

ADCS Position Paper

A VISION FOR AN INCLUSIVE AND HIGH PERFORMING EDUCATION SYSTEM

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The Association of Directors of Children's Services Ltd



A vision for an inclusive and high performing education system

Executive summary

Local authorities (LAs) have a legal responsibility to champion the needs of the most vulnerable children and young people, to promote educational excellence and ensure fair access to school places for all learners. The education system is experiencing a prolonged period of change; an ongoing lack of clarity around the roles of key players and the absence of a single, overarching strategy which knits together the myriad different reforms, reviews and developments under a single, coherent narrative is keenly felt. As such ADCS is concerned that discordant and unconnected actions are creating an imbalance in the performance of local education systems, resulting in too many learners not having access to the quality of education to which they are entitled. ADCS members believe we must strive for an inclusive education system that enables all children, whatever their ability, background or faith to realise their ambitions, providing learners with greater opportunities to learn from, and relate to, their peers.

The lack of an holistic accountability system together with the pressures of greater competition and diversity in admissions arrangements as well as a high-stakes inspection regime further increases the risk of some vulnerable children and young people being squeezed out of the mainstream system or falling out of sight all together. Learners who are excluded are more likely to have special educational needs, be eligible for free school meals, come from certain black and ethnic minority backgrounds or be in care. This cannot be right, particularly when we know that the social and financial costs of allowing children to get to the point of exclusion are huge; for many this is the first step on a journey that ultimately ends with social exclusion in adulthood too. Children and young people are rarely excluded from school for their own best interests.

The present national arrangements for education lead to a lack of local coherence. Parents and carers continue to look to the LA to address concerns or complaints regarding their child's education. This is understandable, LAs offer a single point of contact, are democratically accountable to local communities and hold specific duties with regards to school standards, special educational needs, safeguarding, and children in care. These duties apply to all children, in all schools yet the freedoms offered under the academies programme present practical barriers e.g. LAs cannot legally intervene in an academy school when performance is giving concern. ADCS believes education is best delivered in a locality via genuine partnership, with all players working in concert to ensure that all children and young people receive a good education, and that they, and their families, are treated fairly and equitably. This is not the case at present and learners' outcomes are put at risk by this uncertainty.

It is clear that the overall quantum of funding for education and skills is insufficient despite this budget being ringfenced by the Department for Education from year-on-year budget reductions since 2010. Education should be seen as an investment, not a burden. An urgent review of the levels of capital and revenue funding for the education of all children and young people is required. If the case cannot be made to the Treasury for additional investment, then an honest conversation about better use of available funds must take place – the current system is duplicative and overly bureaucratic. Further, the government must stop placing new duties and burdens on schools without having a clear understanding of the impact and cost of these actions. The ability of LAs to continue meeting shortfalls in central education funding is compromised by a 49% real-terms reduction in funding since 2010. Our public services are at breaking point.

The recommendations made in this paper include the development of a coherent vision and strategy for the education system; a wholesale review of admissions arrangements; and, an open and honest discussion about the return of an academy to the LA family of schools when a multi-academy trust either fails or hands back a school when an alternative sponsor cannot be found.

