

Cynulliad Cenedlaethol Cymru  
Y Pwyllgor Plant, Pobl Ifanc ac Addysg  
Ymchwiliad i Addysg Heblaw yn yr Ysgol  
EOTAS 27  
Ymateb gan: Ann Keane - EOTAS Grŵp  
gorchwyl a gorffen

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National Assembly for Wales  
Children, Young People and Education Committee  
Inquiry into Education Otherwise than at School  
EOTAS 27  
Response from: Ann Keane – EOTAS Task and  
Finish

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## Introduction

This paper is sent to the Committee in December 2019 by Ann Keane and is a summary of the work of the Education Otherwise than at School (EOTAS) Task and Finish Group between September 2015 and March 2017, when it was replaced by the EOTAS Delivery Group, chaired by Dr Brett Pugh.

In my last *Annual Report* (page 35, pub. 2015) as HMCI at Estyn I drew a comparison between the success of the special school sector and the challenges in the pupil referral unit sector:

‘Since 2010, we have inspected 26 PRUs. A few are excellent, with sector-leading practice. However, for the most part, inspection outcomes are generally worse for PRUs than for any other sector, with half having only adequate or unsatisfactory standards and provision...too many learners remain in PRUs for too long, do not re-integrate into mainstream schooling, do not attend well enough, do not achieve appropriate qualifications or move successfully to further education, employment or training.

This is usually because the quality of teaching varies too much. The curriculum is often limited and uninteresting...Partnerships with other schools are also weak in many cases...In all cases, these features link with shortcomings in leadership and management in the PRU, by the local authority through the PRU’s management committee and officers. There is limited or no professional development for leaders or support for teachers-in-charge...Overall, the provision in too many PRUs fails the vulnerable learners who attend them.’

At the time, around half of children whose education was otherwise than at school were registered at PRUs.

## **The EOTAS Task & Finish Group**

Given the concern I had expressed about this sector while at Estyn I felt that I could contribute positively by accepting the Ministerial invitation to chair the Task & Finish Group being set up in 2015 to identify how to make progress in this troubling sector.

In addition to Estyn's reports on the sector there had been two other influential publications: one a review of the sector commissioned by Welsh Government from Edinburgh University (2012) and the other a report by the Children's Commissioner for Wales i.e. *The Right to Learn – Supporting children and young people at pupil referral units to reach their potential* (2014).

When the Task & Finish Group began its work in September 2015, six key areas for improvement had already been identified in workshops held at previous PRU and EOTAS conferences. These six areas were:

Leadership/Accountability/Resources/Structures/Learner  
Wellbeing/Outcomes

In order to help to focus the work of the group I devised a matrix that could be populated from the recommendations of all the relevant published reviews/reports and which would identify and capture the actions/duties for policy and delivery agencies (see Appendix 1). This was completed by civil servants and provided a starting point for discussion at the meetings where representatives from the sector, from local authorities and consortia as well as HMI were present, supported by a civil service secretariat. In addition to our meetings we held annual EOTAS conferences and circulated an informal paper for Group members to discuss with colleagues in order to test out views and feed back to the Group (see Appendix 2). The fruit of our deliberations and consultations finally appeared in the 2017 *Education otherwise than at school (EOTAS) Framework for Action*. The proposed actions were prioritised/synchronised as short, medium or long-term and related either to specific recommendations in reports or to actions that had been agreed in the T. & F. Group. Several proposals involved the commissioning of further pieces of research or analysis that would be required to inform further thinking, action and/or guidance.

The issues and concomitant actions that mainly concerned us as a Group may be summarised as follows:

- Establishing multi-agency referral panels in all LAs that would ensure that children were placed in a setting and/or with support that met their needs. Managed moves can be informal and undertaken without scrutiny.
- Developing commissioning frameworks and quality assurance arrangements for all non-school, non-PRU settings and provision

whether it is used as part of EOTAS by LAs or by schools as 'alternative provision'.

- Meeting the training needs of staff and management committees.
- Including the sector in pioneering new curriculum and assessment arrangements.
- Standardising pupil and PRU registration practices.
- Improving and standardising the collection of data about pupils (and MIS).
- Developing an appropriate benchmarking framework for evaluating pupil outcomes (one that reflects progress in achievement and improvements in wellbeing).
- Sharing responsibility for accountability metrics with schools from which referrals made whether or not there is dual registration.
- Strengthening curriculum and support links with schools to enhance opportunities for re-integration and joint provision.
- Ensuring that PRUs and EOTAS where appropriate are included in arrangements for consortia support, funding for 21<sup>st</sup> century schools, general professional development (and School as a Learning Organisation) activity.

The Framework for Action reflects these concerns. We also discussed the status of PRUs, which both are and are not schools. In the main the Group favoured a view of PRUs as part of what Estyn describes as a 'continuum of provision' and to retain PRUs within LA control offers greater flexibility in that continuum. However, there was also a strong voice in favour of giving PRUs the autonomy of mainstream schools.

