

NNPCF Response

SEND Reform: Education Otherwise Than at School

Overarching position

NNPCF supports the ambition for children and young people to receive high-quality education, earlier support and stronger oversight. However, consistency must not be achieved by reducing individualisation or statutory protection. Children receiving EOTAS are often those for whom conventional systems have already failed. Reform must therefore strengthen accountability and access to suitable education, rather than create new thresholds, cliff edges or routes through which children can be left without provision.

A cross-cutting issue raised strongly in the evidence is the need to retain personal budgets and direct payments explicitly within the reformed EOTAS system. For many families these are central to flexibility, continuity with trusted providers and the ability to build genuinely bespoke packages.

Q1. How can we best support the needs of children and young people who are not eligible for a Specialist Provision Package but are unable to continue their education in a formal setting?

There must be no gap in entitlement for children and young people who are unable to access education in a formal setting but do not meet the threshold for a Specialist Provision Package.

PCF feedback highlights significant concern that tying EOTAS exclusively to SPP eligibility could leave children whose needs make attendance inappropriate without a suitable route to education. This is particularly relevant for children experiencing anxiety-based non-attendance, sensory overwhelm, mental health needs and other complex barriers to attendance.

Section 19 must remain an effective statutory safety net, but this requires clear national expectations, timely decision-making and accountability. Children should receive suitable education while longer-term arrangements are considered and should not be left without education while agencies debate responsibility.

Support must be needs-led, flexible and capable of including face-to-face tuition, online provision, therapeutic support, community-based provision and other appropriate arrangements.

Crucially, inability to meet an SPP threshold must never be treated as evidence that a child can attend school. These are separate questions. Decisions should consider what environment the child can meaningfully access and what provision will enable them to progress.

Q2. Which approach to commissioning and overseeing EOTAS arrangements do you think would work best?

Option selected: Another approach

Proposed: A genuinely shared model with clear statutory accountability, without a blanket requirement for every child or young person receiving EOTAS to be linked to a named school or further education setting.

PCF feedback does not provide confidence that responsibility should transfer wholly to a named school or further education setting.

EOTAS frequently follows placement breakdown, unmet need, school-related distress and loss of trust between families and settings. PCFs therefore question whether requiring every child or young person receiving EOTAS to be linked to another setting, potentially one unfamiliar with them, necessarily brings decision-making closer to the child or improves accountability.

We support a genuinely shared model. The local authority should retain clear statutory accountability to ensure the provision outlined in the SSP/EHCP/ISP is secured, alongside responsibility for strategic commissioning and oversight.

A named setting could coordinate aspects of day-to-day provision where this is appropriate and agreed, but this should not be an automatic requirement. Any such arrangement should be co-produced with the child or young person and their parent carers, and only where the setting has the necessary expertise, capacity and relationship to undertake the role effectively.

Particular safeguards are needed where EOTAS follows placement breakdown or trauma, and where linking provision to a setting risk disrupting trusted professionals, established providers or a bespoke package that is already working.

There must be one clearly identified lead professional and no ambiguity about accountability when provision fails.

The model must also retain access to personal budgets, direct payments and bespoke providers, and avoid financial or administrative incentives for premature reintegration.

Q3. Under your preferred approach, what support, capacity or safeguards would be needed to enable the named school or further education setting and/or local authority to undertake their roles effectively?

Any organisation responsible for overseeing a reformed EOTAS framework will require dedicated capacity, expertise and funding. This cannot simply be added to existing schools, AP, FE or local authority responsibilities without additional resource, training and clear accountability.

Under NNPCF's preferred shared model, the local authority should retain statutory accountability, while any involvement of a named education setting should be based on the individual circumstances of the child or young person rather than being an automatic requirement.

Where a setting is named, it must have the capacity, training and expertise to undertake the role effectively. Placing responsibility across a wide range of individual settings risks creating variable practice, access and provision depending on the capacity and expertise of the setting involved. This could result in further inequity for children and young people. For this reason, NNPCF believes that overarching responsibility and accountability should remain with the local authority, providing greater consistency across the local area, while allowing operational coordination to sit closer to the child where this is appropriate.

Where a setting is involved in coordinating or overseeing aspects of EOTAS, there should be nationally defined expectations covering safeguarding, commissioning, procurement, quality assurance, therapeutic provision and understanding of need, including autism, sensory processing differences, anxiety and emotionally based barriers to attendance.

