



A Better

Alternative:

No student in unregistered
alternative provision, **how and why?**

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No student in unregistered AP: how and why?

Introduction

It is over 20 years since we opened our first TLG Education Centre in Bradford, West Yorkshire. From the start, throughout the launch of every TLG programme and centre, we have been driven by the core belief that every student deserves high-quality education.

Our experience of the Alternative Provision (AP) sector leaves us in no doubt that education must be delivered by a registered provider. It is fundamental that providers are able to identify, assess and meet the needs of individual students, adhere to safeguarding requirements and are registered and regulated to ensure standards are being maintained.

We have seen the life-changing impact that a high-quality education can have on students and families first-hand. We also have experienced the benefits that come with a network of registered AP schools, sharing of practice, curriculum intent, professional knowledge and leadership systems. This all results in successful outcomes for young people who may otherwise have fallen through the cracks of our sector.

Currently, however, not every student is being educated in a registered school. This means that thousands of students across England are in the care of providers who are not consistently held to appropriate educational standards. This is deeply worrying. While some of these provisions will be performing well, in some cases it is leaving the most vulnerable students, in the greatest need,

at risk of sub-standard care and education. This is simply unacceptable.

The big issue is that many of these unregistered providers are operating within the law. Registration is not required in certain situations for example if the provision is caring for fewer than five students or operates less than full time. As such, we have taken this opportunity to review the current registration guidelines and, using both our own experience and that of others in the sector, we have considered appropriate reforms to the current registration process that could ensure every alternative education provider is registered.

This paper and our recommendations are underpinned by the desire to develop a registration system that works for AP, raises the esteem and appreciation of skilled educators and ensures that the education and wellbeing of students is the thing that matters most.



Tim Morfin

TLG Founder and Chief Executive

1. www.gov.uk/government/news/new-data-shows-illegal-schools-are-a-huge-nationwide-problem (accessed 17/11/2021)

2. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865049/BRANDED_independent_school_registration_guidance_21_August_2019Ms.pdf (accessed 17/11/2021)

Executive Summary

Vulnerable students across the country are at risk of experiencing sub-standard education and care.

For too long, the legislative threshold for when an educational setting has to register has allowed students to be legally educated in unregistered Alternative Provision (AP). Not only do such unregistered settings exist, but Local Authorities refer students to them due to a lack of quality registered AP across the country.