A vision for an inclusive and high performing education system

1. Introduction

- 1.1. Local authorities (LAs) have a legal responsibility to champion the needs of the most vulnerable children and young people, promote educational excellence and ensure fair access to school places for all learners. These duties are clearly set out in the Department for Education's (DfE) statutory guidance on the role of the director of children's services (DCS). The DCS acts as a clear and unambiguous line of professional accountability for children's wellbeing in a local area and is tasked with working in partnership with headteachers, governors, academy sponsors and principals to promote educational excellence, take rapid and decisive action in relation to poor performance and promote high standards.
- 1.2. ADCS is concerned that discordant and unconnected actions are creating an imbalance in the performance of local education systems. An ongoing lack of clarity around roles and the absence of an overarching strategy which knits together the myriad different reviews, developments and measures under a single, coherent narrative is keenly felt. Conversely, the role of the DCS with regards to safeguarding and child protection is unequivocal and '[Putting children first](#),' (DfE, 2016) offers a clear vision for the multiple strands of government's reform of children's social care, equivalent clarity is required for the education system.
- 1.3. The education system is going through a prolonged period of change. In addition to significant structural, curriculum and funding reforms, the government has undertaken multiple reviews and consultations and published a number of reports over the last 12 – 18 months on exclusions, home schooling, integration, education in the North of England, the creation of new school places and the outcomes of learners in residential special schools. The role of the virtual school head has expanded, a vision for the future of alternative provision is under development as are the Department's principles for a clear accountability system.
- 1.4. Parents and carers continue to look to the LA to address concerns or complaints regarding their child's education. This is understandable, LAs offer a single point of contact and are democratically accountable to local communities and hold specific duties with regard to school standards, special educational needs, safeguarding, and children in care. These duties apply to all children, in all schools yet the freedoms offered under the academies programme present some practical barriers e.g. LAs cannot legally intervene in an academy school when performance is giving concern.
- 1.5. ADCS believes education is best delivered in a locality via genuine partnership, with all players working in concert to ensure that all children and young people receive a good education, and that they, and their families, are treated fairly and equitably. We believe the characteristics of an effective education system to be as follows:
 - Exclusions and exclusionary practices are rare and systemically unacceptable;
 - Sustainable in terms of school places, without either excessive surpluses or deficits locally;
 - There is a clearly defined framework of accountability so that the performance of all schools can be monitored in a consistent way, and the early signs of decline, including poor financial management, are addressed in a timely and decisive way to minimise the impact on learners' outcomes; and, the role of all agencies and partners is clear;
 - The needs of the most vulnerable learners are not only recognised but prioritised at every stage and by all players in the education system;

- Fair access to local school places is encouraged via admissions policies that are straightforward and consistently applied, with rapid redress where problems arise;
- There is a sufficient supply of high quality teachers across all subject and all geographical areas;
- Learners are prepared not just for the world of work or further study but to be active, productive citizens;
- Financially sustainable with an equitable distribution of resources in line with needs;
- School-to-school collaboration is supported, excellence is shared, and local leaders also work together to tackle issues that affect more than one school;
- Good governance is both promoted and valued, school leaders are held to account and the rights and interests of learners are promoted above all else;
- Schools play a leading role in promoting cohesion within the school and beyond, schools are a vital community asset and central to place-based working.

1.6. The lack of an holistic accountability system together with the pressures of greater competition and a high-stakes inspection regime further increases the risk of children and young people being squeezed out of the mainstream system or falling out of sight due to exclusion, unacceptable delays in admission processes or because they are educated other than at school e.g. at home or in unregistered settings. This cannot be right, particularly when we know that the social and financial costs of allowing children to get to the point of exclusion are huge; for many this is the first step along a journey that ultimately ends with social exclusion in adulthood too.

2. Sufficiency of school places

- 2.1. The education system in England is in the midst of a prolonged period of change. New types of school, including free schools, studio schools and university technical colleges (UTCs), have been introduced and as of January 2017, 68% of secondary pupils and 24% of primary pupils were taught in academies. These developments have brought the DfE and the Education and Skills Funding Agency (ESFA) closer to the day-to-day delivery of education in thousands of schools, with the latter taking a leading role in the approval and siting of new free schools despite the duty to ensure a sufficiency of school places remaining with LAs. DfE estimates suggest that between 2015/16 – 2019/20 there will be a 3.9% (174,000) increase in primary school pupils and a 10.3% (284,000) increase in secondary school pupils yet LAs cannot open new schools to meet local need. Moreover, since 2010 [66 new free schools](#) or UTCs have closed, partially closed or failed to open at a cost of almost £150 million to the tax payer.
- 2.2. In recent weeks, the DfE has published its [plans](#) to create more school places - £50 million will be made available in 2018/19 to support the expansion of existing grammar schools and a capital scheme to support the creation of new 'voluntary aided' (VA) schools by faith and other groups was also announced. Taken together, these measures will not solve the chronic shortage of school places in certain areas of the country, particularly in the core cities, nor will they help all children reach their potential – only 36 out of the 152 LAs have at least one grammar school in their area. In a [2008 study](#), the Sutton Trust explored the wider impact of grammar schools 'creaming off' the brightest pupils in a locality, noting: "... there is some evidence that children who attend non-selective schools in selective areas may not fare as well academically – both compared to local selective schools and comprehensives in non-selective areas." This raises a serious question about the educational experiences of the population of children who are not selected - if apparent improvement in one institution comes at the cost of depressed performance elsewhere, then there is no net gain at the system level.

