



Bristol City Council

A review of:

**Approach to Delivering SEND; SEND Home to School Transport; Driving Excellence in
Schools and Trade Services with Schools**

January 2019

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1. EXECUTIVE SUMMARY

1.1 SEND

Local authorities nationally are experiencing a rise in the demand for services for children and young people with SEND and spend of High Needs funding is often exceeding its budget. Anecdotal evidence from many of these suggests that not only are these needs becoming more numerous by volume, but also in their complexity. This, in turn is putting pressure on local authorities and providers to meet and resource these needs. Many Councils are therefore reviewing their current provision to respond to changes in demand and to make it fit for purpose in terms of addressing current and future SEND needs effectively. Bristol City Council are among the first Councils to undertake a deep dive analysis to review its SEND systems and processes, including assessment, financial processes and commissioning, to ensure they have challenge and are delivered in a timely way.

The first observation of this review was the lack of a SEN Strategy that sets out the Bristol context, its current and future SEN profile, and its vision for addressing SEN needs in the City. This in itself would help give direction to addressing the issues that Bristol have in relation to the increase in demand for SEN services and the potential future impact on the budget. This review has now seen plans by the local authority to develop a SEND Improvement Plan. The scope of this review does not lend itself to a forensic analysis of this, however it seems clear that many of the recommendations made in this review are consistent with the plans priorities albeit a greater focus on utilising resources to ensure value for money outlined in this review. Appendix 1 – the Implementation Plan of this review, identifies where there may be any additions or differentiation.

In terms of educational outcomes for children and young people with SEND, Bristol averages lower achievement at foundation stage but catches up with regional, national and statistical neighbour averages at Key Stage 4. However, it then falls slightly behind regional and national averages for post 16 indicators including those in education at 17 and achievement of Level 2 and Level 3 qualifications, whilst remaining in line with statistical neighbour averages.

The business process for the assessment of EHCP applications is clear in respect of the flowchart from application to the development of a plan. However, a clear message from this review has been that the volume of requests for assessments and then the high ratio of assessments becoming plans is putting an unsustainable pressure on the team dedicated to processing these. Up to 2017, Bristol was in line with other local authorities in respect of volume. However, local 2018 figures show a steep rise, that, national rise notwithstanding, is likely to take Bristol beyond these.

This is partly being driven by a particular increase in both assessments and plans due to a revised way of interpreting the “legal tests” as set out in the SEN Code of Practice which appears to be rather risk averse, alongside a legacy backlog of reviewing existing cases that occurred as a result of a not being at a full staffing capacity in 2017/18 due to a recruitment freeze. The rise in the volume of both assessments and plans is therefore impacting upon the statutory timescales relating to these, which means that from a position of comparing well with other authorities, Bristol is now likely to start to fall behind. A further consequence is the Educational Psychology Team is for the first time struggling to meet its statutory assessment timescales and that this is then further impacting upon their capacity to operate in an advisory and preventative role with schools that would prevent the need for some assessments / plans in the first place. There is then an impact on the capacity to review plans, in so doing reviewing their currency and value for money as well as their quality now that conversions from statements to EHC Plans is almost complete. This is especially important as Ofsted are now beginning to look at their quality, in particular whether they have moved from single agency to multi agency plans

A further observation of the assessment pathway is that the Graduated Pathway that schools should follow before they request an assessment for pupil has not been clear. This makes requests for assessment both more likely and less open to challenge. It also plays into a narrative for parents with children with SEND that mainstream schools cannot manage SEND needs confidently and therefore reduces parental confidence in a mainstream education. The significantly higher rate of fixed term exclusions for SEND pupils in Bristol will be supporting this narrative. We are aware that the re-launch of the Graduated Pathway is underway and the effective implementation of this is critical.

Whilst appreciating that Bristol is currently operating within a context of a recent Judicial Review that is likely to have encouraged a cautious approach to assessment, there are opportunities to reduce the numbers of assessments and plans through a more robust approach “upstream”. This would include:

- Implementing and reviewing the progress of the new Graduated Pathway collaboratively with schools, parents, carers and children / young people including identifying best practice approaches that would make schools more inclusive and prevent in some cases the need for formal assessment. By making a clearer Graduated Pathway, the local authority would be in a stronger position to challenge schools on the part of the SEN Code of Practice “legal test” that requires schools to evidence that they have done all they can but progress is still not being made.
- Alongside this, consider how further investment or a realignment of resources could be made to enable the Educational Psychology Team to take more of a formal lead on a SEN Advisory and Improvement function with schools. This would increase the skills base of schools in respect of SEND, supporting the drive to make them more inclusive, increasing parental / pupil confidence in the mainstream, and reducing the need in some cases for more formal assessment.

