

DRAFT

**Special Educational Needs & Disability
(SEND) School Place Commissioning
Strategy**

2018 / 2019

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1. Introduction

This is the draft Special Educational Needs & Disability (SEND) School Place Commissioning Strategy for Solihull Council which seeks to set a baseline for specialist provision across Solihull and consider a range of factors that are driving the need for change over the short to medium term. This strategy provides information regarding the current and future SEND pupil population and draws conclusions regarding the potential need to add or make changes to specialist provision.

The aim of this strategy is to help the Council, schools, parents and the wider community understand the need for specialist provision planning and to establish future demand. It will provide a basis against which future specialist provision will be planned.

The data within this strategy is based on a range of sources including SEN2 and the January pupil census. Where possible it is based on January 2018 data. Data sources used are indicated throughout the document.

1.1 National and Local Policy Context

The Government's vision for children and young people with special educational needs (SEN) and disabilities is the same as for all children and young people - that they achieve well, and lead happy and fulfilled lives. The Children and Families Act 2014 places important statutory responsibilities on local authorities for supporting children and young people with special educational needs (SEN) and disabilities. This is a vital role that local authorities retain in an increasingly school-led education system and one that requires long-term strategic planning, informed by detailed local knowledge enhanced through consultation with parents and carers, and good relationships with local schools.

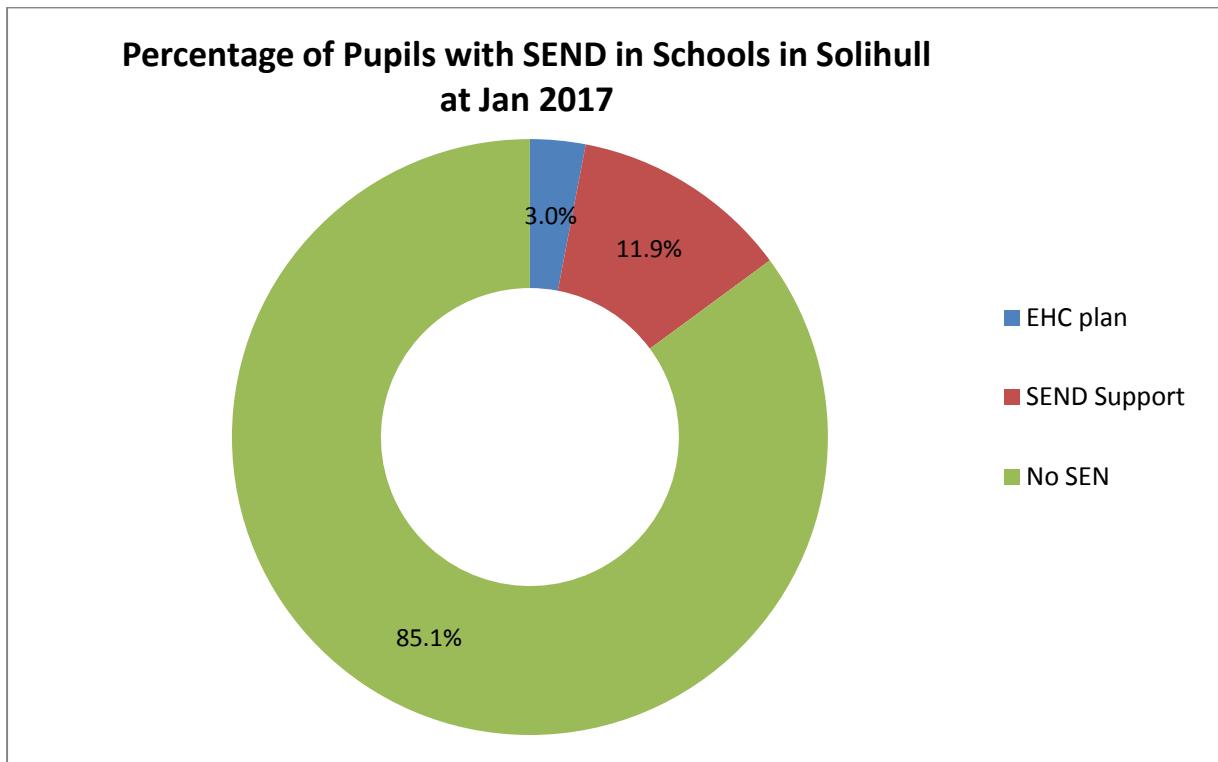
Local authorities must ensure there are sufficient good school places for all pupils, including those with SEN and disabilities. Through long-term strategic planning Council's are seeking to reconfigure specialist places to ensure that they can meet need whilst containing spending within the constraints of the High Needs budget.