## **Appendix 1**

### **EOTAS matrix for areas and aspects to target (2015 paper)**

Here is a draft outline matrix that can be used to link the 6 areas you have already identified for 'targeted and strategic policy interventions' to aspects and actions for the different agencies involved. This can be used to inform your work plan which sets out actions and milestones for these interventions. The matrix can also be used to check against recommendations from different reviews (Edinburgh, Estyn, Children's Commissioner etc) and against issues raised by the Minister and DfES officials to make sure that everything that WG accepts or would consider accepting can be covered.

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Leadership	Policy						
	Guidance						
	Registration						
	Regulations						
	Governance:						
	of PRUs	Clearer model/ Definition					
	of partnerships						
	Info for pupils/ Parents						

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Resources	Funding model/ formula						
	ITET						
	Staff development						
	Accommodation				Shared	sites	

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Structures/ organisation	Curriculum				Pupils	register jointly	
	Info-sharing						

	Partnership working on the continuum of provision:	Joint DfES approach to NEETS/ Youth Eng Strategy					
	Referrals						
	Exclusions						
	Managed Moves						
	Appeals						
	Reintegration						
	Pathways						

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Outcomes	Tracking progress:						
	credits/ qualifications attained						
	destinations						
	reintegration rates.						
	Record-keeping (behaviour)						
	Reporting						

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Accountability	PIs						
	Standardised National Benchmarking Framework						
	Self- evaluation						
	inspection						

<b>Areas</b>	<b>Aspects</b>	<b>WG</b>	<b>Consortia</b>	<b>LA</b>	<b>School</b>	<b>PRU</b>	<b>Other</b>
Learner wellbeing	Behaviour support						
	ALN support						
	Safeguarding arrangements						
	Learner voice						

Ann Keane  
15.07.15

## **Appendix 2**

### **Education other than at school (EOTAS) task and finish group**

#### **Framework for Action – Discussion Paper – February 2016**

##### **Introduction**

Following a number of reports on PRUs and other EOTAS provision in Wales, the Minister for Education and Skills made it clear that current standards within the sector were not acceptable. The Minister established a Task and Finish Group and invited Ann Keane to take up the position of Chair. The Group has been tasked with developing practical solutions that will deliver improved outcomes and standards of wellbeing and accountability in the sector for pupils and staff alike.

The work of the Group has been divided into two tranches. The first tranche, which began in September 2015, has focussed on PRUs. The second will focus on wider EOTAS provision.

##### **Framework Development**

The Framework seeks to reflect the many and varied views of stakeholders.

In February 2015, the Welsh Government hosted a PRU conference in which six key areas were discussed, and stakeholders were asked to highlight issues and propose solutions. The engagement informed the development of proposals which were then presented at a follow-up conference in November 2015. As before, stakeholders were actively engaged in discussion at dedicated conference workshops and were asked to provide feedback on draft proposals. This feedback has been used to further refine a draft framework, which Task and Finish Group members are now considering.

##### **Framework for Action – PRU stage – FEEDBACK REQUIRED**

The draft proposals set out in this discussion paper are still in development.

The paper is a summary of the actions that are being proposed at this stage. It is being circulated for wider discussion by the sector and for feedback to and by the members of the Task and Finish Group.

All current and further proposals will be subject to agreement by Group consensus and subsequently to agreement by the Minister for Education and Skills.

##### **Proposals**

##### **Short-term work (2016)**

- Welsh Government to commission analysis and evaluation of the access/referral panels operating in local authorities.
- Welsh Government to commission an evaluation of 'best practice' in relation to how pupils are referred to PRUs and how they are reintegrated into mainstream schools.
- Welsh Government to commission WLGA-led analysis of training needs for management committees, PRUs and challenge advisers.
- Welsh Government to explore the feasibility of adapting support material produced by Governors Wales to support the work of management committees.
- Welsh Government to commission analysis of pupil registration practices to enable better data collection.
- Welsh Government to further consider how a more appropriate range of outcomes for EOTAS can be measured and incorporated into a benchmarking framework.
- Welsh Government to continue its work to make the PDG available to pupils in PRUs.
- Welsh Government to review the '21<sup>st</sup> Century school buildings' bidding process to ensure that PRUs are included within local authority bids where this is appropriate.

### **Medium-term work (2016-17)**

- Welsh Government to develop non-statutory, best-practice guidance on how to establish and sustain local authority access/referral panels as well as establishing better referral and integration procedures.
- Welsh Government to consider support arrangements for PRUs and local authorities to make sustainable improvements to resources (staff training, MIS infrastructure, management committee training).
- Welsh Government to explore the options for supporting the tailoring and delivery of specific PRU staff and management training modules.
- Welsh Government to introduce non-statutory guidance on PRU opening and closing procedures.
- Welsh Government to consider the results of the analysis of pupil registration practices and the potential introduction of standardised procedures, which could include increased requirements for dual registration.
- Welsh Government to commission a review of how well the current management committees are working.

### **Long-term work (2017-19)**

The long-term work of the group will be informed by the results of the work undertaken in the short and medium terms.

Initial discussions have indicated that this could include the introduction of primary and secondary legislation that will change the way that EOTAS

services and provision are organised and commissioned currently. Any legislative changes would be accompanied by supporting statutory guidance.

The Task and Finish Group has been asked to discuss the options outlined above and identify issues for inclusion in a final paper to be considered by the group in March 2016.