In turn, this will start to reduce the pressure on special school resources by educating more pupils with lower level needs in mainstream schools, leaving special schools to focus more on those with more complex needs. This will then leave placing a pupil in the independent sector as an exception. Given the rise in the complexity of cases in recent years, most local authorities are now finding that their special school provision requires this remodeling. Bristol is no exception, and this review recommends this alongside a review of its Early Intervention and Resource Base provision, complementing the approach to improving the graduated approach that supports more pupils in mainstream and raises the confidence of parents and carers of their ability to do so. Ultimately, once all relevant information is available, it will be possible to model the savings that the authority will achieve through this which will reduce the pressure on the High Needs Budget.

There also appears to be opportunities to better use resources that are currently being used to deliver the Bristol Autism Education Hub and support to pupils with sensory impairment via the Sensory Support Team. The assessment function of the Autism Hub would appear to be a duplication in function of other teams that undertake assessment, whilst there is an opportunity to review the value for money and targeting of the resources supporting the Sensory Support Team. Savings from these actions could be realised or some of them could be redeployed in the short term to support the capacity issues in the SEN Assessment and Ed Psych Teams, until the improved graduated approach is implemented to reduce the number of assessments.

Finally, there is now a SEN Business Unit which has taken on responsibility for the commissioning and contract management of SEN placements, which currently sits separately from wider Children's Services commissioning processes. As this team is new and there are some legacy issues that need addressing as a matter of urgency, this review does not suggest any remodeling of this approach at this stage. However, as part of its recommendations and implementation timeline, it is proposed that this is revisited once areas of greater priority have progressed.

1.2 SEND Home to School Transport

Home to School Transport policies are deliberately light in detail so as to be flexible. However, whilst this is understandable, HTST's, there would be merit in reviewing both policies and processes to ensure that they are as detailed, robust and transparent as possible so as to be able to respond to any challenges to decisions. We would also propose that mapping out the processes used to determine and sign-off travel support requirements, and then subjecting a sample of completed processes to occasional internal audit, would provide both assurance to senior management that these processes are as robust as possible and consistently applied, and provide further support for officers to meet any future challenges to decision-making about travel support that may arise.

The HTST team takes its responsibility to provide appropriate, high quality, value for money travel support very seriously. The trends in demand support the contention that the team has had significant success in generally containing or reducing costs and the numbers of students provided with travel support in recent years, particularly taking into account inflationary pressures on the cost of transport and staff wages, the rising numbers of children identified as having SEND, the pressures to extend education provision from 0-19/25 and the variation in the number of school days from year to year.

However, the cost of travel support per child/young person is rising. The reasons for this are complex but, apart from the inflationary impact on costs, it is likely that the more successful HTST are in reducing the numbers receiving support, those that remain will be those whose needs are more complex and whose travel support costs will be the highest (figures a rising trend of more students receiving lower cost travel support alternatives to the provision of transport, such as Personal Travel Budgets (PTBs) and assistance with using public transport). We would therefore recommend the re-basing of the in-year and projected future years' travel support budgets (probably on a rolling 3-year basis) to accurately reflect current costs, the known and anticipated variations in costs that arise year-on-year and, crucially, the delivery of efficiencies that may be anticipated by HTST and, in turn, agreed with PTS as the major 'provider' to HTST. Having said this, there are likely to be opportunities to reduce costs - the average annual cost per service user is £4.7k but this rises to £6.3k when the costs of escorts and the PT management fee are added in; this is higher than we would expect for a city environment, and our review has highlighted some opportunities for reducing these costs without impacting on the service user. This includes changing the method of provision of escorts and route optimisation.

Furthermore, whilst alternative travel arrangements are considered, less emphasis is placed on Independent Travel Training. Whilst short term return on investment on this can be variable, there can be longer term benefits to adults' services as well as providing significant social benefits to the individual in terms of independence and access to the wider community.

