employment and skills outreach support offer to alternative provision pupils. The level of advisory support offered by alternative provision providers varies and a minimum offer should be agreed to ensure the best outcomes for pupils.
11. The Committee believes that alternative provision pupils should be achieving the benchmark of 95% attendance. There should be clear escalation policies around pupil attendance, with a robust accountability framework supporting this.
12. The Council should only use alternative provision providers that have a broad outlook and high aspirations for their pupils; providers should focus on academic achievement and personal skills as well as pupil behaviour.
13. Shared learning should be facilitated between schools and alternative provision providers to increase standards in both settings. This could develop the teaching skills of alternative provision providers and assist schools in implementing the most effective behaviour management techniques for challenging pupils.

Accountability

14. The Committee identified the “never give up” approach adopted by schools such as Elizabeth Garrett Anderson and Highbury Fields to be best practice. Alternative provision should only be used as a last resort once all other attempts to engage the child in mainstream education have been exhausted. However, to ensure the best outcomes for the children that are referred due to exceptional circumstances, the council should work with schools and providers to improve the perception of alternative provision. It is important that alternative provision is viewed as a fresh start and a legitimate alternative to mainstream education for those who truly need it and not as a setting for failed pupils. Alternative provision should not be used as a threat.
15. It is important that schools do not consider pupils to be “out of sight, out of mind” once they are referred to alternative provision. Whilst referral back to mainstream education is not always possible or desirable, it may be appropriate and beneficial in some instances for the pupil to remain a member of the school community, especially as schools are still accountable for their outcomes. Schools should remain actively involved in the welfare of pupils, especially on matters such as safeguarding and attendance, and should consider involving pupils in extra-curricular activities as appropriate.

MEMBERSHIP OF THE CHILDREN'S SERVICES SCRUTINY COMMITTEE – 2015/16

Councillors:

Councillor Kaya Comer-Schwartz (Chair)
Councillor Nick Ward (Vice-Chair)
Councillor Alice Donovan
Councillor Rakhia Ismail
Councillor Michelline Safi Ngongo
Councillor Angela Picknell
Councillor Diarmaid Ward
Councillor Nick Wayne

Co-opted members:

Erol Baduna, Primary Parent Governor
James Stephenson, Secondary Parent Governor
Mary Clement, Roman Catholic Diocese

Substitutes:

Councillor James Court
Councillor Alex Diner
Councillor Jenny Kay
Councillor Alice Perry
Councillor Dave Poyser

Acknowledgements:

The Committee would like to thank all the witnesses who gave evidence to the review.

Officer Support:

Jeff Cole – Head of School Improvement (Secondary)
Gabby Grodentz – Head of Alternative Provision
Jonathan Moore – Senior Democratic Services Officer
Tania Townsend – Children's Partnership Development and Strategy Manager

1. Introduction

1.1 The Committee commenced the review in September 2015 with the following overall aims:

- To identify how we can reduce the numbers of children on alternative provision;
- To identify how we can ensure that provision is of the highest quality;
- To make recommendations to further improve the outcomes, attendance, and accountability for those in alternative provision;
- To identify how schools and academies are ensuring the best possible outcomes for the most vulnerable children, including their emotional well-being, and make recommendations about how best practice can be in place in all schools and Academies;
- To evaluate the quality, standards and value for money of alternative provision providers, and the range of provision;
- To identify how early intervention and 'Think Family' approaches can be mainstreamed once the pump priming funding is no longer available.

1.2 Evidence was received from a variety of sources. In carrying out the review the Committee received evidence from officers within the Children's Services directorate, in particular the Alternative Provision team; representatives of alternative provision providers, local schools and the New River College Pupil Referral Unit; pupils in alternative provision and a provider from another London Borough. The Committee conducted visits to the council offices and two providers to assess the delivery of alternative provision first hand and hear from staff. The Committee was also provided with written information, including briefing notes produced to support the review and a number of reports on the national context of alternative provision.

Local context

1.3 The term 'Alternative Provision' refers to educational settings outside of mainstream school, suitable for pupils who are unable to remain in mainstream education due to their behaviour, illness or other reasons. Although the national definition of alternative provision encompasses provision for excluded pupils (i.e. pupil referral units), the focus of the committee's review was narrower, with an emphasis on the provision used as a last resort for pupils who are at risk of exclusion.

1.4 Islington has a significant number of pupils referred to such provision, varying between 150 and 200 pupils over the past three years. The impetus for reviewing alternative provision was that outcomes for these pupils are generally unsatisfactory compared to their peers. Alternative provision pupils tend to have vulnerabilities, have lower levels of attendance and attainment, and exhibit behavioural problems. Statutory guidance expects alternative provision to enable pupils to achieve educational attainment on par with their peers regardless of circumstances; however in 2015 only 36% of alternative provision pupils received any pass grade in both English and Maths. Alternative provision is intended to help pupils overcome their behavioural difficulties; however 41% of young offenders in the borough had previously been in alternative provision. More than 50% of pupils are considered to be persistently absent. The majority of the cohort are white males from non-working families and at some point have received targeted intervention from agencies such as the Youth Offending Service, Targeted Youth Support, Families First, IFIT, AMASS and Children's Social Care. Around one in five pupils become NEET within a year of completing alternative provision, although this number is improving.

1.5 The performance of alternative provision pupils is a national issue and has been for some years. The previous Coalition Government sought to make policy improvements and appointed an expert advisor, Charlie Taylor, to report on the state of alternative provision and make recommendations to raise standards. Ofsted has also reviewed alternative provision nationally

and identified common weaknesses included safeguarding, poor reporting on academic performance and insufficient monitoring.

- 1.6 Alternative Provision in Islington is coordinated by the council. This is not a statutory requirement. Whilst local authorities are responsible for arranging suitable education for permanently excluded pupils, schools are responsible for the education of the pupils at risk of exclusion referred to alternative provision and could make referrals outside of the council's scheme. However, in Islington the local authority provides an alternative provision service in order to establish a clear and standardised local framework in which pupils are referred to a quality-assessed provider, suitable for their needs, with strong monitoring arrangements in place. The council uses 15 providers of alternative provision across north London, however bespoke provision can be sought if required. All but one local school makes use of the council's service; the exception being City of London Academy. However, the Academy places all alternative provision pupils at New River College, which due to strong partnership arrangements enables the council to monitor outcomes for all of the borough's alternative provision pupils.
- 1.7 In this context, the scrutiny review sought to assess the quality of local arrangements and make recommendations to improve their effectiveness. At the time the review started work was already underway to improve local arrangements. In particular, the council had identified the priorities of reducing the number of young people in alternative provision, improving the quality of alternative provision, and supporting the most vulnerable pupils. Attendance and attainment had been identified as the key areas for improvement.