Every child or young person should have an appropriately trained and named coordinator who knows them and their family. This role does not necessarily need to be sat within an education setting. Families describe high staff turnover and large caseloads as significant barriers within the existing system.

Children, young people and parent carers must be genuine partners in commissioning, reviewing and changing provision, including any decision about whether a named setting should be involved.

Particular safeguards are needed where EOTAS follows placement breakdown, trauma or loss of trust. Families should not be required to work through a setting that is inappropriate, including another setting within the same multi-academy trust where this could recreate previous difficulties or undermine progress.

There should also be safeguards against conflicts of interest where the organisation funding, administering or overseeing EOTAS is simultaneously determining whether it should continue or whether reintegration should take place.

Funding must follow responsibility, and there must be clear escalation and enforcement arrangements where provision specified within an SPP, EHCP or ISP is not delivered.

Q4. What safeguards should be in place to support consistent, needs-led decisions about when Education Otherwise Than At School (EOTAS) is the most appropriate way to meet a child or young person's needs, including where suitable school or further education provision may be limited or unavailable?

A clear national decision-making framework is needed to reduce the significant variation families currently experience.

Decisions must be based on the individual child's needs and circumstances, not local availability, cost or whether a suitable placement happens to exist.

There should be transparent national criteria, meaningful participation of children, young people and parent carer, consideration of relevant professional evidence and multi-agency decision-making where appropriate.

The system must clearly distinguish between cases where education outside a setting is genuinely the most appropriate way to meet a child or young person's needs, and cases where EOTAS is being considered because suitable local provision is unavailable. Decisions must always remain centered on the individual child or young person, their needs, circumstances and outcomes. Where those needs could appropriately be met within a formal setting, but no suitable provision is available, this should be recognised as a local sufficiency and strategic commissioning issue rather than being attributed to the child or young person, or their families.

Local authorities should be expected to plan and commission provision in line with the needs of their local population, with clear accountability where this is not achieved. These cases should be transparently identified and monitored so that EOTAS is not used to mask gaps in local provision, while ensuring that children and young people still receive suitable education without delay.

There should be independent scrutiny or moderation of decisions to reduce postcode variation and a clear route to challenge decisions. National data should also distinguish why children receive EOTAS, including where lack of suitable provision contributed to the decision.

The child's current provision should continue while disagreements or reassessments are resolved wherever removing it would otherwise leave them without suitable education.

Q5. What factors are important for effective reintegration planning for children and young people receiving EOTAS provision?

Reintegration must be an individual, outcomes-led process rather than an expectation attached to EOTAS.

Planning should begin with the child or young person's needs, wishes, wellbeing and readiness, alongside the views of parent carers, and the professionals who know them well.

Important factors include trust, continuity of relationships, a genuinely suitable receiving setting, evidence that the setting can meet need, appropriately trained staff, reasonable adjustments, gradual familiarisation and the ability to increase or reduce attendance flexibly.

Previous experiences must be properly understood. For some children and young people, previous school experiences have resulted in significant anxiety, distress and loss of trust. Reintegration cannot succeed simply by identifying a school place. This should also include recognition that parent carers may themselves have experienced significant distress, trauma or loss of trust as a result of previous experiences with education and the wider system. Restorative, relationship-based practice may therefore be needed with the whole family, not only the child or young person.

Rebuilding trust with parent carers is important because effective reintegration depends on honest communication, shared confidence in the plan and genuine co-production. Where parent carers remain

fearful that previous experiences will be repeated, this can understandably affect the family's confidence in the proposed placement and, in turn, the child or young person's sense of safety and readiness to engage.

The professionals currently delivering successful EOTAS provision should be involved in planning and, where possible, support transition.

Reintegration should be closely monitored and reviewed over time, with a clear route to pause, reduce or reconsider the arrangement where it is not working. This must include consideration of whether a return to EOTAS, in full or in part, would better meet the child or young person's needs.

Success must not be measured by attendance alone. A child or young person may be physically attending a setting while experiencing significant deterioration in their emotional wellbeing, mental health, regulation, relationships, engagement with learning or functioning outside education. These wider impacts must form part of any assessment of whether the placement is genuinely appropriate and sustainable.

