

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Bil Anghenion Dysgu Ychwanegol a'r Tribiwnlys Addysg (Cymru)| Additional Learning Needs and Education Tribunal (Wales) Bill

ALN 14

Ymateb gan: Estyn

Response from: Estyn

1. The responses contained are largely based on the comments made by Estyn as part of the consultation that ended on 18th December 2015. Where appropriate, they have been amended to reflect the updated Bill, the draft Additional Learning Needs (ALN) code and the information provided by Welsh Government in the technical briefing of December 2016. We welcome the opportunities we have had to work with Welsh Government during the process of developing the Bill and accompanying guidance.
2. Overall, Estyn supports the principles, aims and objectives of the Bill. The ALN code, which was very recently published in draft, will be of vital importance in translating the Bill into practice. Estyn identifies through this response, a number of potential challenges for schools, local authorities and further education institutions (FEIs) in implementing the Bill. We welcome the fact that the Welsh Government has given consideration as to how they can financially support the transition into the new arrangements.

Comments made in relation to specific issues raised by the Bill, in particular:

Whether the Welsh Government's three overarching objectives (listed at para 3.3 of the Explanatory Memorandum) are the right objectives and if the Bill is sufficient to meet these;

Overarching objective (1) a unified legislative framework to support all children of compulsory school age or below with ALN, and young people with ALN in school or further education (FE);

Response:

3. The bringing together of different legislation to cover the 0–25 age range appears largely appropriate. The move towards having a system that runs from 0 to 25 is welcomed, and should ensure a more joined-up approach at different phases of a child/young person's life. However, it is slightly misleading to state the legislation will cover young people up to 25 years of age, when this extends to learners in further education only and excludes those in work-based learning (including apprenticeships), adult community-based learning and those in higher education. Learners in further education are only around a fifth of the total population of 16–25 year olds in Wales.
4. This Bill rightly focusses on learners with special educational needs (to be renamed additional learning needs). NAFW Circular 47/2006 Inclusion and Pupil Support introduced the concept of additional learning needs as a broad umbrella term that covers other groups of vulnerable learners such as those with mental health needs, a medical condition or a disability. It also identifies a range of groups of vulnerable learners who may be at risk of having additional learning needs, including those who are looked-after or those who have English as an additional language. Many schools currently employ ALNCos who oversee the work of both pupils with SEN and also those who fall under the other groups of vulnerable learners. The change in terminology is likely to cause confusion for schools and lead to inconsistency between schools and local authorities. Will current ALNCos lose part of their current role? If so, who will take on these responsibilities? There is a risk that attention will be moved away from these learners. It is essential that guidance should be provided for schools, FEIs and local authorities in relation to these other groups of vulnerable learners.
5. There needs to be a recognition that additional responsibilities relating to learners above the age of 18/19 are likely to increase workloads for local authorities. This is at a time when local authority central services are diminishing. Expectations should be realistic and manageable. Again,

this is something that should be considered in more detail through the ALN code, innovation programme and implementation schedule.

6. Estyn has serious concerns around the capacity and capability of local authorities to extend their statutory duties further. Although ALN services are generally found to be strong in local authority inspections across Wales, there will need to be strong leadership, specialist staff and funding to ensure that a strategic approach is taken towards planning and commissioning of additional learning provision (ALP) for all learners.

Overarching objective (b) an integrated, collaborative process of assessment, planning and monitoring which facilitates early, timely and effective interventions; and

Response:

7. Estyn welcomes the creation of the statutory and recently renamed: Designated Education Clinical Lead Officer (DECLO) and the clarity around the broad functions of the role. The explanatory memorandum (December 2016), para 3.120 makes clear the duty on local health boards or NHS trusts to consider treatments or services that are likely to benefit learners and the need to include such provision in the IDP. Paragraphs 3.121 – 3.123 (inc) provide greater clarity on the role of the DECLO, including provision of services in Welsh and the discretion to inform local authorities regarding children under compulsory school age who have an ALN. The draft ALN code makes it clear that the DECLO's role has a strategic and co-ordinating function. In addition, the DECLO will be responsible for monitoring compliance with the duty to co-operate and measuring the outcomes of health board interventions.
8. We already know that statements of special educational needs include phrases such as "have access to". The impact of these phrases is that both local authorities and schools are protected from non-compliance. However, this can result in children and young people not being able to access services provided by the local health boards with the frequency or intensity needed to meet their needs. This is particularly the case for high incidence needs, such as speech and language therapy and CAMHS.