2. Findings

Reducing the numbers of children on alternative provision

- 2.1 One aim of the scrutiny review was to identify how the numbers of children on alternative provision could be reduced. Children who spend a significant amount of time outside of mainstream school are known to have reduced life chances; and given the comparatively poor outcomes of alternative provision pupils the council had already identified that reducing the number of children in alternative provision was vital to improving outcomes.
- 2.2 The council had been working to reduce the number of admissions in recent years. The alternative provision service had developed referral and challenge processes since it was formed 2010; and a wrap-around support service (detailed later in this report) was piloted in 2015/16 as a form of early intervention, with the intention of keeping pupils at risk of referral in mainstream education. The number of alternative provision pupils decreased from 196 in 2012/13 to 124 in 2015/16 and it was the department's aim to reduce the number of pupils to around 100 in 2016/17.
- 2.3 There were several aspects to be considered in regard to this aim. First and foremost, the Committee sought reassurance that reducing the number of pupils in alternative provision was actually the right approach to improving outcomes for these young people. Following a large amount of evidence received, as summarised throughout this report, the Committee considers good-quality alternative provision to be a valid pathway for those who truly need an alternative to mainstream education; however the best place for the vast majority of pupils is in mainstream school and alternative provision should only be used as a last resort.
- 2.4 The Committee concluded that there were two main methods to reducing the number of pupils in alternative provision; and considered that a combination of the two was required in order to be effective. The first was that numbers be reduced by working to decrease the demand, or the need, for alternative provision. This is not a "quick fix"; work to reduce the need for alternative provision will be long term and will involve early intervention approaches and providing support

within mainstream schools to pupils at risk of referral, both of which are covered in detail elsewhere in this report. Working to raise aspirations, rectify behavioural issues, and support pupils – particularly the most vulnerable – in engaging with mainstream education should decrease the need for alternative provision, however this is a long term ambition centred around ways of working, as opposed to immediate actions.

- 2.5 However, the Committee did acknowledge another way to reduce demand for alternative provision. The evidence received from local schools identified two broad types of pupils referred to alternative provision. Those who, because of their behavioural, social, emotional, or other issues, were unable to function effectively in a mainstream education setting; and those who did not flourish in mainstream education and were attracted to the vocational education offered in alternative provision. This distinction is not entirely clear cut and to an extent there is some overlap between these two groups of pupils, however the witness evidence received suggested that some schools were more ready than others to refer pupils to alternative provision, particularly when it was thought that they would receive greater benefit from vocational education, sometimes accommodating requests of the pupil and their parents. Referrals data for 2015-16 indicated that pupil or parent request was the main reason for referral for 24 of the 124 pupils referred to alternative provision in that year. Requesting alternative provision was a contributing factor in a further 22 referrals, alongside behavioural issues, low attendance, or a combination of the two.
- 2.6 Whilst the Committee appreciates that not all pupils excel in academic subjects, it is not considered appropriate to refer pupils to alternative provision on request as a means of enabling them to study vocational qualifications. Alternative provision is intended to be used as a last resort for a small minority of pupils, and the difference must be maintained between those disengaged from mainstream education as a result of their behavioural problems or social and emotional difficulties, and those who are disinterested in mainstream education and would prefer a vocational pathway. Throughout the review a number of witnesses suggested that alternative provision can have an excessive emphasis on pupil behaviour; although the Committee agrees that the primary focus of alternative provision should be teaching and learning, it is also acknowledged that a sustained focus on behaviour is often required for those pupils who truly need alternative provision.
- 2.7 The Committee does not consider alternative provision to be an acceptable route into vocational education and would suggest that attaining GCSEs in mainstream school before commencing vocational studies would likely lead to better outcomes. However, the use of alternative provision in this way does suggest that there is currently an unmet demand for vocational qualifications to be provided within, or alongside, mainstream education. Although the widespread availability of vocational qualifications post-16 is recognised, **the Committee recommends that the council review the options and pathways available for pupils wanting to study vocational qualifications at Key Stage 4, to ensure that the demand for vocational education does not contribute towards the need for alternative provision.**
- 2.8 The other means by which to reduce the number of pupils in alternative provision is to amend the referral system. The Committee considered the current referral system, which is based around the ‘information passport’, a document completed by the school which provides background information about the pupil, detailing the interventions attempted to date, the reasons for referral, and other information intended to help the council and the alternative provision provider when placing a pupil.
- 2.9 The system is easy to navigate for pupils and parents as it is similar to the familiar process of applying for school places: once a referral is made by a school, the Alternative Provision team will make contact with the family and arrange visits to up to four providers. The family will then contact the Alternative Provision team to agree their final choice. It was advised that pupils who

engage in the referral process and visit multiple providers tend to integrate into alternative provision more successfully.

- 2.10 It was found that the information passport process does offer a level of challenge on referrals, in that schools are required to demonstrate that interventions within school have been attempted and meetings with parents have been held, however evidence received from officers highlighted difficulties with effectively challenging schools. It was noted that the quality of referral paperwork varies between schools, with some providing much more detail to justify referrals than others. As schools are ultimately responsible for the child's education, officers have to be cautious as if the council refused to accept a referral then a school could choose to make their own arrangements with a provider outside of the council's framework or exclude the pupil, both of which are likely to lead to poorer outcomes for the pupil.
- 2.11 It was suggested that a more rigorous referral mechanism could offer an increased level of challenge and help to deter some referrals. The Committee considered that establishing a formal panel process, through which schools would be required to present a robust case supported by evidence, would be the best approach. Crucially, the Committee concluded that schools should be active participants in this panel process, with senior school representatives on the panel to provide peer review to other schools. It is thought that it may help to establish a best-practice consensus among schools as to when it is appropriate to refer to alternative provision. The Panel may also consider it appropriate to refer pupils to other agencies or services before it is decided to remove them from mainstream education. It was noted that a similar arrangement is operated in the London Borough of Redbridge, and sometimes pupils are referred to another mainstream school instead of alternative provision.
- 2.12 **It is therefore recommended that the alternative provision referral process be strengthened in order to increase the accountability of schools and potentially reduce the number of pupils referred. It is recommended that a formal referral panel be established to consider applications for referral, the membership of which should include senior school representatives and relevant council officers. This panel should have the authority to approve or decline applications and make recommendations associated with the child's education where appropriate.**
- 2.13 The Committee appreciates that adopting a new referral mechanism will be a considerable change for both council officers and local schools. Schools will need support in both making referrals to the panel and decision-making when acting as a member of the panel. Referral criteria will also need to be established; the Committee suggests that robust but holistic criteria are adopted which offer real challenge to schools yet consider a range of factors to ensure that the best interests of the pupil are served. Therefore, **it is also recommended that guidance be produced to support schools in making applications to the referral panel, and to assist the referral panel in decision-making. When considering a referral the panel should consider factors such as the needs of the pupil identified via assessment, the support available to the pupil inside and outside of school, the pupil's long term aspirations, attainment levels and the wishes of the pupil.**

Ensuring that provision is on the highest quality

- 2.14 Given the vulnerabilities of many alternative provision pupils and that their outcomes are generally not as good as their peers; the Committee was keen to ensure that alternative provision was of the highest quality. The Committee noted the quality evaluation framework used to assess providers and found this to be robust. The Council is a member of the North London Children's Efficiency Programme (NLCEP) which jointly carries out Ofsted-style quality evaluations of providers across north London. This approach was developed to ensure that providers work to a common assessment framework which monitors consistency and quality in

leadership, management and delivery of vocational options for all alternative provision students. This partnership approach is also efficient, in that providers are not required to undergo repeated assessment from each individual borough, allowing them to focus on teaching.