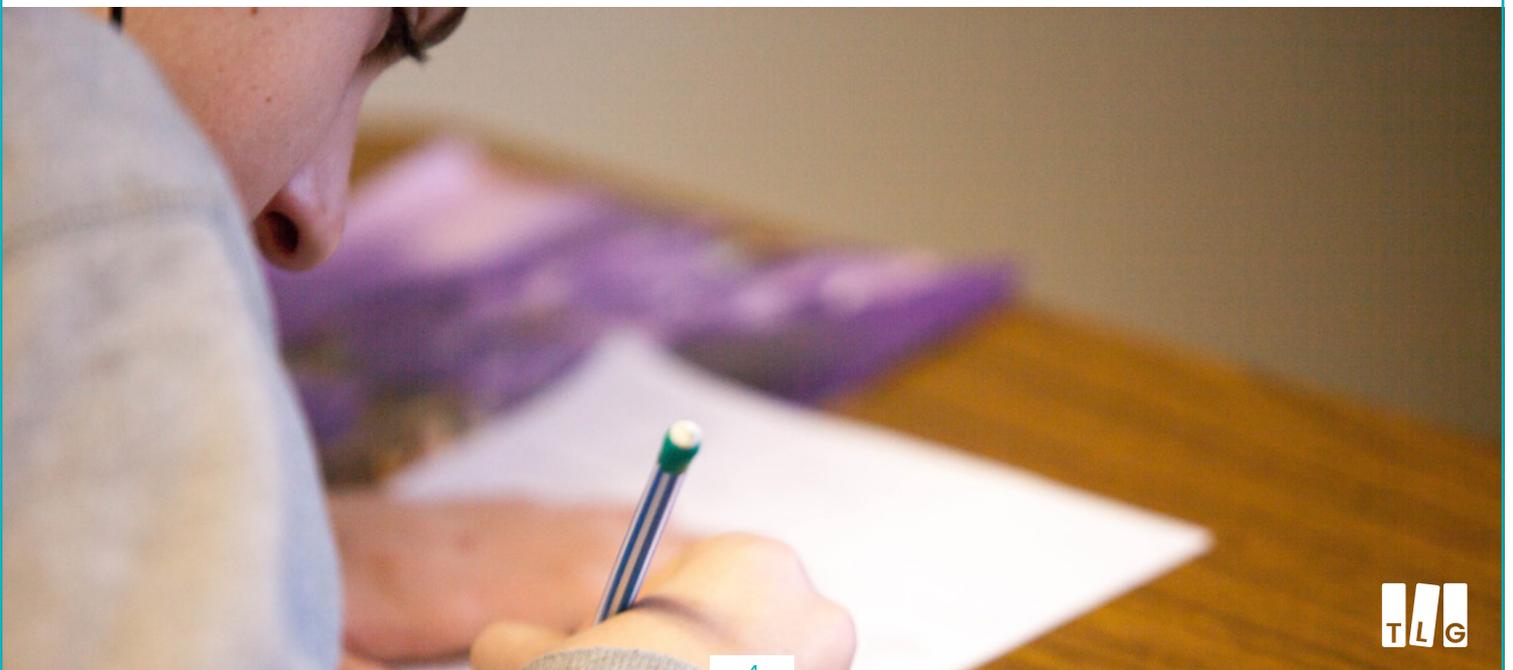
Despite concerns around the lack of accountability and standards these settings are being held to, action has yet to be taken to broaden the threshold to compel all educational settings to register.

Unregistered schools, that do not meet the current threshold for registration, are not legally required to be regulated or scrutinised by any official body. As such, there are no measures in place to assure the safety of students or young people. Moreover, without regulation there is no evaluation of the quality of education or support for attendance and personal development. While some non-registered APs provide a culture of safeguarding and meet

students' needs, there is no way of truly knowing. Action taken by Ofsted's Unregistered Schools Taskforce has highlighted that some illegally unregistered (and therefore unaccountable) schools are putting the welfare of students at risk, which may also be true for schools which are legally unregistered due to their low numbers.

We believe this matter must urgently be addressed and we recommend that the threshold of five pupils must be removed to compel all AP to register at the end of a transition period. The registration system must be adapted to account for third-party providers – individuals or organisations who are contracted by a registered school to provide some or all of the education of a pupil – by bringing them under the jurisdiction of the school, and where appropriate re-labelling work-based learning which is not sufficiently educational as work experience.

If we are to prevent thousands more students and young people from being at risk, action must be taken now.



The need for quality Alternative Provision – the TLG story

Across the UK, there are students facing issues such as family breakdown, bereavement, drug and alcohol abuse, bullying, poverty, gang culture, mental or other illness, lack of parental support and other distressing circumstances.

It's seldom possible for a young person to battle through any of these without their education taking a damaging toll.

Statistics show that students who are excluded from school are more likely to be facing external circumstances, such as those listed above. For example, a child in receipt of Free School Meals is four times more likely to be excluded and a child with Special Educational Needs and Disabilities (SEND) is five times more likely to be excluded³. These students need more support and understanding, not to be uprooted and isolated.

That is why TLG Education Centres exist – to bring vital support for disadvantaged and excluded young people at a crisis point in their education. With over two decades of experience, TLG Education Centres offer a lifeline, giving young people the chance to catch up on missed qualifications, raise their aspirations and benefit from building blocks for a better life.

Our nationwide, Ofsted-registered, Education Centres offer a safe and nurturing place for young people to learn; young people are valued, cared for and their potential is championed.