There is a concern that the DECLO will have limited impact in improving service availability.

9. The DECLO role is currently being piloted in two local health boards. An evaluation of this pilot will inform the development of the role across Wales. Estyn welcomes this approach.
10. Paragraph 3.123 of the explanatory memorandum states that it is only discretionary for the local health board to inform the local authority, if they are of the view that a child who is under compulsory school age has an ALN. Local authorities are better placed to plan provision when they have all available information and it would be helpful that there is strong guidance that this information should be shared.
11. Estyn welcomes the aim to standardise assessment and planning processes, including the use of a single statutory individual development plan (IDP). Overall, the draft Bill provides an appropriate legal framework for the preparation, maintenance and review of IDPs.
12. The final version of the ALN code must provide definitive guidance and support materials such as: exemplar materials including templates, time-lines and flow-charts to practitioners in local authorities, schools and FEIs. The draft ALN code provides overly simplistic flowcharts for schools and FEIs to follow. For example, in considering whether a child or young person has an ALN, no information is provided regarding the role of other services or timeframes that must be adhered to at each stage of the process. The decision to include good practice examples in the draft ALN code is welcomed. However, these would be strengthened considerably by, where possible, providing real-life examples and by adopting a standardised format that focussed on the issues, process followed and outcome.
13. Estyn is encouraged to see the progress being made by Welsh Government in relation to many of the issues raised during the consultation process. For example, we understand that Welsh Government is actively seeking to ensure that personal education plans

for looked-after children and health care plans will be subsumed into the IDP.

14. The roll-out of and the requirement that the person-centred planning model is used as vehicle for capturing the views of children and young people is in keeping with the aim of increasing learner participation in the process. However, it is not clear what impact this requirement will have in relation to capacity of providers to administer this process.
15. The requirement to review IDPs within the 12-month period of starting is in line with current requirements for reviewing statements of special educational needs annually. The Bill places no emphasis on the importance of regular monitoring of IDPs within the 12 month period. The existing SEN code of practice requires that individual education plans (to be replaced by the IDP) are reviewed three times a year.
16. The draft ALN code recognises that the timescales for completion of IDPs stated are based on assumptions, are not fixed and are subject to ongoing discussions. Reducing the timescale for local authorities to assess referrals, including determining whether an ALN exists, from 26 weeks to 10 weeks is likely to place significant additional pressures on local authorities. In the absence of criteria that clearly distinguishes when referrals should be made to a local authority, there is a risk that local authorities will exercise their right under S 12 (2)(b)(ii) of the Act to request that a school prepares an IDP within 5 weeks. This may result in provision being made that is not in the best interest of the child. Alternatively IDPs will be completed within time constraints yet lack the required detail to best support the learner.
17. Although timelines in respect of assessment and issuing IDPs are suggested in the draft ALN code, it may be helpful to include these in the Bill, therefore ensuring that timely provision arising from any identification of need is made.
18. Greater clarity is needed on the assessment process that a provider needs to follow in order to identify whether or not a child or young person has ALN. Currently, schools and between local authorities apply

different thresholds regarding when a child should be placed on a particular stage of the current SEN code of practice. This is an opportunity to improve consistency. It would be helpful to have case studies in the ALN code to show when a pupil should have an IDP or not.

19. The draft ALN code states that both schools and FEIs should “consider consulting an educational psychologist” when they are considering making a referral to the local authority. However, there is no recognition of the role that other specialist support services could have in assisting the school or FEI in identifying appropriate strategies or adaptations that the school or FEI could make to meet the need of the child or young person. Making available the services of educational psychology and/or other specialist support services to the further education sector is likely to put additional resource pressures on local authorities.
20. In order to align differing practices that currently exist in Wales, there is a need to provide unambiguous guidance as to when an IDP becomes the responsibility of the local authority. There is a risk that a lack of agreement over who should produce or maintain an IDP will put pressure on all involved and may result in a delay in making appropriate provision.
21. It is essential that the amount of information required in IDPs is proportionate to the level of need and intervention needed for individual learners. Otherwise, there is a risk that the process will become over-bureaucratic and unmanageable. The draft ALN code provides examples of IDPs. However, it is not clear if these have been provided as a result of proven best practice.
22. Over recent years, there has been a move towards providing for children with a range of needs without producing a statement. This has allowed schools to be more flexible in their use of learning support assistants. It has enabled them to use available resources more effectively, by providing support when it is needed. This has also helped pupils to become less dependent on one individual adult. There is a risk that, if IDPs are too prescriptive about the additional learning provision required, this flexibility will be lost.