- 2.15 The quality assessment framework covers areas such as safeguarding, health and safety, achievement and standards, teaching and learning, behaviour and safety, welfare and wellbeing, leadership and management, and so on. The criteria are weighted so that areas such as safeguarding and teaching and learning have a greater influence on the overall grade than areas such health and safety.
- 2.16 Quality assurance visits are carried out every two years unless a provision is graded as Inadequate or Requires Improvement. If a provision is graded as Inadequate then referrals are stopped and the provider is visited each half term to establish if improvements are being made. If improvements are not made quickly then the use of the provision is terminated. Provisions which receive the Requires Improvement grade are subject to a follow up assessment and are expected to achieve Good within a year or have made substantial progress towards that grade.
- 2.17 Of the 15 providers used by Islington, 11 had received full quality assurance visits in the last two years. Of those 11, six were graded as Good and five were graded as Requires Improvement. Following each quality assurance visit a Quality Improvement Plan is written in agreement with the provider. This identifies areas of weakness and actions and targets which need to be in place to support improvement; the plan is jointly reviewed by the provider and the council every half term. Data on provider quality is shared with schools and schools are invited to participate in quality assurance visits. The Committee was encouraged that officers had very regular contact with providers outside of the formal quality assessment framework, and therefore officers were able to informally monitor progress on visits to provisions, and had a sense of the day-to-day running of each provision. It was noted that the council also participates in training of alternative provision staff on inset days through the NLCEP.
- 2.18 Although some providers required improvement, the Committee was satisfied with the quality assurance framework and procedures in place. However, the Committee did consider wider issues relating to the qualifications on offer, aspirations for pupils and additional support available to pupils, and suggested that some improvements could be made in this area.
- 2.19 Many alternative provision providers offer vocational qualifications as, in general, these are best suited to their cohort. Some providers offer GCSEs including English and Maths; however this is not true in all cases, with some offering 'functional skills' qualifications as an alternative. Some providers, such as City and Islington College, offered both qualifications, however the many pupils studied for functional skills as these were not as challenging as GCSEs and providers did not want to set their pupils up to fail. This approach was supported by the council's Alternative Provision team, who noted that many alternative provision pupils sitting GCSEs did not pass and for this reason they were working with providers to identify pupils at risk of failure and move them onto Functional Skills qualifications. It was also noted that the alternative provision referral process could present barriers to studying GCSEs, for example, one pupil interviewed on a scrutiny visit wanted to sit GCSEs however was referred too late in the academic year to begin his studies.
- 2.20 The Committee had a number of discussions on the value of qualifications such as functional skills. Although it was recognised that alternative provision pupils are often less academically able than the mainstream cohort, the Committee considered that providers should be offering a challenging curriculum to their pupils in order to best prepare them for the future. There was a suggestion that some providers excessively focused on pupil expectations as opposed to aspirations and this could be to the detriment of some pupils. Some pupils in alternative provision are capable of sitting GCSEs and the Committee thought it to be a disservice to not allow them to study these qualifications if they want to, especially as functional skills are generally not as

valued by colleges and employers. The Committee recommended that **all pupils should have the opportunity to study GCSEs and should be encouraged and supported to do so. The council should aspire for all pupils to achieve at least a grade C in GCSE English and Maths**, or the equivalent benchmark grade following the introduction of the numerical grading system in 2017. It is appreciated that not all pupils will be able to achieve this grade; however alternative provision pupils are expected to be on par with the mainstream cohort and aspiring for pupils to achieve the benchmark grade is therefore appropriate. The Committee recognises that this may present a technical challenge as some providers do not offer these qualifications, however it is hoped that suitable arrangements can be made for those pupils wanting to study GCSEs.

- 2.21 The Committee also thought that improvements could be made to employment and careers support. In 2010/11, 34% of alternative provision pupils went on to become NEET. The Committee welcomed that this number had decreased to 12.4% by 2015/16, although noted that this was partially attributable to changes in how data is recorded and was still a considerable proportion of pupils.
- 2.22 The Committee found that the level of careers support varies significantly depending on the scale of the provider. For example, on a visit to City and Islington College it was noted that the college had a dedicated careers service, as would be the norm for a large further education college, with alternative provision pupils able to access this alongside the college's other pupils. In comparison, The Boxing Academy is a very small alternative provision setting and, although their dedication to their pupils could not be faulted, did not have the same resources available for careers advice. The Committee concluded that the council could assist in this area by offering additional support to providers who do not have substantial resources to provide careers advice, as required. It was recommended that **the council should review its post-16 employment and skills outreach support offer to alternative provision pupils. The level of advisory support offered by alternative provision providers varies and a minimum offer should be agreed to ensure the best outcomes for pupils.**

Outcomes, Attendance and Accountability

- 2.23 The Committee reviewed a range of evidence related to pupil outcomes and considered how these could be improved. Although the outcomes of alternative provision pupils vary, many do not achieve as well as the mainstream cohort. When considering the outcomes of some alternative provision pupils, it is essential to understand the types of issues affecting them. Evidence received indicated that many alternative provision pupils have a high level of need. Pupils may have behavioural or emotional difficulties, learning disabilities, mental health issues, or difficult home lives due to domestic violence, substance abuse, or other issues. Pupils may be known to the youth offending service. Many pupils had previous or ongoing involvement from statutory or non-statutory agencies.
- 2.24 Case studies were provided by officers to highlight the variation in outcomes of young people in alternative provision and the types of issues that affect them. One young male was referred to alternative provision, after initially engaging he suddenly stopped and his attendance dropped to 30%. It was discovered that a gang had taken him to a house outside of London where he was left by himself and forced to sell drugs. Once he was re-integrated into alternative provision his attendance improved to 82%, he received 3 A*s at GCSE and won a scholarship to a high-ranking boarding school, where he was studying for four AS levels. This positive outcome was in contrast to another young male who was achieving above average results at Key Stage 3, however insisted that he did not want to sit GCSEs and preferred vocational education outside of school. He entered alternative provision; however had behavioural difficulties and his attendance rate decreased. His parents had difficulties setting boundaries at home, however refused support from the local authority. He developed a cannabis habit and left alternative provision classified as NEET.