There should be no assumption that reintegration should occur by a predetermined date or continue simply because attendance has increased. Some children or young people will progress towards school or FE; others may continue to achieve better outcomes through EOTAS or a blended arrangement.

Any decision to continue, reduce or reverse reintegration should be made carefully, with the child or young person's best interests, wellbeing and long-term outcomes at the centre, and with meaningful involvement of the child, family and professionals who know them well.

Q6. What safeguards are needed to ensure reintegration planning best supports progress and long-term outcomes?

Reintegration should occur only where it is demonstrably in the child or young person's interests and there is clear evidence that the receiving setting can meet their needs.

There should be a written, co-produced transition plan setting out agreed outcomes, reasonable adjustments, timescales, responsibilities, review points and what will happen if the transition becomes difficult or begins to affect the child or young person's wellbeing.

Readiness decisions should involve the child or young person, parent carers, current providers and relevant professionals. They should not rest solely with an organisation that may have a financial or administrative interest in ending EOTAS.

Safeguards should also recognise that both children and young people and their parent carers may have experienced significant distress, trauma or loss of trust as a result of previous education experiences. Where this is the case, restorative and relationship-based practice should form part of reintegration planning so that trust is rebuilt before expectations are increased. This is important not only for parent carer confidence, but because a child or young person's sense of safety and readiness can be affected by the confidence and trust of those supporting them.

Children and young people should be able to pause, slow down or step back from reintegration without automatically losing their EOTAS provision. A transition that does not succeed should generate learning, review and reassessment, not blame or a presumption that the child or family has failed.

Funding and existing support should overlap during transition rather than ending abruptly. There should be a clear route back to EOTAS, in full or in part, where evidence shows that reintegration is not meeting need.

Progress must not be measured by attendance alone. Review should consider emotional wellbeing, mental health, regulation, engagement with learning, relationships, functioning outside the setting and the sustainability of attendance over time.

There should also be explicit recognition that reintegration will not be appropriate for every child or young person. Regular review should ask whether current arrangements continue to meet need, rather than beginning from an assumption that the objective is always to end EOTAS.

Q7. What arrangements are needed to provide parents with a clear route to resolve disputes if decisions are made: about whether new EOTAS provision should be put in place; or to change or cease EOTAS provision that has already been put in place?

This is one of the areas of greatest concern within the feedback received by NNPCF.

Families need access to a genuinely independent, timely and legally enforceable route to challenge decisions about whether EOTAS should begin, continue, change or cease.

An early review of the SSP, EHCP or ISP can be useful, but it must be a meaningful review of the child or young person's current needs and circumstances, not simply a reconsideration of existing paperwork. Careful consideration should be given to the age and relevance of the evidence being relied upon. Where reports or assessments are out of date, or where needs or circumstances may have changed, further assessment should be obtained before significant decisions are made about EOTAS.

The review should involve the child or young person, parent carers, current providers and relevant professionals, with clear reasons provided for any decision.

High-quality, independent mediation should also be available at an early stage. Mediation must be genuinely impartial, delivered by practitioners with appropriate SEND and EOTAS knowledge, and focused on resolving the substantive disagreement rather than simply completing a procedural step.

However, neither an early review nor mediation is an adequate substitute for independent legal redress. NNPCF feedback strongly supports retaining a specific route to the SEND Tribunal where disagreement concerns whether EOTAS is required. Families should not lose an existing safeguard simply because EOTAS provision is reorganised within Specialist Provision Packages or Individual Support Plans.

There should also be clear timescales for decisions and disputes, access to independent information, advice and advocacy, and continuity of existing provision while disputes are resolved where removing provision would leave the child or young person without suitable education.

The emphasis should be on resolving disagreements as early as possible, but review, mediation and Tribunal rights should form a complementary system of safeguards rather than one replacing another.

Q8. Do you agree or disagree that non-school alternative provision delivering EOTAS special educational provision to children of compulsory school age should be required to comply with new national regulatory standards?

Multiple Choice: Yes, I agree

Yes, the NNPCF agrees with proportionate safeguards.

PCFs broadly support stronger national minimum standards for provision of delivery of EOTAS. Children receiving education outside school should have consistent protections around safeguarding, suitability and quality.

However, regulations must be proportionate. EOTAS packages are often deliberately bespoke and may include small providers, individual tutors, community activities, therapies, sports, outdoor learning and other provision that cannot reasonably be regulated in exactly the same way as a large alternative provision provider.