We're passionate about enabling and equipping young people to return to mainstream school, to progress on to college or find work. We make sure they can maintain attendance and succeed in their next place of education, training or employment.

Each TLG Education Centre supports between 8 and 12 young people with a therapeutic approach. Young people follow a curriculum that is intentionally designed to meet their personal development needs, as well as securing understanding in Literacy, English, Maths and Science. A vital part of the curriculum is equipping students with the skills they need to approach learning tasks on their return to mainstream.

A priority for us at TLG is the high staff to pupil ratio, enabling our young people to receive the crucial pastoral support they need. Each centre is enhanced by volunteers alongside the teaching team in the classroom and through wider support to families.

3. <https://explore-education-statistics.service.gov.uk/find-statistics/permanent-and-fixed-period-exclusions-in-england>

A system of accountability, for some

All registered education settings, including TLG Education Centres, are regularly inspected by the national schools' regulator for England – the Office for Standards in Education, Children's Services and Skills, more commonly known as Ofsted.

Ofsted's role is to inspect all services providing education and care for students and young people. Ofsted carries out large numbers of inspections of schools, Alternative Provisions and other settings each week, assessing the quality of the setting and ensuring each is in line with safeguarding and quality standards. Its reports are publicly available, allowing parents and caregivers to make informed decisions about where to send their students.

Ofsted is independent from government. It makes parliament and the government aware of the independent assessments they have made of noticeable trends and areas of concern. Over the last few years, this has included raising concerns regarding illegally unregistered provision – those provisions who do meet the thresholds but are avoiding registration – in their annual reports⁴.

Despite the existence of regulation, a variety of different approaches to quality assurance have been allowed to develop across the country, with legal and illegal measures taken to avoid Ofsted registration and inspection. The current threshold for registration has therefore led to some educational settings, including Alternative Provision, operating outside of appropriate accountability and scrutiny.

Not only do these settings exist, but students are

sometimes referred to them by Local Authorities, who pay tens of thousands of pounds to these unregistered provisions to accommodate students in unknown and unregulated conditions⁵.

With such provision not subject to the scrutiny of Ofsted, there is no way of knowing whether they are fulfilling their role as educators or their duty of care to students. In addition, the Department for Education (DfE) and Local Authorities simply do not know where some students are or what levels of care and education are being provided in regards to unregistered provision or other situations⁶.

In 2016, Ofsted set up an Unregistered Schools Taskforce to try and locate, inspect and take necessary action on illegally unregistered educational settings. In 2019, as a result of the work of the taskforce, Ofsted estimated as many as 6,000 students were being educated in the unregistered settings it had inspected to date⁷, recognising the potential risk to these students as a result.

The true picture, though, is not known. Ofsted has acknowledged there are likely to be many more unregistered settings they have not yet discovered and have even called on the public for help finding them⁸.

While this taskforce focused on those illegally unregistered – those that exceed the threshold to register and thus are operating outside of the law – some of the principles and concerns can be paralleled when considering risks of those legally unregistered settings, in that there is similarly no accountability to educational and safeguarding standards.

4 <https://www.gov.uk/government/collections/ofsted-annual-reports> (accessed 27/11/2021)

5 <https://ffteducationdatalab.org.uk/2019/10/nobody-knows-how-big-the-unregistered-alternative-provision-sector-is/> (accessed 01/12/2021)

6 <https://www.bbc.co.uk/news/education-47899473> (accessed 01/12/2021)

7 <https://local.gov.uk/publications/children-missing-education> (accessed 01/12/2021)

8 <https://www.gov.uk/government/news/new-data-shows-illegal-schools-are-a-huge-nationwide-problem> (accessed 27/11/2021)