In common with many other Local Authorities, BCC now call-off all passenger transport services from the local commercial private hire/contract hire market as required, through a price-per-mile Framework Agreement (FA) that covers a range of vehicle types from cars to large wheelchair-accessible vehicles. Our cursory review of the documentation used to procure and operate the existing framework agreement suggests that there are opportunities to make a number of amendments in a new framework that would benefit the local authority in terms of maintaining competition through the life of the agreement and giving greater control over the quality and cost of the services provided. There may even be a business case for the local authority to purchase and run its own fleet of larger, accessible vehicles.

Our recommendations for SEN Home to School Transport therefore fall into 3 main categories:

- Rebasing the Home to School Transport budget to accurately reflect current costs; the known and anticipated variations in costs that arise year-on-year; and the delivery of efficiencies could be achieved, such as a review of how escorts are used, route optimisation, procuring a new Framework Agreement, and continually reviewing whether there is benefit to the local authority purchasing its own larger vehicles for passenger transport.
- Reviewing SEND travel support policies and processes should be reviewed to ensure that they are as detailed, robust and transparent as possible.
- Considering further developing Independent Travel Training for its wider social benefits as well as longer term financial benefits to the Council.

1.3 Trading Services with Schools

Generally, in a traded relationship there is a clear client /provider split. The client, in this case, in relation to the delivery of statutory education services and additional services it wishes to fund, is the Local Authority. It has responsibility to specify the service it requires to be delivered in terms of outcomes, quality and timeframe. The provider should then respond with proposals and a price. Ultimately a contract or a Service Level Agreement (SLA) is put in place that the client monitors performance against a set of agreed performance indicators, linked to the outcomes.

However, in the relationship with Trading with Schools the client/provider split in Bristol is not clearly delineated, with the provider preparing Service Level Agreements, many of which are not signed off in this financial year. The client is specifying inputs rather than outcomes, for example in the case of Education Welfare Officers and Bristol Improvement Partners the inputs are a visit to each school in Bristol annually and it is not clear that this is having any impact on improving outcomes in schools. The client is not monitoring effectively partly due to lack of resources and partly because they do not have the necessary skills to do so. Trading with Schools (TwS) has preferred provider status and therefore it is difficult to determine value for money. The LA should be clear about the level of service to be provided on a scale from a full universal service to a service with resources focused on Maintained Schools not achieving 'Floor Standards'. The latter is likely to have greater impact on overall performance. It should also consider whether it is cost effective to outsource services that do not have the potential to generate further trading opportunities and therefore surpluses that are beneficial to the local authority.

In order to deliver the client role effectively, the local authority should have in place a team to lead both the strategy for the Authority, deliver thought leadership and the intelligent client function as the purchaser of services and regulatory responsibilities effectively. Their role would be to determine outcomes and to input the professional knowledge to the specification and monitor delivery. The client side needs to be strengthened to deliver both aspects of this role. It will be important that part of the functions includes ensuring that TwS is held to account. This should be more manageable because TwS is now sitting in another Directorate creating a more effective client/provider split. A significant proportion of the local authority spend is allocated to the Education Psychology Service and it is proposed that the Principal Education Psychologist is moved to the client-side to lead on all inclusion activities,

including leading strategy on making schools more inclusive, thus alleviating pressure on the management of SEND Services and bringing much needed professional expertise into the senior leadership team.

TwS generate surpluses that are clawed back by the local authority because the local authority is managing the risks associated with maintaining the business unit. Surpluses have been in the region of £800k per annum until this financial year when it looks like they have reduced by half. Approximately 70% of TwS business is from schools and other organisations while 30% is from the local authority. TwS has good relations with its school clients and the leadership from the Commercialisation Directorate have an opportunity to grow their business. It would be appropriate to agree that the surpluses generated should be utilised by the local authority education client-side to augment other income to lead, commission and deliver school improvement and inclusion activities.

A new approach to commissioning will enable TwS to become more innovative in its response to specifications and ultimately in the way that it costs and delivers services. Currently it utilises a standard day rate to cover all costs, including staffing, premises and a contribution of £769,000 to Council costs. This approach hampers innovation and makes them less competitive. The corporate overhead, for example, makes them expensive compared to competitors in the market place. If the local authority wishes TwS to become more competitive and generate further business from new clients and to generate more surpluses, then the contribution to Council overheads should be reviewed corporately so that it becomes a pro-rated charge set using an indicator – for example staffing levels or a percentage of turnover.