- 2.3. ADCS members believe we must strive for an inclusive education system that enables all children, whatever their ability, background or faith to realise their ambitions, providing learners with greater opportunities to learn from, and relate to, their peers. Schools play a vital role in furthering community cohesion and plans for new VA schools, which will be able to select up to 100% of their intake on the basis of faith, are starkly at odds with the measures to boost diversity in admissions outlined in the government's [Integrated Communities Green Paper \(2018\)](#). Indeed, the DfE recently considered and discounted the possibility of lifting the 50% faith cap on free schools to support integration. **A coherent capital plan, that benefits all schools and all learners is urgently required**, growing numbers of schools are falling into a state of poor repair and/or are becoming increasingly overcrowded. **A clearer, collective process for approving new schools and for the expansion of existing schools is required to ensure children's needs are met and best use of scarce public funds is achieved.**

3. Oversight of school performance and system accountability

- 3.1. The education reforms from 2010 to date have introduced myriad new players to the 'middle tier,' including over 1000 multi-academy trusts (MATs), eight regional schools commissioners (RSCs) and multiple headteacher boards (HTBs) and sub-regional improvement boards. **More needs to be done to create coherence across the diverse school system. There is a growing need for a common accountability framework for all schools** to facilitate a culture of openness and trust against a backdrop of increased competition along with unambiguous guidance on the role of key players in the system. In May 2018, the DfE published its principles for a clear and simple [accountability system](#). ADCS would welcome discussions with the Department and other key stakeholders about this piece of important work, including the introduction of accountability factors to influence behaviours e.g. exclusion rates playing a more meaningful role in school inspection judgements.
- 3.2. LAs are prevented by law from intervening in individual academy schools when performance concerns arise. Instead, LAs seek to work with RSCs to ensure effective support is made available, however, the vast geographical areas RSCs oversee can lead to delays – each region has on average 2,600 state schools ([Education Select Committee](#), 2016). It is the view of ADCS that RSCs are insufficiently accountable; the balance of power and influence between the RSCs and their HTBs is unclear, yet the dynamic between the two is at the heart of the governance system. The www.gov.uk website provides limited information about RSCs, their staff teams and financial accounts. Likewise, published records of regional HTB meetings are sparse. More transparency is needed to ensure RSCs are held to account. In 2016, the Education Select Committee recommended the DfE should develop a **protocol for the interaction between RSCs and LAs to ensure there is a shared understanding of roles**, which would improve transparency and should also address practical arrangements to tackle collectively academic, financial and inclusion-related concerns in individual schools, regardless of status or designation.
- 3.3. We have long had a mixed economy of provision and diversity amongst the providers of education in this country. LAs have worked alongside diocese and other faith and community groups involved in the running of schools for many years, however, the growth of the academy and free schools programme has brought a new level of complexity, particularly when the performance of a MAT is giving concern. In extremis, MATs can hand back poorly performing schools leaving them in limbo whilst a new sponsor is sought - school leaders are unable to make significant decisions during this hiatus, yet this process can take months. **In such cases ADCS believes the governing body should have the option of returning to the LA family of schools.** Whilst the detail of this process must be worked through, particularly if financial

mismanagement at MAT level has occurred, the interests and outcomes of learners must be at the forefront of decisions at all times. Indeed, the [Education Policy Institute](#) (EPI) (2018) recently compared the performance of schools in MATs and LAs and found that the type of school – academy or maintained – is less important than being in a high performing group. Both MATs and LAs featuring at the very top, and the bottom, of the EPI's performance tables.