A regulatory framework should therefore distinguish between core education providers and complementary elements within an individual EOTAS package.

The framework must not inadvertently remove small, trusted providers simply because they cannot manage disproportionate administrative requirements.

National standards should establish a strong safeguarding and quality floor while retaining sufficient flexibility to design provision around individual needs.

Implementation should include support and proportionate routes for small providers to meet requirements rather than creating a market dominated by large organisations.

Q9. Do you agree or disagree that local authorities should be responsible for quality assuring non-school alternative provision delivering special educational provision EOTAS for children of compulsory school age?

Multiple Choice: Neither agree nor disagree.

Yes, we agree that there should be quality assurance, but NNPCF has concerns about it being undertaken *solely* by the local authority.

NNPCF supports robust quality assurance, but PCF feedback raises concerns about relying exclusively on local authorities to undertake this function, without a clear route of redress.

Families already experience significant variation between local areas. A system in which each local authority interprets and applies national standards differently risks perpetuating the postcode variation reforms are seeking to address.

There should therefore be a national framework with consistent criteria, proportionate application and independent oversight of how local authorities perform their quality-assurance function.

Families and providers should also have access to a regional or national escalation route where they believe quality assurance is being applied inconsistently or inappropriately by a local authority.

Approved-provider arrangements must not become overly restrictive. EOTAS works precisely because provision can be tailored around an individual child, including small or highly specialist providers.

Local authorities could undertake quality assurance, but this should operate within nationally consistent arrangements and be independently auditable.

There must also be a timely and transparent route for approving new provision and resolving disputes about existing or proposed provision. Administrative delays, disagreement between organisations or prolonged decision-making must not result in a child or young person losing access to suitable education or support.

Q10. For young people aged 16-25, should quality assurance and oversight arrangements of EOTAS provision align with the approach proposed for children of compulsory school age?

Multiple Choice: The quality assurance arrangements should be different

The same fundamental safeguarding and quality expectations should apply to young people aged 16-25, but the framework must reflect the very different context of preparation for adulthood.

Quality should not be measured primarily through school-age academic indicators. Appropriate outcomes may include independence, communication, life skills, employment, supported internships, community participation, wellbeing and preparation for adulthood.

The young person's views and aspirations should also carry increasing weight.

This is particularly important because section 19 does not provide the same route post-16, making EOTAS within an SSP/EHCP/ISP especially important for some young people.

A consistent safeguarding floor across all ages is appropriate, but quality assurance for 16-25 provision needs sufficient flexibility to recognise very different pathways and destinations.

The system must not inadvertently reduce access to innovative community, employment or independence-focused provision simply because it does not resemble school-based education.

Q11. When should assessment take place, if at all, for children and young people on existing EOTAS arrangements?

Multiple Choice A different approach should be taken.

NNPCF does not support automatic reassessment simply because a child reaches a predetermined phase transition.

For children and young people receiving EOTAS, the concept of a traditional school phase transition may have limited relevance. Where provision is stable, meeting need and supporting progress, mandatory reassessment can itself create significant anxiety and uncertainty, particularly where a child or young person may only recently have transitioned into a successful EOTAS arrangement. Reassessment at that point could create unnecessary distress for both the child or young person and their parent carers.

For some children and young people, a change of key stage may provide an appropriate and useful point for a more detailed review of needs and provision. However, this should not be automatic. For others, particularly where EOTAS is relatively new, stable and working well, a key stage transition may have little practical relevance and could create unnecessary disruption or anxiety.

The strongest concern expressed by families is the risk of a Year 6/7 cliff edge, whereby successful arrangements are reconsidered primarily because the child has reached a particular age or phase of education.

Stability and continuity should therefore be given significant weight. Any reassessment must consider why the existing arrangement is working, rather than treating improved wellbeing or progress as evidence that the support producing that improvement is no longer required.

Assessment should instead be triggered where there is evidence of a material change in need or circumstances, where the existing arrangement is no longer achieving agreed outcomes, where new suitable options become available, or where the child, young person or parent carer requests reconsideration. The timing and scope of any reassessment should ultimately be determined by the individual child or young person's needs, circumstances and outcomes, rather than by age or educational phase alone.