1.4 Driving Excellence in Schools

The local authority employs a core-team to lead school improvement and makes available resources from its General Fund and through Trading with Schools to deliver school improvement activities that are commissioned from Trading with Schools, Independent Education Partners, Teaching Schools and voluntary organisations. School performance in the secondary phase has declined in terms of pupils making progress over the last few years and in both primary and secondary schools in terms of Ofsted outcomes. Currently the resources available are being used for both universal and targeted activities with the universal aspect being available to all schools including those academies that request them. This approach is not realizing improvement and does not fit the requirements of the DfE in terms of school improvement activity and in some case duplicates the roles of others in the school improvement community.

It is proposed that the local authority takes a more strategic approach to school improvement, putting in place a strategic plan that is developed with all stakeholders and becoming an enabling and facilitating organisation, collecting and analyzing information and being a key influencer of others in the

community. Its resources should be focused on poor performing schools ('coasting' schools and those not achieving or at risk of not achieving 'floor' standards) and inclusivity and together this should complement that of others. The LA can facilitate school led systems so that they operate effectively to have greatest impact (e.g. collaboration between schools judged 'outstanding' and those with a 'Requires Improvement' category) and this approach will ensure ownership and a shared direction.

2. RECOMMENDATIONS

2.1 SEND Recommendations

Recommendation 1 – Develop a SEND Strategy that outlines Bristol City Council's vision for and approach to supporting children and young people with SEND in education.

This should include:

- A detailed understanding of Bristol's future needs and profiles of required specialist provision to meet that need.
- An understanding of the perceived barriers to inclusion in mainstream schools and colleges and how these will be collaboratively addressed with children, young people and schools.
- A plan to achieve better outcomes for children and young people with SEND as part of a better value for money approach to provision.
- The approach to the assessment of need and the roles and responsibilities of different stakeholders in this
- The approach to and process for reviewing the progress of SEN Support and EHCP plans, including a cohesive approach to local authority representation at these meetings.
- The approach to engaging with children, young people and their parents to help review and shape provision
- The approach to ensuring the sufficiency and/or suitability of provision for young people with special educational needs from 16-25.
- Where responsibility for all elements of strategic leadership of SEND sits within the Authority and how to whom this is accountable.

Recommendation 2 – In collaboration with schools, children and young people and their parents, develop a clear approach to the Graduated Approach for schools to evidence before seeking an EHC Assessment

- Bristol City Council should then apply a threshold that requires schools to have clearly evidenced that they have taken a Graduated Approach but that, evidentially, the child / young person is not making progress, before an EHC Assessment can be agreed to. This would help Bristol City Council more rigorously apply section 9.14 of the SEN Code of Practice and reduce the number of cases that may not require an assessment or plan if a Graduated Approach had been applied and hence reduce some of the capacity pressure on those that administer the assessment process.
- Alongside this, there is an opportunity to review the Bristol Universal Descriptors so that they are more user friendly and can be used to inform a dialogue with schools and parents / carers as to levels of need and how best these needs can be met.

Recommendation 3 – Disband the Bristol Autism Education Hub in order to realise savings.

- The Bristol Autism Education Hub should be disbanded, making a financial savings and streamlining assessment for children with Autism.
- It may be appropriate to move some advisory teacher capacity into the Bristol Autism Team - Family Learning and Family Support Hub so that the advice to schools can continue, either as a funded service or a charged service to schools

Recommendation 4 – Reduce the costs of Bristol's contribution to the regional Sensory Support Service by reducing the focus to statutory functions by:

- Reviewing what the service is delivering in the assessment process to reduce duplication.
- Being clear about roles and responsibilities in relation to Health and equipment.
- Renegotiating service levels by developing a differentiated service to better meet local needs.
- Putting in place a tiered support model for beneficiaries differentiating service levels according to need with the lowest tier receiving the least interventions and maximising resources for those with the greatest need – on the highest tier.
- Increase the amount of services that are traded.

Recommendation 5 - Use the review process to review the quality of EHCPs as well as their currency

- Building upon the Safeguarding in Education Team audit and now that the majority of conversions from statements to EHCPs has been completed, there is now an opportunity to revisit the quality of plans and the extent to which they are multi agency.
- There is an opportunity to review different how different plans held by different services may be combined into one and reviewed as such, as well as increase communication between services when an episode in one may impact upon progress in another, to ensure an integrated approach to meeting the child or young person's needs.