4. Supporting our most vulnerable learners

- 4.1. As of January 2017, 48,000 learners were educated either exclusively, or primarily, in the alternative provision (AP) sector. Children who are eligible for free school meals, who have special educational needs and/or disabilities (SEND), learners from some black and ethnic minority backgrounds and children in care are more vulnerable to exclusion than their peers. ADCS therefore welcomes the DfE's independent review of exclusions and the work on developing a vision for alternative provision, both of which are ongoing.
- 4.2. Children and young people are rarely excluded from school for their own best interests. According to the DfE, the [number](#) of permanent exclusions across all state-funded schools increased to 35 per day in 2015/16, up from a daily average of 30 in 2014/15, most commonly for persistent disruptive behavior. Worryingly, the rate of exclusion among children aged four and under grew at a faster rate than any other age category. This practice cannot be condoned, as exclusion inevitably leads to a period out of education, often for children whose educational performance is already less than that of their peers, which only serves to further exacerbate disadvantage.
- 4.3. The reasons underlying the growth in exclusions are complex. Anecdotal evidence from ADCS members suggests that some schools are using exclusion (both formal and informal) as a behavior management tool because they are struggling to meet the needs of vulnerable learners whilst sustaining rapid improvement, or as a means of gaming exam outcomes. It should be noted that it is illegal for schools, but not sixth forms, to exclude solely on the grounds of educational attainment. A recent analysis of school census data by [Education Datalab](#) (2018) identified somewhere in the region of 7,000 learners left secondary school in advance of sitting their final exams and never reappeared in another school; it is not clear where these children have gone or whether they completed their studies at home. ADCS members are convinced that a growing number of exclusions could have been averted if more resources were available for pastoral and classroom support.
- 4.4. We do not know how many children and young people are educated other than at school nor the reasons why. The results of a recent [survey](#) by ADCS suggested in excess of 45,500 were known to be home schooled in 2017/18. We recognise that parents have the right to home school and where they choose to do this, we want it to be a positive experience. This is best achieved when parents and LAs recognise each other's rights and responsibilities and work together. Concerns arise when the decision to home educate is not a well-informed, considered decision but as a result of the relationship between a school and family breaking down, or when it is used as a cover for an informal exclusion or, in a small but worrying number of cases, is a further symptom of parental abuse and neglect ([DfE](#), 2016).
- 4.5. We know that home schooling can also be utilised by parents and carers as a method for avoiding attendance fines or a cover for attendance at unregistered education settings. These 'illegal schools' operate covertly under the guise of part-time provision meaning LAs cannot assure themselves that children attending them are safe, well and receiving a suitable education. **A reasoned debate about home schooling is required. Children's wishes and**

their rights in terms of socialisation, health, and education must be at the forefront of this exercise along with ensuring that risks, however small, are minimised. It is important that the government also seeks to address the links between home schooling and attendance at unregistered education settings by **robustly pursuing the prosecution of the proprietors of all unregistered settings deemed to be operating illegally as a school**, as well as anyone who covers up such unlawful operations. This is an immensely complicated matter and ADCS members stand ready to assist the DfE and Ofsted in this task.

5. School admissions and fair access for all

- 5.1. The growing complexity of admissions arrangements are confusing for parents and carers and increasingly difficult for LAs to oversee - some LA areas now have in excess of 200 individual admissions authorities in operation. And, where MATs operate across multiple LAs, the decisions they take as a collective, can at times, be incompatible with established local arrangements and produce unfair outcomes. ADCS supports calls for **the production of dedicated guidance for MATs and the granting of coordinating in-year admissions duties to LAs in respect to all publicly funded schools** to minimise the risk of children, including those in the care of the state, who despite a presumption of priority access, are often out of school for significant periods of time. LAs do not have the power to direct an academy or free school to admit a child and the established route of challenge with the EFSA is not fit for purpose and can result in a gap in formal schooling which can last weeks or even months and once lost, this learning cannot be regained. Consequently, DCSs cannot fulfil their corporate parenting responsibilities in terms of improving attainment and providing stable education placements for children in care. **ADCS believes LAs should have the power to compel any state-funded school to admit a child in care, where there is space to do so.**
- 5.2. More broadly **ADCS believes a wholesale review of admissions guidance and processes is required.** As more and more state schools convert to academy status these arrangements are increasingly being exercised at a school, or MAT level. The emphasis should always be on fairness for children, parents, and carers rather than the convenience or institutional advantage of schools. **Locating the admissions authority above individual school level offers greater transparency and efficiency.**