23. It is not clear when statements of SEN come to an end or how this will be brought about. This has the potential to cause confusion and anxiety for practitioners and parents.
24. With the removal of statements, there will need to be clear criteria for special schools and, where relevant, local authority specialist classes. There is a risk that places in special schools and specialist classes may be sought for lower levels of ALN than previously. This could be damaging to the work that has been done over many years to promote inclusion.
25. Further information and clarity is needed about what happens where young people in schools or FEIs do not consent to decisions being made in respect of their additional learning need or provision. Under current legislation (The Equality Act 2010), providers have an anticipatory duty to ensure that there is provision and support (reasonable adjustments) made for and available to disabled learners.
26. The draft Bill places a requirement for closer collaboration and working between agencies and providers. The explanatory memorandum goes some way to articulating the advantages for learners that closer working with partners will bring and outlines the respective duties on key agencies. However, the detail as to how these arrangements should work is unclear. There is no mention in the draft Bill or explanatory memorandum and very little detail in the draft ALN Code on the future role of regional consortia in relation to additional learning needs. This is surprising considering the Welsh Government have provided £2.1 m over two years to support the ALN Innovation Fund. The aim of the fund is for regional partnerships to collaborate to devise creative delivery models that improve systems, arrangements and relationships.
27. Currently, 30% of all pupils with SEN in maintained schools are also eligible to free school meals. The educational performance of this group of learners is significantly lower than those pupils with SEN who are not eligible to free school meals. The important role that parents play in supporting the education of their child should not be underestimated.

The Bill and draft code do not make specific reference to the importance of supporting families and how best to do this.

28. There is a need to recognise the importance of partnership working across the stated age range but particularly for those learners who are either pre- or post-statutory school age. The role of, for example, Flying Start and Families First need to be made clearer.
29. The role of the local authority in commissioning post-16 provision will be enhanced. This should bring about a more strategic approach to planning. However, there is a need for further guidance on protocols and commissioning strategies that are needed to ensure effective working partnerships. There is a risk that local authorities will opt for least cost solutions in securing appropriate provision, rather than those that are most appropriate based on cost, quality and match to learners' needs.
30. There is a new requirement for independent schools to register or apply for a material change to accommodate the needs of learners with ALN. The statutory responsibility for delivery of the ALP within an IDP rightly remains with the local authority but the Welsh Government should consider how it can strengthen the requirements for independent schools to deliver ALP in the IDPs of publicly-funded learners through the review of the Independent School Standards (Wales) Regulations which is ongoing.
31. The foundation phase profile will identify where pupils are not making progress. However, there is no single pathway of assessment for pupils who fail to make expected progress. The foundation phase profile guide book suggests that the additional learning needs co-ordinator (ALNCo) will be best placed to know which assessments are appropriate. In general, the draft ALN code needs to provide ALNCoS with guidance on appropriate assessments for the range of ALN they will encounter.

Overarching objective (c) a fair and transparent system for providing information and advice, and for resolving concerns and appeals.

Response:

32. Estyn welcomes extending of the right of appeal to all learners age 0–25 with ALN. However, it notes that Education Tribunal Wales orders will not apply to LHB or NHS trusts. This is a potentially a significant shortcoming, as children and young people may not be able to access the additional learning provision that has been deemed appropriate. This shortcoming exists in the present system and causes frustration for families and local authorities.
33. The Bill maintains the requirement for local authorities to provide independent disagreement resolution. It is important that the ‘independent person’ is appropriately trained and qualified to provide such advice. This should include detailed knowledge of the legislation and processes around additional learning needs. Failure to provide this may be counter-productive.
34. The Bill is unclear regarding independent disagreement resolution for learners in further education. The draft Bill para 37 (4) page 21 states that “...the local authority must take steps which it considers appropriate for making the [advocacy] arrangements to: children and young people for whom it [the local authority] is responsible... As a result, post-16 learners with IDPs that are not maintained by the local authority would not be afforded access to this level of service. This would compromise the concept of protection.