A threshold that must be tightened

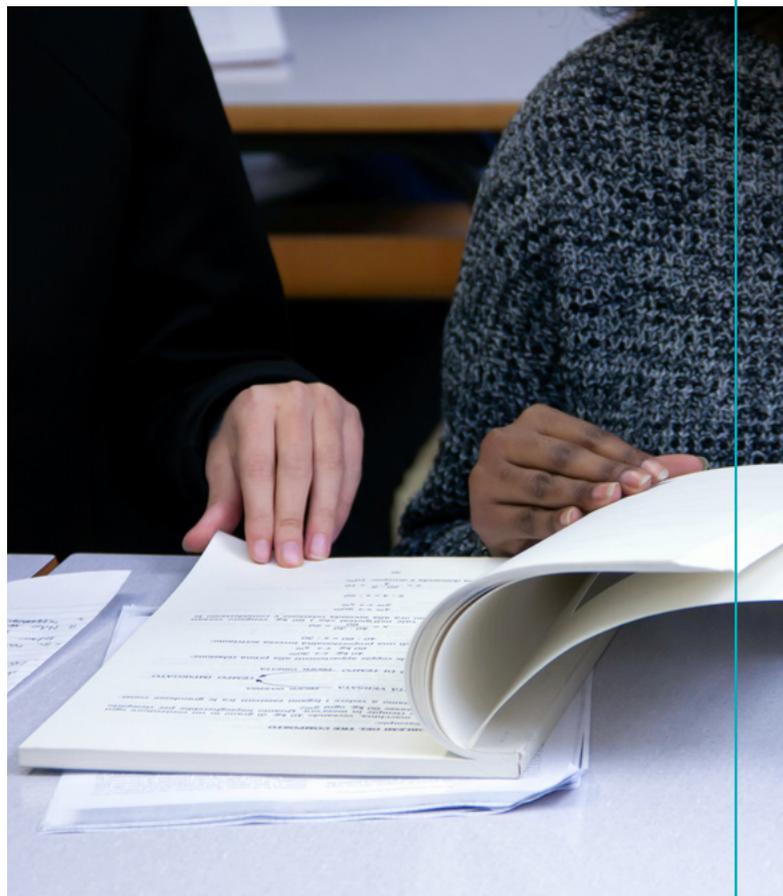
AP is a place of education for students who have been excluded from mainstream education, need additional support beyond what can be offered in a mainstream provision or, for whatever reason, were unable to flourish in a mainstream education environment.

AP can be state maintained or run independently (such as our nationwide TLG Education Centres.) Market analysis in 2018 estimated that around 14% of AP is independent⁹. As this paper explains, AP can also currently be registered or unregistered, depending on the criteria as set out in law.

While all state-maintained AP is registered with Ofsted, a common misconception is that all independent AP is unregistered, with the terms often being mistakenly used interchangeably. However, this is not the case. Many independent APs are registered, as required by law:

*'...any school at which full-time education is provided for five or more pupils of compulsory school age, or for one or more such pupils with an EHC plan or a statement of special educational needs or who is 'looked after' by a local authority, and is not a school maintained by a local authority or a non-maintained special school.'*¹⁰

This means that any AP which does not meet these criteria, is not legally obliged to register. As a result, many unregistered APs are at this moment operating within the law.



This threshold is allowing students to attend unaccountable, unregulated provisions, with no true idea of whether appropriate safeguarding or educational standards are being met, thus leaving students at risk of substandard care and education.

It is time this law was changed to eliminate this risk to students.

⁹ Department for Education, 2018. Market analysis of alternative provision. ISOS Partnership. (p.30)

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865049/BRANDED_independent_school_registration_guidance_21_August_2019Ms.pdf (accessed 27/11/2021)

Provisions may vary, but standards should not

Every child attending an AP should be confident of a high-quality education that meets all their educational, emotional and safeguarding needs. Unfortunately, this is currently not the case, as outlined in the Centre for Social Justice's 'Warming the Cold Spots' report.