Recommendation 6 – Clarify and develop the SEN School Improvement Function to support the implementation of the Graduated Approach

- There is a need to ensure that non-statutory, preventative Educational Psychology work is part of commissioned/funded LA EP work, or is commissioned adequately by maintained schools and academies, as it can play an important role in reducing the need for statutory assessments. The needs to be some focus on non-statutory work, in order to build parent/carers and organisational confidence, meet children's needs and reduce the need to request statutory assessments.
- This supports the view of the Association of Educational Psychologists which states “ We particularly welcome recognition by the government that the role of educational psychologists is wider than the assessment of the most vulnerable children, and also includes providing advice and support for schools, families and communities in how to support the learning and wellbeing of all children and young people.”
- In order to do this, the Educational Psychology needs to be commissioned at an appropriate level to undertake this function in addition to its assessment role.
- To support this, there is an opportunity to further develop the role of Special Schools and Resource Bases in providing advisory and other support to mainstream schools, to help these manage SEND needs in a mainstream environment.

Recommendation 7 – Re-model the offer made by maintained Special Schools, Resource Bases and Early Intervention Bases in the local authority.

- There needs to be a real focus on special schools working with pupils with more complex needs, whilst those with lower level SEND should be educated in mainstream schools, underpinned by increasing places in Early Intervention Bases (EIB) and Resource Bases (RB) in maintained schools and academies. This will reduce the likelihood of special schools becoming filled pupils who could be educated in mainstream and hence reduce dependency on independent provision, utilising it only in exceptional cases for pupils with the most complex needs that cannot be met locally.

- To enable this recommendation to be achieved, a workstream will need to be developed to undertake an in depth programme with schools to remodel the special schools, Early Intervention Bases (EIB) and Resource Bases (RB) offer.
- This work will also complement and be complemented by that on the Graduated Approach to make schools more inclusive and give parents the reassurance that the mainstream offer is a good one. This work will also complement that on the Graduated Approach to make schools more inclusive.

Recommendation 8 – In the longer term, consider the arrangements for the commissioning of SEN placements to ensure that any duplication is removed

- A review of the commissioning functions of the SEN Business Unit in respect of the commissioning and contracting of SEN placements and how this relates to the wider commissioning function within Children's Services should take place once more pressing priorities have progressed. This may provide opportunities for efficiency through a removal of duplication.

2.2 Home to School Transport Recommendations

Recommendation 1 - The in-year and future year's budget for HTST should be re-based to accurately reflect current costs; the known and anticipated variations in costs that arise year-on-year; and the delivery of efficiencies that may be anticipated by HTST and, in turn, agreed with PTS as the major 'provider' to HTST.

Recommendation 2 - The SEND placement panel and travel panel should be combined to ensure that placement decisions are fully-informed about associated travel support requirements and costs.

Recommendation 3 - SEND travel support policies and processes should be reviewed to ensure that they are as detailed, robust and transparent as possible.

Recommendation 4 - Completed SEND travel support decisions, and the processes by which they are reached, should be subject to occasional sample audit to ensure that travel support policies and processes are correctly and consistently applied.

Recommendation 5 - The potential costs and benefits of a more extensive programme of Independent Travel Training than is currently in place should be reviewed, taking into account the availability of current training services in the market and whether a viable business case can be developed.

Recommendation 6 - BCC should procure a new passenger transport Framework Agreement, unless an in-depth comparative analysis of an alternative approach, such as the use of a Dynamic Purchasing Systems, shows that this would be more favourable.

Recommendation 7 - Consideration should be given to changing the current practice of provision of passenger service escorts by the Council to provision by transport contractors, and that any proposed change should be taken into account in the Procurement Strategy for replacement of the transport Framework Agreement in 2019.

Recommendation 8 - Monthly charges to HTST should be reconfigured to reflect the full cost of each route, including the cost charged by the contractor, the cost of any passenger service escort provided, and an appropriate apportionment of the PT management fee.

Recommendation 9 - PT considers the key requirements for replacement of the existing Logical Transport transport management system to determine whether a COTS or bespoke solution would be most appropriate.

Recommendation 10 - The principles of the Total Transport initiative should be reviewed, in conjunction with local Community Transport, NHS and other partners, to see if they offer any potential application and benefit in Bristol.

Recommendation 11 - The potential re-constitution of a BCC in-house fleet should be kept under review to see whether a business case, built on current or future costs of a new service, can be made in comparison with the evolving availability and costs of local commercial services.

Recommendation 12 - The existing SLA between HTST and PT should be reviewed and updated to reflect a re-invigorated 'customer-supplier' relationship between HTST and PT.