Whether the Welsh Government’s ten core aims for the Bill (listed at paras 3.5 3.16 of the Explanatory Memorandum) are the right aims to have and if the Bill is sufficient to achieve these;

Response:

35. The ten core aims appear appropriate in supporting the overarching objectives. The responses contained in this paper address many of the core aims. For ease of reference, these are repeated where relevant below with any additional comments.

Core aim one: The introduction of the term Additional Learning Needs (ALN):

36. The new definition of ALN is broadly in-line with the current definition for SEN. The definition 2 (2) (a) of the draft Bill, would be strengthened if it read "...has a significantly greater difficulty in learning, or *aspects of learning than...*" as opposed to "...has a significantly greater difficulty in learning..."
37. It is essential that providers should have a clear understanding of what is meant by ALN, particularly as the term ALN currently refers to a broader group of vulnerable learners. Guidance on this should be provided in the ALN Code.

Core aim five: High aspirations and improved outcomes

38. Of the 221 inspections undertaken during 2015–2016, all of the pupil referral units (4 inspected), half of maintained special schools (6 inspected), just under a fifth of secondary schools (33 inspected) and very few primary schools (178 inspected) were judged adequate or less for the care, support and guidance they provided. In these schools, the identification of pupils’ needs was poor. Individual education plans (IEPs) were vague and parents were not well informed on targets for improvement. Teachers and support staff did not sufficiently meet the needs of learners in class as a result there was little impact on pupil standards. In addition there was a lack of leadership provided by the SENCO/ALNCo and a lack of clarity in working with partners. Our inspections suggest that there is a need for improved outcomes.
39. During the period 2015–present, independent living skills (ILS) departments have been inspected in four FEIs. ILS departments provide learning opportunities for learners with a variety of learning needs, including pupils with profound and multiple learning disabilities, speech, communication and language needs and learners with autism. The inspection outcomes for ILS departments in the FEIs inspected is shown below.

FEI	Key Question One: Standards	Key Question Two: Provision	Key Question Three: Leadership
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Bridgend College	Adequate	Adequate	Unsatisfactory
Cardiff and the Vale College	Adequate	Adequate	Adequate
Coleg Cambria	Adequate	Adequate	Unsatisfactory
Merthyr Tydfil College	Published in March	Published in March	Published in March

40. The main shortcomings identified include: initial assessments that do not reflect the full range of learners' needs and abilities, targets for learners do not reflect sufficiently their needs and abilities and systems to track learner progress are underdeveloped. Overall, learning experiences do not meet individuals' needs well enough. Learners have a limited range of classroom experiences with few opportunities for them to develop practical or vocational skills. Where leadership is unsatisfactory, there is no clear vision that is based on current and future needs of learners and there is a lack of opportunities for staff to develop their understanding of the specific needs of learners.

41. The paragraphs above outline the challenges faced by FEIs in meeting the needs of the most vulnerable learners. As budgets for S140 learners are delegated to local authorities, it is likely that FEIs will be expected to provide for a broader range of ALN needs and higher level of challenge from learners than they currently face. Estyn is concerned around the capacity of FEIs to meet this challenge to meet the needs of learners with the most complex needs.

42. High aspirations and improved outcomes for learners with ALN cannot be achieved if pupils fail to attend, are disproportionately excluded or where approaches used in teaching are not sufficiently tailored to the needs of learners. Pupils with special educational needs are more likely not to attend school. Persistent absence for primary pupils with SEN is 12 times

greater than pupils without a SEN and 8 times greater in secondary schools. The permanent exclusion rate for pupils with SEN is 10 higher than pupils without a SEN and 10 to 15 times higher for pupils with SEN who have a fixed term exclusion.