- 2.25 The Committee considered the variation in outcomes and suggested that while alternative provision can be very effective in turning around pupils disengaged from mainstream education, some pupils require additional support is required in order for alternative provision to be effective. For example, whereas mainstream schools will have an SEN coordinator and corresponding resources to ensure that pupils with SEN receive the right support, there is no equivalent position to oversee SEN support for all alternative provision pupils. Some schools, but not all, involve their SEN coordinator with their pupils referred to alternative provision. The expertise of providers and their capacity to offer additional SEN support varies. It was noted that the council's alternative provision team did monitor SEN support and discussed particular needs with providers, however officers did not have a wealth of experience in this area and only had limited resources to offer support.
- 2.26 A similar position was evident for mental health support. Schools may provide counsellors for pupils in need of support, whereas many providers do not have the resources to provide this. It was thought that mainstream schools had established relationships with CAMHS which eased referral processes however the same support was not as accessible to alternative provision pupils. Officers highlighted that some pupils would benefit from counselling or other specialist mental health support, particularly on bereavement issues. There were instances of alternative provision pupils being absent for up to two months following the death of a parent or a grandparent; it was noted that a number of pupils had grandparents as their main carer which meant that their death affected them more acutely than other children. The Committee recommends that, **as alternative provision pupils tend to have a higher level of need and vulnerabilities, the council should review the SEN and CAMHS support available to alternative provision pupils and consider increasing the level of support if required.** It was suggested that girls in particular may be in greater need on CAMHS support. John d'Abbro commented that, from his experience, young women tended to internalise problems which then presented as mental health issues, whereas troubled young men more often exhibited challenging behaviour. It was thought this was a problem for society as a whole, as the invisibility and stigma of mental health issues could result in female pupils not accessing appropriate support services.
- 2.27 The providers interviewed suggested that some alternative provision pupils have undiagnosed special educational needs and therefore the true level of need is greater than the number of SEN pupils known to the alternative provision service. In particular, it was highlighted that speech and language difficulties were widespread. A number of pupils also had attention disorders. There was a general concern that these needs had not previously been identified in the pupil's mainstream school, and it was queried if a referral would have been necessary if needs were identified and support was offered at a much earlier stage. It was thought that the smaller class sizes in alternative provision allowed more subtle educational needs to be identified. New River College, which also hosted excluded pupils, noted that it was in the process of developing Education Health and Care Plans for around 30 pupils who did not have a recognised special educational need at the time of their referral.
- 2.28 Although the needs and abilities of alternative provision pupils are assessed by their providers on referral as a matter of course, there is some concern about the assessment systems used. Officers and some providers thought that the assessment system favoured by the Department for Education and some providers was not sufficiently detailed. Some providers made use of the 'Yellis' assessment system as an alternative, which incorporated a cognitive assessment and was considered to be more detailed. It was concluded that the alternative provision system would benefit from a standardised pupil assessment framework, and the best way for this to be implemented would be through schools prior to referral, as this could highlight previously unidentified needs and might result in new interventions being attempted which may allow pupils to remain in mainstream school. **To ensure that the educational and other needs of pupils**

are identified and that they have access to appropriate support, a standardised assessment framework be introduced for those pupils proposed to be referred to alternative provision. Such assessments should be carried out by schools before pupils are referred to alternative provision.

- 2.29 The Committee also considered that outcomes could be improved by strengthening information sharing between services. A number of pupils receive family support from either statutory or non-statutory services; the alternative provision team is provided with the details of social workers allocated to pupils, however suggested that a more regular supply of information would assist with monitoring pupil process. The alternative provision team had sought to develop stronger relationships with social care, however commented that this can be difficult due to a particularly high turnover of staff. It is recommended that **the council should seek to further develop information sharing systems between the alternative provision service and other relevant areas of the council to ensure that the best interests of children are secured.** The Committee noted that some gaps in information were more difficult for the council to close. Although not only relevant to alternative provision, one school expressed concern about 'school hopping' pupils; those who move between local authority areas frequently to avoid exclusion and family intervention. Sometimes these pupils were from very challenging backgrounds but this was not apparent as the family was not known to local schools or agencies.
- 2.30 The attendance of alternative provision pupils is a significant problem and the Committee considered the reasons for this and the work underway to raise attendance. Over 60% of alternative provision pupils have an attendance rate of less than 95%, the government benchmark for attendance, and more than 50% are persistent absentees. Many pupils have poor attendance records prior to referral, with poor attendance being a factor in around a quarter of referrals. Attendance tends to decline throughout the academic year, with notable annual decreases in attendance following the Christmas holidays and towards the end of the academic year.
- 2.31 To improve attendance the service appointed an education welfare officer in June 2014 to work with providers, pupils and their families on attendance. This includes sending letters home, meeting with pupils and parents, and carrying out unannounced home visits as required. It was reported that the officer had helped to raise attendance, with an increase of pupils achieving 80% to 95% attendance, however many pupils are still falling short of full attendance. The alternative provision team also seeks to work with other agencies supporting the family to reinforce the importance of attendance. Officers noted that there was a perception among the parents of alternative provision pupils that there was no follow-up on non-attendance, however this was beginning to change slowly as warnings and, in some instances fines, had been issued. Other more positive approaches to supporting attendance have also been successful in some instances, for example certificates and rewards for improved attendance. Although providers noted the work of the education welfare officer, some providers and schools thought that reductions to the council's access and engagement service may adversely affect attendance.
- 2.32 It was suggested that some providers had not always sufficiently followed up non-attendance; however some provisions were very effective at improving pupil attendance. On a visit to The Boxing Academy, it was commented that attendance was often poor prior to referral however tended to improve at the Academy. It was thought that this was due to the Academy's family feel, positive atmosphere, and the relationship between pupils and staff. The Academy was also tough on pupils who did not attend, and would collect absent pupils from their home if required. Pupils also received punishments for lateness, for example washing up at lunchtime or doing press-ups, which may not be appropriate at other providers however worked well within the family-oriented and sports-focused ethos of the academy.
- 2.33 The Committee discussed attendance on several occasions. Although it is true that the attendance of many alternative provision pupils is unsatisfactory, officers were keen to

emphasise that attendance should also be considered on an individual basis. For example, officers suggested that it should be considered a relative success if a pupil's attendance increases from 25% to 80%. It was also noted that once a pupil misses a proportion of the school year it will be impossible for them to attain 95% attendance. The Committee appreciated this view, however concluded that alternative provision pupils must be held to the same standards as the mainstream cohort. For pupils to benefit from the specialist support they are receiving in alternative provision they must attend regularly. It was also commented that there is an additional cost to alternative provision and pupils must attend for value for money to be realised. **The Committee believes that alternative provision pupils should be achieving the benchmark of 95% attendance. There should be clear escalation policies around pupil attendance, with a robust accountability framework supporting this.**

2.34 The Committee considered the accountability of schools in improving attendance and outcomes. Throughout the review it was emphasised that schools retained statutory responsibility for pupils referred to alternative provision (so long as they had not been excluded) however there were concerns that the engagement of schools in the education of referred pupils varied considerably. Schools had the ability to monitor the attendance of their referred pupils daily and were provided with progress reports at least every half term. However, whilst some schools were acutely aware of their accountability, it was known that not all schools closely monitored attainment, attendance and the well-being of pupils following referral and it was thought that greater involvement from some schools would help to support pupil outcomes. Some witnesses suggested that schools could have a "hands off" approach once pupils were referred, considering that their responsibility had been delegated. It was noted that some schools did not attend child protection meetings for alternative provision pupils, with officers from the alternative provision team attending in their place.

2.35 The Committee appreciated the difficulties associated with schools maintaining involvement; for some pupils the relationship with their mainstream school had deteriorated to such an extent that further involvement in their education may actually be unhelpful, however considered that in general schools should continue to be an active partner in the child's education, especially when alternative provision pupils are known to have additional needs and vulnerabilities and often do not achieve to the same level as their peers. Although alternative provision class sizes were smaller to enable pupils to receive more intensive support, it was also thought that in some respects alternative provision could be insular, and that pupils may benefit from continued involvement in the school community, perhaps through participating in extra-curricular activities.