*'The proportion of pupils in poorly rated provision in AP is significantly worse than in other school types. Nearly one in five pupils in AP are educated in a school rated Requires Improvement (RI) or Inadequate, compared to one in eight pupils in mainstream and only one in 20 in special schools.'*¹¹

With this naturally having an impact on a child's long-term prospects, again as evidence in the CSJ's report:

*'[There is] no area in the country where the rate of young people not in education, employment or training (NEET) after leaving AP equals even the very worst-performing area for children from mainstream.'*¹²

To enact this consistency of quality of AP for every student, there must first be a registration and standard of all AP, including Independent AP, which allows AP to achieve and be measured by the same standards across educational settings. This can be achieved primarily through systems already in place with Ofsted and clearly stated in the Independent School Standards.

There is a potential to build additional quality frameworks on top of this foundation. If such is used, these frameworks should be in addition to the requirements of the Independent School Standards with the purpose of supporting the development of a holistic understanding of quality Alternative Provision.

A variety of providers

Provision for a student attending AP can vary. Some students attend a single provision full time; others do a blend of part-time AP and part-time mainstream school, or will spend small amounts of time with additional third-party providers, who often provide access to vocational training opportunities.

The result is that vulnerable students can find themselves with a patchwork of sessions at different education providers across the school week. Whilst this variety may bring some benefits for pupils who have struggled in mainstream school, it can cause complexities and confusion, leading to a lack of clarity as to who is accountable for the education of the child.



¹¹ <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/05/CSJJ8057-Cold-Spots-Report-200507-v1-WEB.pdf> (accessed 22/03/2022)

¹² <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/05/CSJJ8057-Cold-Spots-Report-200507-v1-WEB.pdf> (accessed 22/03/2022)

Provisions may vary, but standards should not



As outlined in Ofsted's annual report 2019/2020:

'Most secondary schools inspected last year make use of at least one AP provider, and we know that some of these providers are unregistered. Just over a third of AP settings in turn commission the services of other providers, many of which are unregistered.

*In these sub-contracted arrangements, there is often a lack of clarity around who is monitoring unregistered AP. It is not always plausible that the original school can do so effectively: for example, in one case a single school had sent students to 16 registered and unregistered AP providers. In another case, over half of the pupils nominally attending an AP school were actually being sent to another AP setting. Schools and local authorities need to do much better to understand which AP settings are registered.'*¹³

Many APs work with other specialist providers to offer additional support to a child. Such examples could include equine therapy or specialist curriculum including physical education (PE) that cannot be provided by small APs in-house. This can also include important job-based learning such as construction. These provisions often have

a significant impact on the student's education and personal development, therefore access to them does need to be protected.

However, if the third-party provider caters for a small number of pupils and for less than full-time, there is no legal requirement for any form of registration or accountability while the student is in their care. While many of these organisations are doing important work supporting students, a statutory legal procedure must be put in place to ensure the safety and care of the student and reduce any risks. There are some vocational providers with large numbers of short-term or part-time placements, therefore they are responsible for the welfare of many students across the week.



¹³ www.gov.uk/government/publications/ofsted-annual-report-201920-education-childrens-services-and-skills (accessed 27/11/2021)

A continued call for action

The campaign for all AP to be registered is not new. Other organisations, including more recently Progress Education who, like TLG, operate a network of registered independent schools, have called for the same.

Ofsted, which galvanises knowledge of the sector across the whole of England, has been calling for this matter to be tackled for the past five years.

Since 2016, Ofsted's Unregistered Schools Taskforce (covering all unregistered schools, including AP) have consistently called for action to be taken on illegally unregistered provision, highlighting the risks associated with these which can also be translated to the risks associated with legally unregistered provision.

