
INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales. The three national park authorities and the three fire and rescue authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The WLGA is pleased to be able to respond to the National Assembly for Wales (NAfW) Children, Young People and Education Committee inquiry into the range of *Education Otherwise than at School (EOTAS) provision, including Pupil Referral Units*. This response has been informed by the knowledge and expertise of the Association of the Directors of Education in Wales (ADEW). As such this is a joint consultation response on behalf of the WLGA and ADEW and represents the collective views of the 22 local authorities in Wales.
4. Ensure direct communication between Welsh Government (WG), Estyn and Units Pupil Referral (PRUs) has been influential in informing policy and informing policy makers around issues including education other than at school (EOTAS) Review, grant funding, curriculum and the additional learning needs (ALN) reform. A key outcome of the work of the group has been the sharing of excellent practice. As a direct result, members of the group have run several conferences for PRU staff across Wales in the last year with regional consortia, local authorities (LAs), WG and Estyn's support and involvement, which have had a positive impact on enhancing the skills and knowledge of staff working in the sector, in addition to supporting issues such as well-being and staff morale.

Key areas of discussion during meetings:

- The implementation of the Curriculum for Wales 2020
- ALN reform, staff and learner wellbeing
- Improving outcomes for learners who are EOTAS through improved staff training and development, assessment and tracking linked to the progress of pupils in EOTAS provision and outreach support for hard to reach learners
- inspection of EOTAS provision
- The changing cohort of learners accessing specialist provision.
- Registration processes for EOTAS learners
- PRU Management Committees, the new Management Committee Handbook

Key Outcomes:

- Improved recognition of PRUs by WG at strategic level and policy level - this has resulted in specific recognition of the sector in planning for the new curriculum, in the implementation of the ALN Reform Act and in the devolving of grant monies for pupils. the agenda alongside schools where appropriate. PRU Headteachers now sit on the Estyn Headteacher Reference Group, Estyn National Stakeholders Group and the WG EOTAS Advisory Group. This will ensure that there is appropriate representation at all levels to inform policy and practice in relation to EOTAS provision moving forward
- Improved trend in standards identified through Estyn inspections in the last 18 months.
- Improved communication within and across the sector
- Improved collaboration and partnership work within and across the sector - a number of Headteachers within the group have visited other PRUs in Wales and some in England to observe good practice. Collaboration, sharing of practice and some pooling of financial resources have taken place to enable PRUs to provide appropriate training and development for staff.
- WG and Estyn have been an integral part of the group, sharing updates with their colleagues in WG and Estyn. Both have made sure that Pupil Referral Units are on
- Bespoke and targeted training through joint conferences led by the sector, for the sector

Key issues and Concerns

- Impact of the implementation of the ALN Reform Act including potential impact of individual development plans (IDPs) moving from school responsibility to LA responsibility when a pupil transitions to the EOTAS sector. The concern is that this could be an incentive to exclude pupils or refer to EOTAS provision
- Impact of rising trend of pupils with extremely high levels of need and demonstrating high levels of aggressive and violent behaviour in the sector
- Impact of rising numbers of pupils with ASD diagnosis and average to above average cognitive ability who do not fit conventional special school provision criteria being referred to the sector
- Whilst it has been applauded that Estyn now have a representative from the sector on their stakeholder group, there were concerns that this was only 1 person from across the whole of Wales.
- Lack of representation from the sector in shaping the new curriculum
- Concerns re the potential impact of changes to the registration of pupils who are EOTAS and the implications for the management of data/funding/joint working
- Concerns about the validity and accuracy of benchmarking due to the range of provision and differences in Local Authority policy, protocols and provision
- Whilst there have been significant improvements in ensuring pupils who are EOTAS and staff who work within the sector are not disadvantaged by funding arrangements, there are still issues with PRUs being overlooked. For example, the funding for the professional learning grant was awarded much

too late in the financial year in 2019/20, the period poverty grant did not cover pupils in EOTAS provision etc.

- Recruitment of high quality staff to the profession is a challenge. There is little or no opportunity for professional development in the sector at ITT or as an NQT and staff working in the sector are unable to participate on the GDP to qualify as a teacher while they work.