6. Recruitment and retention of high quality teachers

- 6.1. National teacher recruitment targets have not been met for several years and a significant number of teachers leave the profession each year despite new routes of entry opening up e.g. Schools Direct and TeachFirst. A new post-graduate teaching apprenticeship is also in development. Whilst innovation in this regard is welcome, teacher sufficiency remains a significant challenge for school leaders and the whole system. The size and scale of this issue is varied across phases, sectors, geographical locations and specialisms with national figures masking crises in some hotspots e.g. coastal towns, Catholic schools and English and maths subject leaders. In 2017 an [Education Select Committee](#) inquiry into teacher recruitment and retention recommended **the development of a long-term, evidence-based plan to tackle challenges associated with the supply of teachers**, which prioritises recruitment in subjects and geographical regions with the greatest shortages, seeks to improve the recruitment pipeline and treats retention with equal weight. ADCS believes this should be underpinned by a concerted effort to build a coherent narrative about the rewards of working in the teaching profession and the routes of progression available.

- 6.2. The main factor in retention identified by school leaders is teacher workload. Earlier this year, the DfE published a teacher workload [action plan](#), however, this does not clearly set out how it expects workloads to change nor does it contain an honest stocktake of the drivers of rising workloads e.g. flat cash budgets, embedding curriculum reforms, new accountability measures, and the cumulative impact this has on teachers.

7. Preparing learners for the future and promoting social mobility

- 7.1. Education is about more than the acquisition of qualifications, it is about promoting resilience, wellbeing, strong economic prospects and engendering citizenship. The national curriculum of the day should prepare young people to make the successful transition from adolescence to adulthood and, crucially, it should be relevant to their lives. A range of new performance measures have been introduced in recent years, including times tables, grammar and spelling tests at primary level and the EBacc at secondary level, which prioritise academic attainment over the acquisition of the softer skills valued by employers e.g. communication, problem solving and team work.
- 7.2. Children and young people are less likely to achieve good outcomes or continue with further studies if they are detached from the education process. A growing number of learners do not see a narrow, academic curriculum as relevant to their lives, now or in the future. Research by the [University of Warwick](#) (2015) highlights the significant decline in the number of state schools offering arts subjects, including drama and design technology, taught by specialist teachers. The downgrading of the arts via its omission from the Ebacc and the introduction of the 'Attainment 8' performance measure is exacerbating to this situation. The rising levels of anxiety about the introduction of the new, largely exam-based, GCSEs, and the impact this is having on the mental health and wellbeing of children and young people have hit the [headlines](#) in recent weeks. The pressure created by accountability systems rooted in raw exam scores is another reason why only a broader focus can hope to produce better overall social outcomes.
- 7.3. We know that not everyone learns in the same way yet vocational routes remain chronically undervalued despite a government pledge to deliver three million new apprenticeships by 2020. In 2015, the then HM Chief Inspector of Schools, Sir Michael Wilshaw, warned that too many [apprenticeships](#) were of poor quality and failed to provide the skills and knowledge that employers need. The development and introduction of 'T Levels' presents a valuable opportunity to shift public thinking and create a 'gold standard' vocational route.