In its 2019/20 annual report, Ofsted stated that thousands of students are beyond the reach of their accountability and inspection system due to weaknesses in legislation around AP. This echoes worrying observations made in their last six annual reports. Moreover, its investigations have flagged concerning patterns regarding the inconsistencies in safeguarding and health and safety across

a significant number of illegally unregistered provisions, as outlined in its 2018/19 annual report:

'Since it was established four years ago, Ofsted's Unregistered Schools Taskforce has investigated over 600 suspected unregistered schools. Of these, we found reasonable cause to believe that an unregistered school may be operating in over 290 settings. We have inspected all of these. We found safeguarding or health and safety concerns in over a third of them and issued warning notices to 83 that we believe are unregistered schools.'
– (Ofsted 18/19).¹⁴

The taskforce has also proven the assumption that if a provider is not registered and consequently not held to account, quality of provision is lower on average – something that can be mirrored in legally unregistered AP, as well as the illegally unregistered as referred to in the report. In the case of unregistered AP, this leaves vulnerable students – who are most in need of quality care and education – at risk of substandard provision.

'What is clear from our work on provision for vulnerable students, whether in SEND, AP or social care, is that where our oversight is weakest (as in unregistered providers) or accountability is least clear (as in area SEND), the problems we find tend to be greatest. All students deserve high-quality education, care and health provision. We need the tools to make sure they get it.'
– Ofsted annual report 2019–20.¹⁵



¹⁴ www.gov.uk/government/collections/ofsted-annual-reports (accessed 01/12/2021)

¹⁵ www.gov.uk/government/publications/ofsted-annual-report-201819-education-childrens-services-and-skills (accessed 27/11/2021)



More recently, in November 2021 Ofsted launched an urgent inquiry into the number of primary-age students being educated in unregistered AP settings. Ofsted inspectors have found students being kept in what it described as ‘unregulated, unkempt and unsafe’¹⁶ conditions, with little effort being made to teach and support the students.

Amanda Spielman, Ofsted’s Chief Inspector, again used this as an opportunity to reiterate how important it is that the government makes it a legal requirement for all AP to be registered, describing some settings as ‘existing on the edge of the law’.¹⁷

Allowing students to be placed in unregistered settings of any kind – whether those operating within or outside of the law – is putting them at unnecessary risk. Safeguarding is utterly critical for every child, especially for more vulnerable students who are disproportionately represented in AP. A child’s safety, care and education should never be put at risk and any legislative threshold allowing this should be rectified as a matter of urgency.

A ban on placing students under 16 in unregistered care accommodation is already in place and, in a recent appearance before the Education Committee, the Secretary of State for Education confirmed he will move ‘at pace’¹⁸

to implement a compulsory register of home-schooled students. Considering the action in these areas to raise standards and ensure safeguarding, the legislation around unregistered school provision must duly be tightened too.

Robert Halfon MP, Chair of the Education Select Committee and former Education Minister, has also echoed calls for an end to unregistered provision, saying:

‘My own view is there shouldn’t be any such thing as an unregistered school. Every school, however small, should have to register. There has to be a massive crackdown by the government because of the poor education and safeguarding issues at these places. Post-Covid, as things get back to normal, this is the time for government to iron out this problem once and for all.’¹⁹

Our call for a full registration system is not a lone voice, but joining the continual and clear calls from many senior figures.

This is an issue that will not go away until action is taken.

¹⁶ www.gov.uk/government/publications/ofsted-annual-report-201819-education-childrens-services-and-skills (accessed 27/11/2021)

¹⁷ <https://www.theguardian.com/education/2021/nov/05/ofsted-investigates-rise-in-primary-age-children-in-alternative-provision> (accessed 01/12/2021)

¹⁸ <https://www.thetimes.co.uk/article/abuse-is-rife-in-illegal-schools-that-wriggle-round-the-law-z9pzwr7s> (accessed 01/12/2021)

¹⁹ <https://www.thetimes.co.uk/article/abuse-is-rife-in-illegal-schools-that-wriggle-round-the-law-z9pzwr7s> (accessed 01/12/2021)

The solution

While it is critical that the threshold be tightened, so no student is cared for in an unregistered provision, this needs to be done in such a way that prevents vulnerable students from falling out of the education system altogether after losing their place. Our recommendations, therefore, focus on how best to set up a system that makes allowances for transition, while not compromising on the safety or education of students.