Q12. If a needs assessment takes place and a child of primary age is assessed as eligible for an EHCP, do you agree that they should move onto a Specialist Provision Package, with any EOTAS arrangements managed in line with the proposals set out in Chapter 1?

Multiple Choice: Neither agree nor disagree

NNPCF's position depends on the final design of Specialist Provision Packages and, critically, the safeguards around how EOTAS would operate within that framework.

We could support a child moving onto an SPP where this provides a clear statutory framework around their assessed needs and outcomes. However, an SPP must be a mechanism for securing appropriate provision, not a reason to dismantle an EOTAS arrangement that is already successfully meeting the child's needs.

Where assessment confirms continuing need for an EHCP and EOTAS remains appropriate, there should be a strong presumption of continuity. Existing provision, trusted relationships, personal budgets, direct payments and bespoke providers should be retained unless there is clear evidence that change would better meet the child's needs and improve outcomes. This is consistent with NNPCF's wider position that reform should strengthen individualisation and statutory protection rather than create new cliff edges.

NNPCF would also not support an assumption that moving onto an SPP means EOTAS must automatically be managed through a named school or education setting. As set out in our response to Questions 2 and 3, local authorities should retain overarching statutory accountability, and involvement of a named setting should depend on the individual child's circumstances, with the agreement and meaningful involvement of the child and their parent carers.

The SPP must be built around the child's assessed needs rather than requiring the child to fit predetermined provision or an approved-provider model. This is particularly important where the child's existing EOTAS package includes small, specialist or highly bespoke provision.

A child making good progress under EOTAS should not be considered to have reduced needs simply because the provision is working. Equally, any decision to alter or cease EOTAS must be based on current evidence, the child's needs and outcomes, and not simply on age, transition point or the availability of a placement.

There must also be a clear and independent route to challenge decisions about the SPP, placement and whether EOTAS should continue. As set out in Q7, early review and mediation are important but should not replace access to independent legal redress where disagreement remains.

Q13. If a needs assessment takes place, what should be the next step for those who are not eligible for an EHCP?

Multiple Choice: A flexible, case-by-case approach.

There should be no automatic transition from EOTAS to school simply because a reassessment concludes that a child or young person does not meet future EHCP or SPP criteria.

The key questions must remain:

- what education can this child or young person actually access;
- what provision will meet their needs; and
- what arrangement is most likely to support sustainable progress and wellbeing?

A decision that a child or young person no longer meets a particular statutory threshold must not be treated as evidence that they are able to return to, or successfully access, a formal setting. These are separate questions.

Where a child or young person has previously been unable to attend an education setting, there must be a clear understanding of why they are now considered not to meet the threshold for an EHCP, particularly where barriers to accessing education remain significant or ongoing. The reasons for that decision should be transparent, evidence-based and clearly explained to the child or young person and their parent carers, with consideration given to whether further assessment or updated professional advice is required.

Suitable and properly resourced alternative provision must be identified and in place before existing EOTAS support is reduced or withdrawn. There must never be a cliff edge where one statutory arrangement ends before another appropriate arrangement is operational.

Any transition should be individualised, gradual and clearly planned. Consideration should be given to whether elements of the existing EOTAS package should remain in place for a period of transition, allowing trusted provision, relationships and support to continue while the child or young person establishes within a new setting.

Particular care is needed where EOTAS has been used because no suitable local placement was available. If the child or young person's underlying needs have not changed, lack of eligibility for an EHCP or SPP must not be used to obscure an ongoing local sufficiency or commissioning problem. New provision, including inclusion bases or other enhanced mainstream offers, may provide an appropriate route for some children and young people, but only where it is genuinely suitable and can meet their needs in practice.

Where a child or young person returns to more traditional education, the arrangement should be actively monitored to ensure it is genuinely successful and sustainable. Review should consider not only attendance, but also learning, emotional wellbeing, regulation, relationships, participation and wider outcomes.

Children, young people and parent carers must be fully involved in decision-making and have access to clear reasons, current evidence and an independent route to challenge both the assessment and any proposed change in provision.

If concerns re-emerge, progress deteriorates or the placement proves unsustainable, this should trigger further review and, where appropriate, reassessment. A previous decision that the child or young person did not meet the threshold should not prevent further assessment where new evidence, changing circumstances or the impact of the placement indicates that this may now be necessary.

Q14. Which factors best support stable transitions and progression for children receiving EOTAS, including return to education where appropriate?