2.36 As part of the review it was considered if it was feasible for pupils to be referred back to mainstream school, or for alternative provision to be accessed on a flexible basis. It was noted that alternative provision was intended to be short term and that other boroughs, such as Redbridge, referred pupils back to mainstream school regularly. However, alternative provision operated differently in Islington as it was only available at Key Stage 4. As a result any referral back to mainstream school would almost certainly disrupt pupils' studies for GCSEs or other qualifications, as even if the school and alternative provision provider offered the same qualifications, they may be working to different syllabuses. It was thought that flexible alternative provision would not offer the intensive environment that pupils required and would present practical difficulties in terms of timetabling and travel between settings.

2.37 The Committee concluded that **it is important that schools do not consider pupils to be "out of sight, out of mind" once they are referred to alternative provision. Whilst referral back to mainstream education is not always possible or desirable, it may be appropriate and beneficial in some instances for the pupil to remain a member of the school community, especially as schools are still accountable for their outcomes. Schools should remain actively involved in the welfare of pupils, especially on matters such as safeguarding and attendance, and should consider involving pupils in extra-curricular activities as appropriate.**

Best practice for schools and academies

- 2.38 Schools have a major role to play in relation to alternative provision. The Committee sought to identify best practice for schools in how to work with vulnerable pupils, as this could increase the effectiveness of support mechanisms in school and assist pupils in staying in mainstream education. The evidence received suggested that a variety of approaches are being used, and this is mirrored by the disparity in the number of referrals to alternative provision. Some schools consistently referred a high number of pupils, whereas others referred few in comparison.
- 2.39 The Elizabeth Garrett Anderson School explained to the Committee that alternative provision was only used as a last resort. The school had a “never give up” attitude and wanted all of its pupils to remain in mainstream education. Prior to making a referral the school would be as creative and flexible as possible to accommodate pupils in mainstream education, tailoring the curriculum to pupil interests to keep them engaged. Pupils at risk of referral may be permitted to do a different activity for one afternoon a week, or work to a different timetable from other pupils if there is a legitimate reason for this. The school noted that, if they had greater capacity and resources, they would not make referrals to alternative provision and would instead seek to teach pupils in smaller classes and regularly take pupils out of school, to broaden pupils’ horizons and provide a more nurturing environment within mainstream education. The school made a low number of referrals in comparison to other schools.
- 2.40 St Aloysius’ College noted that its pupils had made good progress in alternative provision and that referrals often led to positive outcomes. The college did not recognise the need to decrease the number of pupils being referred to alternative provision, commenting that not all pupils were academic and alternative provision provided a vocational pathway that was better suited to the strengths of some pupils. Before referring pupils to alternative provision the school would monitor pupil progress and involve parents in discussions about the pupil’s pathway. The school made referrals to CAMHS, counselling, inclusion or anger management services as appropriate; and had also appointed pupil mentors, pairing Year 11 pupils with Year 9s, to encourage pupils to stay in mainstream education. However, it was noted that the school’s most challenging pupils tended to stay within mainstream education and the school did not consider alternative provision to be a setting exclusively for children with behavioural problems or other difficulties. Whilst the school recognised the limited resources available for alternative provision, it was queried if alternative provision should be considered as a pathway within a school ‘options’ system. Due to the demand for vocational qualifications the school had introduced a pathway for pupils post-16 which included BTEC qualifications at Levels 2 and 3 alongside GCSE English and Maths re-sits as required. The school suggested that many schools do not have technical facilities, such as those for woodwork, and there was now a demand for such subjects which could possibly be met through alternative provision, subject to providers being able to admit sufficient numbers of pupils.
- 2.41 Highbury Fields School recognised the importance of early intervention and had implemented internal criteria which had to be met before a referral was made to alternative provision. The school only used alternative provision as a last resort and focused on providing pastoral care and additional support to pupils at risk of referral. In particular, the school placed a great importance on English and Maths GCSEs and revised pupil timetables to give additional focus to these subjects if required. The senior leadership team met daily to discuss struggling pupils and the school’s governing body had agreed to invest in additional CAMHS support for vulnerable pupils. Referrals to external agencies such as Families First or IFIT would be made as appropriate. The school did receive enquires from some parents about referring their child to alternative provision however the school considers that mainstream education is the best setting for all pupils, believing that any pupil can succeed in school with the right level of support. Resources are focused on the most vulnerable pupils and the curriculum is tailored to their needs as far as possible. For such pupils the school made use of learning styles such as small group work, and worked to raise pupil aspirations and expectations. The school made a low number of referrals to

alternative provision.

- 2.42 The Committee also considered evidence from the New River College Pupil Referral Unit. The PRU was both a provider of alternative provision and commissioner, which gave it a unique insight. New River College focused on the needs of individual pupils and sought to give them the skills to make good progress in all aspects of their education. The College used alternative provision differently to mainstream schools; eight of its pupils were on part-time alternative provision as a means of providing them with a bespoke curriculum, and this was a particularly important tool for pupils with specific learning and behavioural needs. For example, some pupils spent two days a week with the Sparkplug organisation which provided training on motorcycle maintenance. It was commented that the behaviour and attendance of pupils on alternative provision tended to improve. New River College highlighted the difficulties its pupils faced and was keen to make referrals to CAMHS, speech and language therapists, and other services.
- 2.43 Several providers interviewed gave their views on good practice which could be applied to schools. Providers noted that alternative provision pupils need intensive support which is difficult to provide in mainstream schools, however commented that smaller class sizes enable teachers to give more attention to individual pupils. This view was mirrored by an alternative provision pupil interviewed by members, who commented that the increased attention he received in smaller classes did not give him the opportunity to misbehave. The value of pastoral support and providing pupils with life skills was highlighted by providers, as was the importance of engaging struggling pupils in their own education. It was suggested that many pupils in alternative provision did not understand the purpose of education and work was needed to rectify this from an early age. It was also commented that the council's School Improvement team did not have a dedicated behaviour specialist and helping schools to effectively manage behaviour may assist some pupils at risk of referral to alternative provision.
- 2.44 One suggested improvement from providers was on schools' perception of alternative provision. It was reported that some pupils had a negative view of alternative provision as their schools had used the threat of referral as a punishment. Pupils then considered that they had failed because they had been referred. This problem was sometimes compounded if pupils were not studying GCSEs, as mainstream schools emphasised that GCSEs were an essential minimum requirement for colleges and any future employment. It was thought that if pupils had the mindset that they had been referred for their own benefit and that alternative provision was going to provide them with new skills and experiences then they would be far more likely to succeed. One Boxing Academy pupil interviewed by members indicated that her school had told her she would not succeed in her chosen career due to her poor behaviour, however commented that the Boxing Academy had a much more supportive and positive outlook and since her referral she had a renewed ambition to succeed.
- 2.45 Following consideration of the above approaches to alternative provision, **the Committee identified the "never give up" approach adopted by schools such as Elizabeth Garrett Anderson and Highbury Fields to be best practice. Alternative provision should only be used as a last resort once all other attempts to engage the child in mainstream education have been exhausted. However, to ensure the best outcomes for the children that are referred due to exceptional circumstances, the council should work with schools and providers to improve the perception of alternative provision. It is important that alternative provision is viewed as a fresh start and a legitimate alternative to mainstream education for those who truly need it and not as a setting for failed pupils. Alternative provision should not be used as a threat.**
- 2.46 Best practice is not only applicable to secondary schools, but also at primary level. Evidence was received from the Head of School Improvement (Primary) who emphasised the importance of instilling positive learning attitudes from a young age. It was noted that pupils were tested 12 times during key stages 1 and 2 and some pupils who were not academically able could lack

confidence, have lower aspirations, or consider themselves to be failures as a result. It is important to provide constructive feedback to these children, with a focus on strengths and weaknesses, instead of grades. It was highlighted that securing good attendance at primary school is important to continuing good attendance at secondary school. It was also suggested that all staff should have the opportunity to contribute to pupil progress meetings, and changes to the curriculum and teaching assistant support should be made to keep children engaged in learning. Officers did not support separating primary school children by ability group and suggested that mixed ability groups better reflected real life and enabled pupils to interact with a greater range of pupils. The exception to this was grouping pupils by reading age when teaching literacy.