8. Sustainable finances with an equitable distribution of resources

- 8.1. Although the DfE's schools budget has been protected from year-on-year reductions in public funding since 2010, the overall quantum of funding allocated to schools is insufficient. The [NAO](#) (2016) estimates that schools will experience an 8.0% real terms reduction in per-pupil funding between 2014/15 and 2019/20 due, in part, to the projected school-age population increase, inflation and greater staffing costs e.g. the apprenticeship levy plus higher National Insurance contributions. This has impacted on the numbers of teaching assistants and pastoral staff as well as equipment budgets, leading to a greater reliance on parents, local businesses and fundraising efforts to provide classroom resources, including stationary and textbooks.
- 8.2. The government's special education needs/disabilities (SEND) reforms were ambitious and aspirational. The *Children and Families Act (2014)* rightly extended support for children and young people with SEND from birth to age 25, however, the funding provided by central government to implement these reforms is insufficient to meet the needs of this extended cohort

of learners. Indeed 68 out of 85 LAs responding to an [ADCS survey](#) (2017) reported an overspend on the high needs block budget in 2016/17 totalling £139.5 million with a shortage of local specialist educational provision resulting in greater dependence on the more costly independent sector and higher associated transport costs, cited as key pressures. Growing numbers of pupils accessing AP represents another budget pressure and it appears that a LA's ability to transfer money between different funding blocks of the dedicated schools grant to support inclusivity will be limited under the new national schools funding formula, yet our ability to call school leaders to account for their decision to exclude a pupil has been weakened in recent years. **ADCS believes budget responsibility and accountability for exclusions and AP arrangements should be integrated and rest with schools.**

- 8.3. The withdrawal of the £600 million Education Services Grant from LAs at the end of the last academic year is a significant concern, as well as covering back office functions, it supported students with additional needs to achieve their potential. More broadly, LAs have experienced a 49% real-terms reduction in funding since 2010 ([NAO](#), 2018), further limiting our ability to continue meeting shortfalls in central education funding.
- 8.4. It is right that additional funding is allocated to help raise the attainment of disadvantaged students, however pupil premium funding is not ringfenced and **the DfE has not yet published comprehensive guidance on 'what works' in supporting disadvantaged pupils and how such funding can be used to best effect.** This is urgently required. As the funding pressures schools experience grow, so too does the risk that this targeted funding is used to subsidise core education functions. Although there has been some progress in 'closing the gap,' research by the [Education Policy Institute](#) (2017) found that the most persistently disadvantaged (those that have been eligible for free school meals for in excess of 80% of their school lives) have fallen further behind their peers, and are now on average over two years of learning behind non-disadvantaged pupils by the end of secondary school.
- 8.5. Childcare has been, and remains, a significant national political priority and investment is set to rise to £6 billion by 2020 as the 'free' 30 hour offer for three and four year olds rolls out nationwide. This is a staggering sum yet the shortfall between the hourly rate offered and actual costs of delivery is jeopardising quality and there are growing concerns that children from the most disadvantaged backgrounds are not benefitting from this policy and may even be disadvantaged by it ([NAHT](#), 2018). The [Sutton Trust](#) (2017) similarly voiced concerns about the focus on quantity over quality: "Investments in affordability are welcome, but neither the tax-free childcare scheme nor the 30-hour entitlement for working families are well-designed to promote social mobility." At present parents and carers with a taxable income of £199,000 have the same entitlement to subsidised childcare as those who are working for the equivalent of the National Minimum Wage or the Living Wage for 16-hours per week. **ADCS believes available early years funding should be targeted towards the most vulnerable children and families.**
- 8.6. Despite the raising of the participation age to 18 years in 2015, funding for further education and sixth forms has not kept pace with increases in the education budget elsewhere. Indeed, an analysis of public spending on children's services by the [Children's Commissioner](#) (2018) estimated that there has been a 17% real-terms fall in post-16 per pupil spending since 2009/10 meaning it is likely to be around the same level, in real terms, as it was in 1989/90. The report noted: "A lack of real-terms increase in spending per pupil over such a long period of time is remarkable and it will inevitably leave resources squeezed. By way of comparison spending per pupil in primary and secondary schools has risen by more than 75% over this 30-year period."