Stable transitions depend on relationships, readiness, continuity, trust and a clear understanding of what success should look like for the individual child or young person.

Children and young people should be actively involved in transition planning alongside their parent carers, current providers and the professionals who know them well. Transition should progress at the child or young person's pace rather than according to administrative dates, standard timetables or assumptions that returning to a formal setting is always the desired outcome.

Transition plans should be individualised, gradual and regularly reviewed. They should allow movement forwards and backwards, including the ability to pause or reduce attendance without automatically losing existing provision or funding.

Continuity of trusted relationships is particularly important. Where possible, existing providers or a trusted adult should bridge the transition, helping the receiving setting understand the child or young person's needs, communication, triggers, strengths and what has enabled successful engagement within EOTAS. Consideration should be given to retaining elements of the existing EOTAS package during transition so that trusted support and relationships remain in place until the new arrangement is demonstrably stable.

The receiving setting must be able to demonstrate that it can meet needs in practice, including through appropriate reasonable adjustments, staff training, flexibility and access to suitable support. The existence of a placement alone should not be treated as evidence that transition will be appropriate or successful.

Progression should also be understood broadly. For some children and young people, success may include increased engagement, improved wellbeing, greater independence, qualifications, community participation or preparation for adulthood rather than a return to conventional full-time attendance.

Review and success must be considered more than attendance. A child or young person may be physically attending while experiencing deterioration in emotional wellbeing, regulation, relationships, engagement with learning or functioning outside education. These wider indicators are essential in judging whether a transition is genuinely successful and sustainable.

If a transition is not working, this should trigger reassessment of EHCP edibility, adjustment and, where necessary, consideration of a return to EOTAS or another arrangement. It should not be viewed as failure by the child, young person or family.

The central measure should be whether the arrangement is meeting the child or young person's needs and improving their outcomes over time, not simply whether they have moved back into a school or college building.

Q15. How effective is the current system in enabling schools to put in place early support for children whose health needs affect their participation in education, before requiring the local authority to arrange alternative provision?

Multiple Choice: Highly ineffective

Families describe children and young people remaining without suitable education for months and being told that they do not meet section 19 criteria despite prolonged inability to attend.

Safeguarding and wellbeing checks, where they do take place, can also be experienced as blaming the parent carer or child or young person, or as procedural exercise, rather than as a genuine attempt to understand what is preventing attendance and what support is needed to enable meaningful re-engagement.

The default response should not be an online tutoring offer. For many children and young people, non-attendance is linked to unmet need, inappropriate environments, sensory factors or a lack of appropriate support. Online provision may therefore be unsuitable. Equally, asking a child or young person who cannot tolerate a busy or overwhelming environment to attend tutoring in an unsuitable community venue is unlikely to address the underlying barriers.

Where alternative provision has been put in place, but the child or young person is unable to engage with it, this should not simply be recorded as non-attendance or non-engagement. The local authority should take active steps to understand why the provision is not working and whether it is genuinely suitable and accessible for that individual child or young person.

In many cases, a lack of engagement may reflect that the provision itself is inappropriate, for example because of the environment, delivery model, location, relationships, sensory demands or the way support is structured. Where this is the case, the response should be to review and adapt the provision, or identify a more suitable alternative, rather than continuing with an arrangement that the child or young person is unable to access.

There should be clear accountability for ensuring that alternative provision remains suitable in practice, not only on paper, and that children and young people are not left for prolonged periods with provision that is technically available but functionally inaccessible to them.

Greater consideration must also be given to therapeutic and well-being-focused provision. This should not be interpreted narrowly or limited to solely outdoor activities. Support must be matched to the individual child or young person's needs, circumstances and intended outcomes.

Access to timely mental health support is also a significant part of this picture. Families report long waits for support, variation in the availability, thresholds and eligibility criteria for services, and situations where children and young people are declined mental health support because their presentation is attributed to autism or another neurodevelopmental condition rather than recognised as requiring a mental health response.

These difficulties can be compounded by unmet needs within education. This can create a cycle in which the child or young person's distress increases, their ability to access education reduces further, and the underlying unmet needs within the education setting remain unaddressed.