Our recommendations:

1. Every school should be legally required to register with Ofsted

Every educational setting outside of the home, providing any of the 'suitable fulltime education'²⁰ required by Section 7 of the Education Act 1996, should be registered as a school with Ofsted. This should be irrespective of the number of hours of education offered or the number of pupils.

Registration with Ofsted will ensure that the governance, premises, curriculum and staffing are appropriate to the needs of the students, and highlight where this is not the case. The inspection framework will enable this to be assessed over time and accountability to be clear.

This recommendation is referring to the overarching educational setting, not the additional third-party provisions which are addressed in recommendations four and five.

2. Increase Ofsted's capacity to register and inspect

While some unregistered AP are offering sub-standard care, there are also some unregistered AP providing a quality education and safe settings for students. It is important to support such AP through the registration process, to ensure no good AP closes.

With at least 6,000 – likely more – students being educated in unregistered settings, there will be a significant number of AP needing to be registered. Such a spike in new school registrations would require additional Ofsted capacity to process registration and the associated inspection.

3. Increase independent Alternative Provision capacity

In addition to the unregistered schools needing processing, the Centre for Social Justice identified a number of cold spots in the country where current AP capacity is well below what is needed, or provision is of very poor quality. Requiring all APs to be registered and inspected will give a more accurate picture of where these cold spots remain and where urgent additional AP is needed.

TLG and other high-quality, registered independent school networks are well placed to open new AP schools to meet this need. However, they will require a school registration and inspection

²⁰ <https://www.legislation.gov.uk/ukpga/1996/56/section/7> (accessed 27/11/2021)

process that avoids the delays sometimes experienced in a system vital to the overall expansion of high-quality provision.

This could partly be achieved by expanding the Free School programme to include AP and giving additional incentives to open up new and high-quality AP through this programme. However, the minimum size for AP Free Schools is much larger than many independent AP provisions. Enabling the independent sector and organisations such as TLG to open more high-quality AP would allow greater choice for commissioners and more flexible solutions for children.

4. Vocational and supplementary training should be brought fully within the jurisdiction of the registered school

For a significant number of the students in AP, the various forms of vocational or supplementary training (as referred to earlier) significantly enhance the curriculum and help small school settings provide appropriate breadth of education and opportunity. There should be an end to the responsibility transfer which currently takes place when a third party is contracted to provide sessions as part of the school week. Currently the original educational setting is not fully responsible for the student during the time they spend with the third party.

We recommend that vocational staff should each work directly for the registered school, which could be on either an employed or self-employed basis. Each individual should be safely recruited, inducted, trained and supervised as an integral member of the school team.

Specialist premises or resources – such as use of a stable – should be procured separately from the provision of staff, with both the registered school and the provider of the premises taking responsibility for the safety and upkeep of any premises and equipment.

These recommendations for staff and premises would mean that the same lessons and provision can be accessed by the students, but the responsibility of the child's welfare is clear and the systems in place are consistent across the whole of the school week.

For example, students may attend equine therapy once a week for three hours, receiving a service provided by a local stable and paid for by a registered school. As the law currently stands, they are attending an unregistered school where accountability for the student is unclear and the provision is outside of any formal regulation. However, under the proposed system of staff working directly for the registered school, a specialist staff member could be recruited, inducted, trained and supervised by the school and then deliver a three hour vocational lesson at the stables. It's clear



that for that designated period of time, the staff member, whether working on an employed or self-employed basis, is fully a part of the school staff team. The other component is the procurement of access to the stables for at least the period of the lesson. The stables would be paid by the school to provide a safe environment and allow the designated staff member to deliver the vocational lesson using their premises, but not be expected to take any responsibility for the quality of education.

Additionally, within the range of AP settings, there are some excellent examples of the way that the curriculum can be enriched by joint delivery where teaching staff from the registered school fully supervise activities delivered by third party organisations.