- 2.47 The Committee considered the use of pupil premium funding, which was intended to provide a rich and varied education to the most disadvantaged pupils, however was sometimes used on resources to improve attainment, such as “learning to learn” activities. Officers considered it important for schools to use pupil premium funding to vary their educational offer as this helped disengaged pupils. Some schools used the funding to provide varied educational experiences, however did not review their offering annually. It was commented that the best outcomes were achieved when the activities funded were tailored to the cohort. The effective use of pupil premium funding at primary school age was essential to keeping children engaged in education. Officers explained that using pupil premium funding to provide 1-to-1 support was expensive and, although it could assist children in catching-up with their peers, children in receipt of such support did not tend to keep-up in the longer term. For this reason, the council encouraged pupil premium funding to be spent on interventions which focused on developing life skills and resilience.
- 2.48 The Committee noted that a number of schools had implemented their own targeted interventions. Although the Committee did not consider the effectiveness of these in detail, it was thought that focusing on aspirations, positive works ethics and achievement would develop the resilience of pupils, help to identify positive pathways and ultimately assist in keeping pupils engaged in mainstream education. The Elizabeth Garrett Anderson had organised mother and daughter university visits and hosted literacy and numeracy classes for parents. Highbury Fields school had implemented a project titled ‘Achievement for All’ which worked with White British pupils and parents on attendance, attitudes, engagement and aspirations. Families on the project were assigned a mentor in the school and had 1-on-1 meetings three times a year. The programme was focused on pupils in Years 8 and 9, before pupils started their GCSEs, as intervening earlier was thought to lead to the best outcomes. New River College was operating its own ‘Achievement for All’ project and it was commented that this had significantly increased parental engagement. Highbury Grove was also offering additional support to students at risk of referral through the ‘Think Forward’ programme.
- 2.49 The Committee recommended that **the council should encourage schools to implement targeted interventions for pupils at risk of referral to alternative provision. Such interventions should not narrowly focus on attainment, but should seek to raise aspirations, identify pathways and develop pupil resilience. The Committee is especially keen for such interventions to begin in primary school.**
- 2.50 The Committee also considered the best practice operated by alternative provision providers and queried if some of the techniques used effectively by providers could be translated into schools in order to support pupils at risk of referral. For example, it was suggested that mainstream schools could enforce discipline inconsistently, whereas Boxing Academy pupils needed clear boundaries and consistent discipline. This was confirmed by a Boxing Academy pupil from Hackney who advised that she struggled with behaviour in mainstream school as teachers changed rules too often or applied them differently. While mainstream schools will rely on detentions to enforce behaviour, the Boxing Academy ensures that poor behaviour is followed with an immediate punishment, as pupils need to see immediate consequences for their behaviour in order for

discipline to be effective. Punishments are not usually severe; the primary intention is to demonstrate that negative behaviour always has consequences. The Boxing Academy also makes use of creative punishments and used these as learning opportunities. For example, after a minor incident for which no pupil took responsibility, the Academy held a “court” in which pupils provided evidence, argued their case and acted as a jury before the guilty pupil was identified. Although the Committee recognises the uniqueness of the Boxing Academy and that mainstream schools could not replicate its approach in its entirety, further clarity around boundaries, consistent discipline and immediate consequences in mainstream schools may help pupils at risk of referral to alternative provision. It was also noted that some providers incentivise good behaviour through the use of rewards. For example, City and Islington College operated a ‘reward room’ with games consoles. The College also gave pupils access to health and fitness equipment and it was thought that this not only contributed to pupil health and wellbeing, but also behaviour. For the same reasons the College had banned certain food products, such as energy drinks, from the premises. City and Islington College also sought to expand the horizons of pupils through ‘enrichment’ activities; visits to museums and other attractions which provide learning opportunities the pupils may not otherwise access.

- 2.51 Conversely, the Committee also thought that some providers could learn from mainstream schools. Some evidence received highlighted concerns that the general standard of teaching and learning in alternative provision is not as high as that of mainstream school, particularly in relation to academic subjects such as English and Maths. It was noted that the Elizabeth Garrett Anderson School had sought to work with providers to raise standards and some providers had observed lessons at the school, however witnesses explained that, for the most part, there was only limited partnership work between schools and providers. The Committee thought that further partnership work should be encouraged and recommended that **shared learning should be facilitated between schools and alternative provision providers to increase standards in both settings. This could develop the teaching skills of alternative provision providers and assist schools in implementing the most effective behaviour management techniques for challenging pupils.**

Alternative Provision: Range, Quality, Standards and Value for Money

- 2.52 There are a range of provisions available to pupils, including colleges offering vocational options alongside core academic subjects, practical courses such as carpentry and plumbing, academies with an emphasis on sport and schools which specialise in arts and media. The vocational options on offer include business, media, tourism, customer services, child care, hair and beauty, and music technology. As well as a range of subjects, there is also a range of learning styles available to suit pupils’ needs. Provisions such as the City and Islington College offer intensive support inside a large college campus. It was noted that the BSix Sixth Form College was particularly suitable for pupils with additional emotional needs. The Boxing Academy is a small setting with a ‘family’ atmosphere and a focus on ‘tough-love’ and team-work which is particularly helpful for disruptive pupils.
- 2.53 The Committee reviewed the academic results of providers. In 2015 there was a significant increase in the number of pupils achieving Level 1 or above in Maths and English, increasing to 36% from 16.7% the previous year, however overall attainment remained relatively low. It was noted that there was a discrepancy between the number of pupils registered and those who completed exams; five students failed to attend, two were remanded in custody, and there was one fatality. Of those who failed to attend exams, three suffered with mental health issues which impacted on their ability to leave their home.
- 2.54 The scrutiny visits carried out confirmed that providers were using innovative techniques to get the best out of their pupils. The Boxing Academy made use of ‘pod leaders’, staff somewhere

between a teaching assistant, mentor and boxing coach, to provide support to pupils who may distrust traditional teachers and to improve their attitude to education. City and Islington College also made use of non-teaching staff to engage pupils. The providers interviewed placed a great importance on engaging children in their education and developing their life skills. Pupils appeared to be aware of this; most understood the reasons why they had been referred and some spoke of their renewed motivation to achieve. One commented that he truly believed that if it was not for alternative provision he would be in prison. The schools interviewed valued the work of providers in turning around pupils, however there was a concern that some providers did not offer a strong enough academic challenge. Although the pupils referred to alternative provision were disengaged from alternative provision, this did not necessarily mean that they were not academically able.