Where a child or young person is unable to attend school and is also seeking mental health support, prolonged waits or refusal of support can significantly extend the period in which they are unable to access education. During this time, needs may escalate, relationships with education can deteriorate and difficulties can become more entrenched. Parent carers report that, in some cases, the absence of timely support

contributes to needs escalating to the point where an EHCP is later required, when earlier intervention may have prevented or reduced that escalation.

Education and health systems therefore need to respond together. A child or young person should not be left without appropriate educational or mental health support because their needs sit across service boundaries, or because one service considers another service to be responsible. Access to education should not depend on reaching a particular mental health threshold, and neurodevelopmental needs should not in themselves become a reason to exclude a child or young person from appropriate mental health support.

Clear joint pathways, earlier intervention and equitable access to support are essential. Early support requires better staff understanding prompt reasonable adjustments, flexible education, earlier multi-agency involvement and a clear escalation pathway when school-based support is insufficient.

Importantly, attempts by schools to put support in place must not delay local authority involvement where it is already clear that the child or young person would otherwise be left without suitable education.

Q16. How could roles and responsibilities between schools, local authorities and health services be clarified to support more timely and effective support for children who are unable to attend school due to health reasons and require alternative provision?

There should be a nationally defined pathway which makes clear who is responsible, what action is required and within what timeframe when a child or young person is unable to attend school because of health needs.

Schools should identify emerging barriers early, make reasonable adjustments, maintain meaningful educational contact and involve the local authority promptly where a child or young person is likely to require alternative provision. Where attendance difficulties persist, schools should work with the child or young person and their parent carers to understand the reasons, rather than treating non-attendance primarily as a compliance issue.

Local authorities must remain clearly accountable for their section 19 duty. Responsibility should not depend on a school making the “right” referral or obtaining a particular form of medical evidence where it is otherwise clear that the child or young person is not receiving suitable education.

Where alternative provision has been arranged but the child or young person is unable to engage with it, this should trigger active review. Local authorities should take steps to understand why the provision is not working and whether it is genuinely suitable and accessible for that individual child or young person. Lack of engagement may indicate that the provision itself is inappropriate because of the environment, delivery model, location, sensory demands, relationships or the way support has been structured. In these

circumstances, the response should be to adapt the provision or identify a more suitable alternative, rather than allowing an inaccessible arrangement to continue.

Health services should provide relevant evidence and advice about the child or young person's health needs, functional impact and required adjustments, but should not become gatekeepers determining entitlement to education. A child or young person should not be left without educational support while waiting for mental health assessment, treatment or specialist advice, particularly when delays are prolonged or support is declined because needs are attributed to autism or another neurodevelopmental condition.

Parent carers and the child or young person themselves may also be under significant pressure during prolonged periods of non-attendance, particularly where education, health and care needs are escalating. Consideration should therefore be given to what support the wider family may need, rather than focusing solely on securing an education placement. This should include whether social care needs assessment, carers assessment or other appropriate family support may be required, particularly where caring responsibilities, distress or the impact on family functioning have significantly increased.

Prolonged periods where a child or young person is unable to access education can also have a significant impact on parent carers' ability to work, resulting in reduced hours, loss of employment or additional childcare and care costs. This can create considerable financial strain for families at the same time as they are managing increasing levels of need.

A coordinated response should therefore consider the wider impact on the family and ensure that parent carers are not left to absorb the practical, emotional and financial consequences of gaps in education, health or care provision.

Q17. Where alternative provision is required to meet health needs, how can children be better supported to transition back into school?

Return to school should be based on the child or young person's health, readiness, individual circumstances and the suitability of the receiving setting, rather than on the expiry of an alternative provision placement or an expectation that return should happen within a fixed timeframe.

There should be a co-produced transition plan involving the child or young person, their parent carers, the school, alternative provision provider and relevant health professionals. The plan should set out what support is required, how progress will be reviewed, what signs may indicate that the transition is becoming difficult, and what action will be taken if concerns arise.

The receiving school must recognise that returning to school does not necessarily mean that the underlying health need has resolved. The child or young person may continue to require significant adjustments, flexibility and support in order to access education successfully.

A phased timetable, reasonable adjustments, flexible expectations and a named trusted contact in school should be available without families having to repeatedly negotiate or re-evidence the same needs. Staff should understand the child or young person's needs, what has supported successful engagement within alternative provision, and any factors that may increase distress or reduce access.