43. The performance of pupils with SEN, at key stage 2, 3 and 4 has improved year on year for the past seven years and the gap in performance of pupils with SEN has also been reducing. However, there remain significant differences in performance of pupils with SEN at Level 2 (inclusive), compared to pupils with no SEN. In 2015, 23.3% of pupils with a SEN attained the Level 2 (inclusive), compared with 58.9% of pupils without a SEN. Estyn recognises that it is highly unlikely and an unreasonable expectation that pupils with certain SEN types attain expected levels at the end of key stage. However, there are significant differences in the performance of pupils with SEN between the Level 2 and Level 2 (inclusive) measure.
44. Many pupils who attend education other than at school (EOTAS) currently have a special educational need and around 31% have statements of special educational needs. Attainments and meeting the SEN needs of these pupils have been generally poor. Changes to the curriculum and performance measures are likely to make it more difficult for the attainments of pupils with SEN to be visible.
45. Standards by SEN need and phase of education, % attaining L2 and L2+ at key stage 4 – 2015 (source: Academic Achievement by pupil characteristics, 2015):

	KS4	
	L2	L2+
Cognition and Learning		
SpLDs		
Dyslexia	80.6	38.3
Dyscalculia	*	*
Dyspraxia	81.4	52.5
ADHD	58.5	21.5
MLD	66	13.8
GLD	71.8	23.4
SLD	*	*
PMLD	9.3	*
BESD	61.1	26.1
Communication and Interaction		
SCLD	*	*
ASD	64.6	41.7
Sensory/Physical		
HI	97.4	63.1
VI	*	*
MSI	*	*
PMed	83.1	51.7

The

provisions for collaboration

and multi-agency working, and to what extent these are adequate;

46. The draft Bill certainly places a requirement for closer collaboration and working between agencies and providers and the explanatory memorandum goes some way in articulating the advantages for learners that closer working with partners will bring and outlines the respective

duties on key agencies. However, the detail as to how these arrangements should work is unclear. There is no mention in the draft Bill or explanatory memorandum and very little detail in the draft ALN code on the future role of regional consortia in relation to additional learning needs.

47. There is a need to recognise the importance of partnership working across the stated age range but particularly for those learners who are either pre-statutory or post-statutory school age. The role of, for example, Flying Start and Families First needs to be made clearer.
48. The important role that parents play in supporting the education of their child should not be underestimated. The Bill and draft code does not make specific reference to the importance of supporting families and how best to do this. Currently 30% of all pupils with SEN in maintained schools are also eligible to free school meals. The educational performance of this group of learners is significantly lower than those pupils with SEN who are not eligible to free school meals.
49. The role of the local authority in commissioning post-16 provision will be enhanced. This should bring about a more strategic approach to planning. However, there is a need for further guidance on protocols and commissioning strategies that are needed to ensure effective working partnerships. There is a risk that local authorities will opt for least cost solutions in securing appropriate provision, rather than those that are most appropriate based on cost, quality and match to learners' needs.

Whether there is enough clarity about the process for developing and maintaining Individual Development Plans (IDPs) and whose responsibility this will be;

50. Estyn welcomes the aim to standardise assessment and planning processes, including the use of a single statutory individual development plan (IDP). Overall, the draft Bill provides an appropriate legal framework for the preparation, maintenance and review of IDPs.

51. In order to align differing practices that currently exist in Wales, there is a need to provide unambiguous guidance as to when an IDP becomes the responsibility of the local authority. There is a risk that a lack of agreement over who should produce or maintain an IDP will put pressure on all involved and may result in a delay in making appropriate learning provision.
52. The draft ALN code recognises that the timescales for completion of IDPs stated are based on assumptions, are not fixed and are subject to ongoing discussions. It may be helpful to include these in the Bill, therefore ensuring that timely provision arising from any identification of need is made. The draft ALN code provides overly simplistic flowcharts for schools and FEIs to follow which do not provide any more detail than the definition of ALN in the Bill. It would be helpful to have case studies in the ALN code to exemplify when a pupil should have an IDP or not.
53. The requirement to review IDPs within the 12-month period of starting is in line with current requirements for reviewing statements of special educational needs annually. The Bill places no emphasis on the importance of regular monitoring of IDPs within the 12 month period.
54. Over recent years, there has been a move towards providing for children with a range of needs without the need for a statement. This has allowed schools to be more flexible in their use of learning support assistants. It has enabled them to use available resources more effectively, by providing support when it is needed. This has also helped pupils to become less dependent on one individual adult. There is a risk that, if IDPs are too prescriptive about the additional learning provision required, this flexibility will be lost.
55. It is essential that the amount of information required in IDPs varies according to the level of need and intervention for individual learners. Otherwise, there is a risk that the process will become over-bureaucratic and unmanageable. The draft ALN code provides examples of IDPs. However, it is not clear if these have been provided as a result of proven best practice.