- 2.55 The cost of provisions varied and the Committee did not compare the specific cost of each provision, however it was noted that schools paid the full cost of alternative provision for Year 10 pupils and the council only paid a supplement towards Year 11 pupils. The Committee noted the difficulty of assessing value for money when attendance and outcomes were not satisfactory; however the schools interviewed thought that alternative provision represented good value for money. In particular, it was thought that although the attainment of pupils varied, alternative provision was the right setting for many pupils. It was also suggested that alternative provision represented an overall saving to the public purse in the longer term. John d'Abbro noted that whilst alternative provision is a costly form of education, when implemented successfully it will reduce the demand on other, more costly high-dependency services – both during childhood and later in life.
- 2.56 The schools participating in the review agreed that provisions were generally of a decent quality and this reflected the quality evaluation data, as set out earlier in the report. However, there were some concerns that alternative provision did not offer a strong enough academic challenge and that some providers did not have high enough aspirations for their pupils. For this reason, the Committee recommended that **the Council should only use alternative provision providers that have a broad outlook and high aspirations for their pupils; providers should focus on academic achievement and personal skills as well as pupil behaviour.**

Mainstreaming early intervention

- 2.57 The early intervention and 'whole family' approach adopted by the council is intended to resolve issues before they become entrenched. The Committee noted that partnership work was underway between the Alternative Provision service and IFIT to increase the number of pupils educated in mainstream school and reduce the demand on alternative provision. A pilot project commenced in Autumn 2015 which provides a project worker to review schools' intervention practices, offer wrap-around IFIT support to the families most in need and signpost to other services. The project worker is intended to integrate with existing support mechanisms in schools and reduce the number of young people referred to alternative provision by 25 a year.
- 2.58 The pilot was taking place in the Holloway, Mount Carmel and Elizabeth Garrett Anderson schools and focused on pupils in Year 9 at risk of future referral to alternative provision. The 'whole family' approach looked to develop parental control and supervision and make changes at home to support the whole family. IFIT provided intensive support in the family home, out of hours if required, and required a minimum of two face-to-face visits a week. The project was funded by the participating schools for one year and at the time of the review it was too early to evaluate the effectiveness of the pilot. However, if the pilot was successful it was hoped to expand the project to other schools and year groups, subject to further funding being secured from local schools. It was noted that a Family Intervention Worker was also being allocated to each school outside of the pilot project. The Committee hoped that the early intervention work

would be successful and developed further. It was noted that a number of pupils at risk of referral previously had intervention from early help services, social care or the youth offending service, and it was suggested that this be kept under review to ensure effectiveness and to identify if families are accessing the right services at the right time.

- 2.59 The Committee compared the council's alternative provision and early intervention work to that of another borough. Whereas Islington focused on early intervention approaches before accepting alternative provision referrals in Key Stage 4, the London Borough of Redbridge offered alternative provision from primary school age onwards alongside targeted early intervention. For reasons of efficiency and quality control, Redbridge delivers all alternative provision through one provider which operates several settings. At primary age children are able to access alternative provision flexibly, whereas several specialist settings are available for secondary school pupils, including a special school, three pupil referral units and an adolescent psychiatric unit. Provisions use wrap-around multi-agency support, including family support workers and the use of specialist mental health support in the form of counsellors and therapists. Redbridge's alternative provision service also offers an outreach service to schools focusing on pupil behaviour. The result of having alternative provision available from an earlier age was that pupils were often able to re-integrate into mainstream school, with 80% of the pupils accessing alternative provision in Key Stage 3 referred back to mainstream school for Key Stage 4. Although the Committee did not suggest that Islington should roll out alternative provision from an earlier age, it was thought that Redbridge demonstrates good practice in effective early intervention and wrap-around support.
- 2.60 The importance of early intervention was recognised by schools, many of which were rolling out their own targeted interventions as detailed elsewhere in this report. New River College particularly emphasised the importance of early intervention and considered that there should be more targeted intervention for families at an earlier stage, suggesting that secondary school age was too late to address pupils' entrenched issues. In consideration of the above evidence the Committee agreed that local agencies should seek to resolve problems as early as possible in a coordinated way as this is more likely to reduce the demand for alternative provision and improve outcomes for the most challenging pupils, but noted the resource implications of this and the importance of securing funding. It is recommended that **the council should continue to develop its wrap-around early help services for pupils at risk of referral to alternative provision in partnership with schools. It should be the aim to provide comprehensive and integrated support to pupils at risk of referral and their families at the earliest possible stage, in order to reduce the need for alternative provision by Key Stage 4.**

3. Conclusions

- 3.1 Overall, the Committee concluded that mainstream school is the best setting for the vast majority of pupils, however appreciated that alternative provision is beneficial for a small number of pupils disengaged from mainstream education. It is hoped that outcomes will be improved through strengthening referral mechanisms and developing the support provided to pupils within alternative provision and those at risk of referral.
- 3.2 The Committee has made fifteen recommendations related to the review objectives. Several of the recommendations are intended to minimise the need for and use of alternative provision. Recommendations have also been made to increase the effectiveness of alternative provision for the pupils who do require this style of education.
- 3.3 In carrying out the review, the Committee met with officers, alternative provision providers, senior school representatives and pupils to gain a balanced view. The Committee would like to thank the witnesses that gave evidence in relation to the scrutiny. The Executive is asked to endorse the Committee's recommendations.

SCRUTINY INITIATION DOCUMENT (SID)
Review: Alternative Provision
Scrutiny Review Committee: Children's Services Scrutiny Committee
Director leading the review: Mark Taylor
Lead Officers: Gabby Grodentz and Jeff Cole
<p>Overall aims of the review:</p> <ul style="list-style-type: none"> • To identify how we can reduce the numbers of children on alternative provision. • To identify how we can ensure that provision is of the highest quality. • To make recommendations to further improve the outcomes, attendance, and accountability for those in alternative provision. • To identify how schools and academies are ensuring the best possible outcomes for the most vulnerable children, including their emotional well-being, and make recommendations about how best practice can be in place in all schools and Academies. • To evaluate the quality, standards and value for money of alternative provision providers, and the range of provision. • To identify how early intervention and 'Think Family' approaches can be mainstreamed once the pump priming funding is no longer available.
<p>How is the review to be carried out:</p> <p>Scope of the Review</p> <p>The review will focus on:</p> <ol style="list-style-type: none"> 1. The national and local context <ul style="list-style-type: none"> • The role and responsibilities of Schools and Academies, and the Local Authority 2. The reasons why children are in alternative provision <ul style="list-style-type: none"> • The profile of AP students including attainment, attendance and other outcomes • Trends in family histories • The child's journey into and through the AP system 3. The local AP arrangements <ul style="list-style-type: none"> • The role of schools • The local method for delivering alternative provision <ul style="list-style-type: none"> - Current AP providers - Current performance - Quality of providers • Funding and value for money

4. Opportunities to make local arrangements more effective

- The use of early intervention (i.e. the new wraparound service, IFIT, approaches used by schools, the demand for therapeutic interventions)
- Strategies to ensure schools take full ownership of children on AP
- Outcomes in individual schools with contextual data such as exclusions

Types of evidence:

1. Documentary evidence including

- Contextual report/presentation
- Anonymised audit of young people in alternative provision
- Case studies
- Government guidance and officer briefing notes
- Service plans, performance indicators and update on impact

2. Witness evidence including

- a. Officer presentations (e.g. IFIT, project lead for new wraparound service)
- b. A range of secondary schools and Academies, and New River College
- c. Effective providers of alternative provision
- d. Other 'good practice' local authorities e.g. Lincoln, Camden's White British Underachievement Project
- e. Young people in alternative provision and their parents

3. Visits

- A local provider of alternative provision, such as New River College.