Where appropriate, alternative provision should overlap with the transition back into school so that trusted relationships and support are not withdrawn before the new arrangement is demonstrably stable. There should also be a clear contingency plan which allows support to be increased again if attendance or engagement becomes difficult.

Where a transition begins to break down, this should trigger timely review, curiosity about why the arrangement is not working, and additional support. It should not result in sanctions, blame, or an assumption that the child or young person simply needs to “try harder”. Consideration should be given to whether the setting, environment, adjustments or level of support remain appropriate.

If a child or young person is unable to engage with the school placement despite appropriate support, this should prompt further assessment of need and consideration of whether a different form of provision is required. The aim should be to prevent another placement breakdown or a prolonged period without suitable education.

Continuity of curriculum is also important, particularly for older children and young people approaching qualifications. Transition planning should ensure that unnecessary disruption to subjects, learning pathways and examination preparation is avoided wherever possible.

The impact on the wider family should also be considered. Parent carers may have been providing significant levels of care during prolonged non-attendance, with consequences for employment, finances and family wellbeing. Transition planning should therefore consider whether additional family support or assessment may be required.

Success should be measured by sustained engagement, learning, emotional wellbeing, regulation, relationships and wider outcomes, rather than by how quickly a child or young person returns to full-time attendance. A successful transition is one that is safe, sustainable and meets the child or young person's needs over time.

Q18. What approach, if any, should be taken to the duration of placements for children receiving alternative provision through Online Education Accredited Providers?

Multiple Choice: The duration should depend on individual circumstances.

NNPCF does not support an arbitrary national time limit for online provision.

The proposed 12-week model does not reflect the significant diversity of children and young people who may need to access online education. For some, online provision may be a short-term intervention that supports reintegration into a school or college setting. For others, particularly those with significant health needs, periods of medical recovery, anxiety or difficulties leaving home, online provision may be the only form of education they can currently access successfully. This may be especially relevant where appropriate health or wider support has not been available or has been significantly delayed.

Placements should therefore be reviewed regularly against the child or young person's individual needs, engagement, progress and outcomes, rather than ending automatically after a predetermined period.

Similarly, limiting longer-term online education to two days per week could leave some children and young people without access to suitable education for the remaining days where they are unable to attend a physical setting. This is particularly important for older pupils working towards GCSEs or other qualifications, where continuity of learning and access to the full curriculum can have a significant impact on outcomes.

Online provision should not automatically be regarded as inferior or temporary. Equally, children and young people should not be placed online simply because appropriate face-to-face provision is unavailable.

Reviews should consider whether the provision remains suitable, whether it continues to support progress and wellbeing, and whether additional, blended or alternative opportunities would improve outcomes. Any change should be based on individual need and readiness, not an arbitrary time limit or assumption that online education must always be reduced over time.

Q19. Should children receiving alternative provision through Online Education Accredited Providers remain on the admission register of a school?

Multiple Choice: It should depend on individual circumstances.

Remaining on the admission register of a school can provide important continuity, accountability and safeguarding oversight, particularly where online provision is intended to be temporary and there is a realistic plan for the child or young person to return to that setting.

However, remaining on roll must mean more than simply retaining the child or young person's name on a register. The school should have clear and defined responsibilities for maintaining appropriate contact, monitoring progress, safeguarding, curriculum continuity and contributing to review and future transition planning.

There will also be circumstances where the relationship with the existing school has irretrievably broken down, the placement is no longer appropriate, or the child or young person has experienced significant distress or trauma associated with that setting. In these cases, requiring them to remain on that school's roll may provide little meaningful protection and may in some circumstances increase distress. Safeguarding or welfare checks carried out by a school with which the child or family no longer has a trusted relationship may also be experienced as intrusive or upsetting rather than supportive, and alternative arrangements should be explored.

Where remaining on the existing school roll is not appropriate, alternative arrangements must provide equally clear accountability for education, safeguarding, progress, review and future planning. The key issue should not be administrative registration in itself, but whether there is a genuinely suitable and accountable arrangement around the child or young person.

NNPCF therefore considers that the overriding consideration should be whether remaining on roll supports the child or young person's needs, wellbeing, continuity of education and future outcomes.

Whatever model is adopted, no child or young person receiving online education should become invisible to the system. There must always be a clearly identified body or professional with responsibility for education, safeguarding, progress, review and ensuring that any concerns are acted upon promptly.