56. It is not clear when statements of special educational needs come to an end or how this will be brought about. This will cause considerable concern for practitioners and anxiety for parents, particularly where parents are being advised that the current SEN legislation no longer applies.

Whether Bill will establish a genuinely age 0–25 system;

57. The bringing together of different legislation to cover the 0–25 age range appears largely appropriate. The move towards having a system that runs from 0 to 25 is welcomed, and should ensure a more joined-up approach at different phases of a child/young person's life. However, it is slightly misleading to state the legislation will cover young people up to 25 years of age, when this extends to learners in further education only and excludes those in work-based learning (including apprenticeships), adult community-based learning and those in higher education. Learners in further education are only around a fifth of the population of 16–25 year olds.

58. There needs to be a recognition that additional responsibilities relating to learners above the age of 18/19 are likely to increase workloads for local authorities. This is at a time when local authority central services are diminishing. It is essential that expectations are realistic and manageable. Again, this is something that should be considered in the ALN code, innovation programme and implementation schedule.

59. Estyn has serious concerns around the capacity and capability of local authorities to extend their statutory duties further. Although ALN services are generally found to be strong in local authority inspections across Wales, there will need to be strong leadership, specialist staff and funding to ensure that a strategic approach is taken towards planning and commissioning of additional learning provision (ALP) for all learners.

The capacity of the workforce to deliver the new arrangements;

60. Around 23% of pupils in schools in Wales are on the SEN register and this has remained reasonably constant over the past few years. However, there have been noticeable increases in pupils being identified with

autistic spectrum disorders, general learning difficulties and attention deficit hyperactivity disorder.

61. The Welsh Government commissioned and published two reports: (a) “An assessment of SEN workforce development requirements”, and (b) “Workforce planning for SEN specialist services”. Amongst other issues, the reports noted that:

- There are gaps in staff SEN knowledge and skills, particularly in relation to assessment and differentiation.
- Initial teacher training may not equip staff with the skills that are needed.
- Specialist services may need to change their focus from assessment to capacity building.
- Initiatives such as Flying start and Communities First are increasingly being used to support pupils with SEN
- Succession management is not strong with little spare capacity across services. Resources have been either frozen or cut despite increasing demand.
- The ability to provide services through the medium of Welsh is variable.
- There are different workforce planning frameworks in LA and NHS and neither is particularly effective.
- Regional solutions, including provision may generate efficiencies and reduce demand on individual service areas.

62. Paragraphs 3.36 to 3.41 of the explanatory memorandum outline the measures taken by Welsh Government to address a majority of the issues identified in the reports. This includes developing a three-tier model to develop the knowledge, understanding and skills for all teaching practitioners. This development is being aligned to wider school improvement and staff development strategies and includes the intention to develop a Masters level qualification for ALNCOs. Estyn welcomes these developments and the bespoke training programmes that raise the awareness of autistic spectrum disorders. However, Estyn understands that local authority commitment to implement such training is variable across Wales.

63. The draft ALN code recognises the importance of adapting teaching methods and resources to the needs of pupils. However, it offers no specific guidance or signposting on how this can be achieved to accommodate the range of additional learning needs that teaching professionals will encounter. Estyn welcomes that assertion that training and development opportunities for staff need to be identified as part of the provider's planning processes.

64. Other than the creation of two new statutory roles, the Designated Education Clinical Lead Officer (DECLO) and the ALNCo, the draft Bill makes no direct references to capacity of workforce matters. A growing concern of practitioners relates directly to administering the process of IDPs in addition to current workload.

The proposed new arrangements for dispute resolution and avoidance.

65. Estyn welcomes extending of the right of appeal to all learners age 0–25 with ALN. However, it notes that Education Tribunal Wales orders will not apply to LHB or NHS trusts. The Bill maintains the requirement for local authorities to provide independent disagreement resolution. Estyn is of the view that the “independent person” is appropriately trained and qualified.

66. The Bill is unclear regarding independent disagreement resolution for learners in further education. Clarification is needed on whether post-16 learners with IDPs that are not maintained by the local authority will be afforded the same level of service.