Additional Information:

Programme	
Key output:	To be submitted to Committee on:
1. Scrutiny Initiation Document	15 September 2015
2. Draft Recommendations	17 May 2016
3. Final Report	28 June 2016

Children’s Services Scrutiny Committee – Work Programme: Alternative Provision

Our role as a scrutiny committee:

- To assess whether the range and quality of provision provides sufficient opportunities for attainment and clear pathways for progression;
- To consider whether accountability – for example by schools and the Council - for those in alternative provision is good enough;
- To review how to keep children in school and the use of Alternative Provision or exclusion as the last resort;
- To consider ways in which identification and early intervention support to pupils and their families, which improves attainment, resilience, empathy, self-awareness, attendance and other related outcomes, could be improved – early identification in education and early support;
- To make recommendations for innovation opportunities.

Focus

<p>Provision quality and range</p>	<p>SID Objective 2. To identify how we can ensure that provision is of the highest quality.</p> <p>SID Objective 5. To evaluate the quality, standards and value for money of alternative provision providers, and the range of provision.</p>
<p>Pupil outcomes and accountability</p>	<p>SID Objective 3. To make recommendations to further improve the outcomes, attendance, and accountability for those in alternative provision.</p> <p>SID Objective 4. To identify how schools and academies are ensuring the best possible outcomes for the most vulnerable children, including their emotional well-being, and make recommendations about how best practice can be in place in all schools and Academies.</p>
<p>Prevention and early intervention</p>	<p>SID Objective 1. To identify how we can reduce the numbers of children on alternative provision</p> <p>SID Objective 6. To identify how early intervention and ‘Think Family’ approaches can be mainstreamed once the pump priming funding is no longer available.</p>

Key questions

- How can pupils be ‘turned around’ before they become disengaged with their education? How can pupils and their parents/carers get the right help to support their needs?
- How do schools and academies retain full responsibility for learners they exclude or place in alternative provision – including the quality of their education and the outcomes they achieve?
- Is there a sufficient range of good or outstanding alternative provision which enables pupils to achieve good educational attainment on par with their peers regardless of circumstances or settings?
- What are the innovation opportunities that could secure better outcomes for this group of young people?

Work programme for alternative provision scrutiny

1. Additional documentation:

- Outcomes in individual schools with contextual data such as attendance and exclusions
- Performance report for current AP providers and value for money
- School referring numbers and demographic information

2. Witness suggestions:

Who	Organisation/remit	Area of focus
Context		
Gabby Grodentz	Islington Council - Head of Alternative Provision	How alternative provision is set up in Islington
Pupil outcomes and accountability		
Sarah Bealey	Schools - Elizabeth Garrett Anderson	Policies and practices of schools; strategies for full ownership of pupils in AP; identifying and enabling pupils to overcome specific personal, social and academic needs; improving engagement with education; enabling good academic attainment; reintegration into mainstream education; partnership working.
Julie Chambers	Schools – Highbury Fields	
Tom Mannion	St Aloysius' College	
Provision quality and range		
John d'Abbro OBE	AP service: New Rush Hall (LB Redbridge)	To provide a comparison with an AP service from another London borough.
Anna Cain	AP provider: The Boxing Academy	Outline of the provision provided to Islington (and other boroughs where relevant); how closely does provision match young people's needs; identifying and enabling pupils to overcome specific personal, social and academic needs; improving motivation, self-confidence, attendance and engagement with education; enable good academic attainment with appropriate accreditation and qualifications; and progression following the placement e.g. further education, employment, training or reintegration into mainstream education
Rebekah Westgate	AP provider: BSix	
Prevention and early intervention		
Nigel Smith	New River College	The role and practices of the New River College PRU.
Anthony Doudle	Islington Council – Head of School Improvement (Primary)	Early identification and intervention opportunities; primary to secondary transition.
Gabby Grodentz Kim Lawson	Islington Council – targeted and specialist early intervention support to pupils and their families: <ul style="list-style-type: none"> • New wraparound service for alternative provision • IFIT 	How schools, young people and parents are supported; what works; early success indicators

3. Work plan

9 November 2015: Witnesses – Provision quality and range		
Who	Organisation/remit	Area of focus
Gabby Grodentz	Islington Council – Head of Alternative Provision	Quality and range of provision in Islington
Anna Cain	The Boxing Academy	
Rebekah Westgate	BSix	

11 January 2016: Witnesses – Pupil outcomes and accountability		
Who	Organisation/remit	Area of focus
Sarah Bealey	Elizabeth Garrett Anderson School	Pupil outcomes and accountability / policies and practices of schools

2 February 2016: Witnesses – Prevention and early intervention / Pupil outcomes and accountability – *Extra evidence meeting*		
Who	Organisation/remit	Area of focus
Julie Chambers	Highbury Fields	Pupil outcomes and accountability / policies and practices of schools
Tom Mannion	St Aloysius' College	
Nigel Smith	New River College	Prevention and early intervention / The role and practices of the New River College PRU.

3 March 2016: Witnesses – Pupil outcomes and accountability / Prevention and early intervention		
Who	Organisation/remit	Area of focus
John d'Abbro OBE	New Rush Hall Group (TBC)	To provide a comparison with the way another borough commissions and delivers alternative provision, the way they work with partners, tackling the issue of schools retaining the responsibility for excluded students including quality of education and outcomes achieved.
Anthony Doudle	Islington Council – Head of School Improvement (Primary)	Early identification and intervention opportunities; primary to secondary transition.
Gabby Grodentz and Kim Lawson	Islington Council – targeted and specialist early intervention support to pupils and families <ul style="list-style-type: none"> • New wraparound service for alternative provision • IFIT 	How schools, young people and parents are supported; what works; early success indicators

4. Scrutiny visits

Who	Organisation/remit	Area of focus	When
Council officers	Council offices	To meet officers supporting the Alternative Provision service and to discuss their views.	18 January 2016
Young people and providers	The Boxing Academy and City and Islington College	To find out about young people's experiences of alternative provision, whether the provision and support was what they needed. How could alternative provision be more effective?	18 March 2016 22 March 2016

5. Key dates

- **12 April 2016:** Notes of scrutiny visits and concluding discussion
- **17 May 2016:** Draft Recommendations
- **28 June 2016:** Final Report