- 8.7. Education should be regarded as an investment, not a burden. **ADCS would welcome urgent discussions with the DfE and the Treasury about the levels of capital and revenue funding for education at all levels and in all phases.** Members of ADCS are ambitious for the nation's children achieve at the highest levels in order that the country successfully competes in an increasingly competitive, global economy. If new funding cannot be found, then a frank conversation about the best use of the funds available for education must take place – there is significant duplication in the system as a result of ongoing reforms and elements of it are overly bureaucratic. Further, the government must stop placing new duties and burdens on schools without having a clear understanding of the impact and costs of these actions.
- 8.8. LAs are ambitious about improving children's life chances but a series of conflicting priorities and national policy initiatives in relation to education, children's services and family life coupled with dramatic reductions in public sector funding are increasingly affecting our ability to improve outcomes. Today there are four million children living in poverty, two thirds of whom live in working households. It is concerning for ADCS members that **England does not have a national child poverty reduction strategy**, particularly in light of the Institute of Fiscal Studies prediction that this figure will rise to 5.2 million children by 2022. Poverty constrains opportunities and it constrains a child's ability to learn. Schools have acted as a safety net for families by seeking to 'poverty proof' the school day via the provision of uniforms, food, sanitary products and other forms of informal help and support to pupils and their families. For far too long dedicated school leaders, teachers and support staff have gone above and beyond what is expected of them to meet the wider needs of their learners. This last line of defense is now at risk and it is imperative that the government takes action sooner rather than later.

9. Recommendations

The recommendations that follow here have largely been put forward as solutions to the systemic issues in the oversight and arrangement of schools in England by others, including influential select committees and we add our voices to these calls. The majority of these recommendations are directed towards the Department for Education as the one body in the sector with oversight and powers to affect change. ADCS members stand ready to assist with this task:

- 1) The DfE should develop a coherent vision and strategy for the education and schools system in consultation with key stakeholders, one which recognises the importance of place, the role of the LA, prioritises equality of access and the interests of vulnerable learners.
- 2) The DfE should develop a comprehensive recruitment and retention plan for the teaching workforce, in consultation with the sector.
- 3) The DfE should develop coherent admissions guidance for all schools, MATs and parents/carers. The needs of learners should be at the heart of this, not the advantage of institutions.
- 4) Sub-regional school improvement boards should have a priority focus on tackling and minimising exclusions, this will help to clarify the role RSCs have in terms of accountability for tackling exclusions and the illegal off-rolling behaviours of some schools.
- 5) The DfE should take forward the recommendation for a protocol for consistent working between LAs and RSCs across all regions to ensure that children's rights are not lost in bureaucracy.
- 6) The DfE should build on current accountability arrangements for the local schools system to ensure a coherent and equitable approach to the provision of sufficient, good quality school places for all school-aged children.
- 7) Where a MAT has failed and/or walked away from one or more of its schools and a suitable sponsor cannot be found, the school's leadership team and governing body should have the opportunity to consider returning to the LA family of schools. The current situation is untenable in terms of children's outcomes.
- 8) The DfE, working in partnership with relevant stakeholders, including schools, should produce guidance on the effective use of pupil premium monies to ensure this investment is having the desired impact on vulnerable learners' outcomes and life chances.
- 9) The DfE should reinstate LA powers to co-ordinate in-year admissions in respect of all children.
- 10) Further, LAs should have the power to compel any state-funded school to admit children in care, where there is space to do so.
- 11) The DfE should either commission research or initiate a stocktake to understand the impact of its curriculum reforms. This activity should engage a wide range of stakeholders including school leaders, teachers and learners themselves to ensure children and young people are being adequately prepared for the future.
- 12) The government should develop a child poverty reduction strategy for England, this should have a keen focus on education, skills and social mobility.
- 13) Ofsted should retain a focus on inclusion in current school inspection activity and future frameworks for school inspections should enable effective scrutiny in this area.
- 14) Available early years funding should be targeted at the most vulnerable children and families therefore the eligibility criteria for subsidised childcare should be reviewed.
- 15) LAs should work together with schools, RSCs and officials at the DfE to make the case to the Treasury for greater investment in all schools and all learners as a matter of urgency.

The Association of Directors of Children's Services Ltd (ADCS)

ADCS is the national leadership
association in England for statutory
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