Recommendation 13 - There is a need to ensure that HTST is much more actively involved in procurement decisions being taken by PT in the next few months to replace both the current passenger transport Framework Agreement and the current transport management system.

2.3 Trading Services Recommendations

Recommendation 1 - Put in place appropriate resources so that the Education function, within the local authority, can lead strategy, deliver thought leadership deliver the intelligent client function and regulatory responsibilities effectively.

The recent move of Trading with Schools to a different Directorate creates an opportunity to develop the education client side. Actions supporting this recommendation include:

- Put in place a new team on the client-side with three different posts: the first leading school improvement, monitoring and brokering supported by a post with responsibility for data; the second leading inclusion – this should be the Principal Educational Psychologist; the third leading SEND services.
- Ensure resources are available, with functions clearly attributed to specific roles on the education client side and commissioning, so that the LA can deliver a clear client role in terms of preparing specifications and monitoring service delivery.
- Develop a strategic plan that responds to the data and is outcome focused with clear timelines and performance indicators.

Recommendation 2 - Agree that the surpluses generated by TwS should be utilised by the LA education client-side to augment other income to lead and deliver school improvement and inclusion activities.

Recommendation 3 – Review all outsourced activities to ensure outcome focused specifications, appropriate levels of service and cost effectiveness.

There is an opportunity to review all outsourced activities to determine:

- Specifications for services with the outcomes required from each activity with clear performance indicators and timelines so that TwS can respond with costed proposals and ultimately Service Level Agreements can be agreed.
- The level of service to be provided on a scale from a full universal service to a service with resources focused on Maintained Schools not achieving Floor Standards.
- Reduction of the spend on Education Welfare activities by removing resources utilised to enable one visit per annum to all schools.

- The cost effectiveness of outsourcing services that do not have the potential to generate further trading opportunities.
- Review the cost of delivering the Admissions Service in house as opposed to through TwS and see if it is more cost effective.

2.4 Driving Excellence in Schools Recommendations

Recommendation 1 – Reconfigure the approach to driving excellence in schools considering the DfE’s (November 2018) guidance on the role of Local Authorities in school improvement utilising the funding that they make available to the Authority. Focus the central Education function on:

- Gathering and analysing data to identify schools that are not meeting the ‘floor standards’ defined by the DFE, this will include putting in place an SLA with the LAs Data Team to define the data that is required and by when.
- Facilitating input from Teaching Schools and National Leaders of Education in under-performing ‘coasting’ schools, enabling them to access the support they need to improve,
- Stimulating more school to school support, working with Teaching Schools’ by encouraging good and outstanding maintained schools to take responsibility for their own improvement and support other schools.

Recommendation 2 – Put in place a clear strategy and plan that describes the LA’s enabling function in relation to school improvement in maintained schools. The strategy should include targeting resources so that they have the greatest impact on ‘coasting’ schools and those not achieving or at risk of not achieving ‘floor’ standards. Re -specify how the LAs General Fund and other funds being funnelled to Trading with Schools should be utilised in the light of this new strategy. The plan should include:

- Clearly defined targets with measurable outcomes to be achieved in maintained schools, agreed with headteacher groups, with roles and responsibilities defined.
- A clear process to be defined that identifies a timeline for interventions so that the LA can be deemed to have ‘acted swiftly’ by the Regional Schools Commissioner (RS
- Resources should be focussed on those schools with the greatest need after Teaching Schools and NLEs have been deployed.
- The function of School Improvement Partners spending a minimum of 1 day in each school should cease.
- Commissioning additional activities from Teaching Schools and others should cease as these should be funded either by the resources made available to these organisations or from the school’s own budget.

Recommendation 3 - Put in place a manager to lead School Improvement Monitoring and Brokering function, strategy and plan on the client side, within Education Services. This post should be supported by post responsible for data analysis so that services can be directed where they are needed most.

The School Improvement post would have responsibility for:

- Specifying the services (in a Service Level Agreement (SLA) with Trading with Schools) that are required to deliver the LA's statutory function and its strategy and plan;
- Ensuring appropriate and timely collection, collation and analysis of data;
- Utilising the data to determine where resources are deployed by Trading with Schools to improve maintained schools that are not achieving 'floor standards' or are 'coasting' and specifying responses.
- Monitoring the delivery of the SLA and holding Trading with Schools to account for this activity.

Recommendation 4 - Build a strong relationship with the RSC, defining what success looks like and be clear about roles in relation to issuing warning notices to maintained schools.