For example, outdoor pursuit activities can enable young people to grow in confidence and access new experiences. Many AP settings therefore work with specialist providers for activities such as canoeing, abseiling, or raft building. It's common that school staff will supervise a group of young people for the duration of the activity, with outdoor activity instructors providing the specialist instruction. Although appropriate vetting and risk assessment are essential for any external activity, throughout the entirety of these activities, responsibility clearly remains with the school.

5. Work-based placements should be redefined as 'work experience'

Another area where the responsibility of a student can transfer away from the educational setting is work-based placements. This is where a school may arrange for a student to access a work placement for a set part of the week (for example, two days). This can be hugely beneficial for the student and their future prospects, but again can cause ambiguity as to where the responsibility for the student lies during the placement.

Many vocational placements for school-age students have more in common with 'work experience' and should be treated in the same way as any work experience placement. The safeguarding arrangements for work experience should be considered – including risk assessment and levels of supervision. Students accessing these opportunities from AP are often vulnerable and there is a large disparity between the safeguarding arrangements within an education setting and many work places.

When a student attends work placements over a longer term, they are missing learning in core subjects, which will impact their GCSE results. A maximum period of time should be stipulated for work experience or placements in each school year in order to limit the impact on the qualifications students could gain.





Any situation where the care of a child – however occasional – may transfer must be addressed as part of any changes to the registration system. Additionally, as the government continues to reflect how it can better provide skills-based education for young people as part of its levelling up agenda, work-based placements could and should play a more prominent role in the educational experience of young people both in AP and mainstream education.

More broadly, we would highlight the opportunity for mainstream and registered AP schools to develop a programme of on-site vocational learning to better meet the needs of children who would benefit from a more practical education.

6. Transition arrangements should be used to avoid a detrimental impact on students whose needs are being safely met

We recommend a transition period of two years from the moment plans are finalised and brought into law. During this time, guidance, training and support could be given to providers working their way through registration. This transition period would give time for AP providers to revisit their contracts with third-parties in order to move towards the system as recommended above. However, with the COVID-19 pandemic causing ongoing disruption to schools and to Ofsted, this transition period could be extended accordingly. This flexibility is especially significant given that Ofsted would need to inspect all new schools, when they are currently already catching up on inspections that were unable to take place during the pandemic.

7. A grant programme should be used to enable both the transition to registration and the development of new registered independent AP

High quality registered AP meets the needs of students unable to access mainstream school by providing broader opportunities and much needed specialist services, such as therapeutic interventions. These options are a lifeline for pupils, parents and those with responsibility for providing students with education. The creation of this high-quality independent AP is not a cost to the state but offers huge benefits. Its retention and development should therefore be encouraged through a transitional grant programme, which could include a focus on cold spots and those areas not well served by existing provision. For providers moving to regulated provision, additional administrative capacity will be required, which due to the small nature of these provisions, many will not have.

Conclusion

There are currently an unknown number of students being educated in unregistered schools, whether illegally or legally unregistered, though it is thought to be in the thousands. These students, many of whom are likely to be vulnerable, are being put at risk of sub-standard care and education in the very place they should be safe and secure.

To ensure that every student who attends AP is safe and receives a high-quality education which meets their needs, the threshold that currently allows some AP be unregistered must be removed. This is not a new call-to-action, but one which has been echoed over recent years by Ofsted and others across the sector.

There are a range of actions that can be taken to ensure all AP is registered and regulated. You can view all our other recommendations on P11. These recommendations include third-party providers being brought under school jurisdiction, redefining

work-based placements as work experience and implementing a managed transition period to ensure the changes do not have a detrimental impact on any child's education.

Finally, in addition to the steps that would bring all current AP into registration, there must also be a focus on equipping local areas and national bodies – like TLG – to open more high-quality AP. The lack of such provision has led to too many children being placed in unregistered and often sub-standard provision due to a lack of other options.

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