The Special Educational Needs & Disability Provision Commissioning Strategy is part of a wider framework of policy documents that support the Council Plan 2018 to 2020 which sets out the 5 Council priorities.

- Securing inclusive economic growth
- Planning and delivery for Solihull's low carbon future
- Managing demand and expectation for public services
- Developing and delivering our approach to services for adults and children with complex needs
- Making the best use of our people and physical assets.

2. Current Demographic Data and Trends

Numbers of Pupils with Special Educational Needs in Schools in Solihull (Source Statistical First Release January 2017 SF37/2017)



At January 2017, 6,113 pupils (14.9%) had Special Educational Needs. Of these 1,213 (3%) had a statement or EHC Plan compared to 2.8% nationally and 3% for the West Midlands region. 4,900 pupils (11.9%) are on SEN support compared with 11.6% nationally. These numbers encompass all pupils with SEND on roll at schools located in Solihull including independent schools and pupils that live outside of Solihull that attend Solihull schools.

2.1 Statements of Special Educational Needs and Education Health & Care Plans for Solihull Resident Children (source SEN 2 return 2016, 2017 & 2018)

At January 2018, Solihull maintained a total of 1,444 statements and EHC Plans for Solihull resident pupils. This represents an overall increase of 29 (2%) since January 2017 and an increase of 209 (17%) EHCPs since Jan 2016.

The data shows increases across all phases; however the most significant growth in statements and plans is across the post-16 and further education sector, where the growth over the two year period has more than doubled.

In addition to the Solihull pupils with an EHCP, 219 pupils that live outside of Solihull but have an EHCP are being educated in Solihull maintained schools and academies.

2.2 Current Specialist SEND Provision located in Solihull

Specialist SEND Provision located in Solihull is comprised of 6 special schools, 1 of which is an Academy and 1 independent special school.

In addition there are 8 Additionally Resourced Provisions (ARP) located within mainstream schools. The ARPs are designed to provide specialist and targeted teaching and support for children with a particular area of need and is an integral part of the mainstream school.

Maintained Special School and Academy Information

| School | Need | Age Range | NOR Jan 2018 | Commissioned Places Sept 2017 | Commissioned Places Sept 2018 | Capacity based on workspace analysis |
|-----------------------|------|-----------|--------------|-------------------------------|-------------------------------|--------------------------------------|
| Forest Oak | MLD | 4 – 19 | 167 | 165 | 179 | 178 |
| Hazel Oak | MLD | 4 – 19 | 160 | 163 | 158 | 132 |
| Northern House | SEMH | 4 – 16 | 86 | 87 | 82 | 124 |
| Merstone | SLD | 2 – 19 | 103 | 102.2 | 102.2 | 74 |
| Reynalds Cross | SLD | 2 – 19 | 106 | 106 | 117.2 | 102* |
| Total | | | 622 | 623.2 | 638.4 | 610 |

*excludes the Green Lane Nursery accommodation

The number of commissioned places in our special schools is increasing year on year to try and meet the growing demand for specialist provision.

Over the last two years 24 part-time (equivalent to 14.4 full-time) early years places have been created at Merstone and Reynalds Cross Schools. However, it is clear from the capacity calculation that the increasing demand for places is now exceeding the accommodation capacity available.

It should be noted that 96 (15%) of the pupils on roll at the special schools in January 2018 live outside of Solihull (based on Jan 2018 pupil census). The costs of these placements are recouped from the relevant neighbouring Authorities. Every endeavour should be made to maximise the use of provision in Solihull for Solihull families.

Additionally Resourced Provision (ARP)

| School | Need | Age Range | Number on Roll Jan 2018 | Commissioned Places Sept 2017 | Commissioned Places Sept 2018 |
|-----------------------|--|-----------|-------------------------|-------------------------------|-------------------------------|
| Alderbrook* | Speech & Language/Moderate Learning Difficulties | 11 - 16 | 24 | 29 | 22 |
| Alderbrook | Autism | 11 - 16 | 11 | 11 | 18 |
| Dickens Heath Primary | Autism | 4 - 11 | 0 | 0 | 14 |
| Langley Secondary | Physical Difficulties | 11 - 16 | 21 | 22 | 22 |
| Langley Secondary | Specific Learning Difficulties | 11 - 16 | 30 | 27 | 27 |
| Bishop Wilson | Speech Language & Communication Needs | 4 - 11 | 4 | 6 | 6 |
| Valley Primary | Speech Language & Communication Needs | 4 - 11 | 15 | 16 | 16 |
| Windy Arbor Primary | Autism | 4 - 11 | 0 | 0 | 14 |
| Yew Tree | Social Emotional Mental Health | 4 - 11 | 4 | 8 | 8 |
| | | Total | 109 | 121 | 149 |

*reducing in size as Autism ARP expands

The Council is currently commissioning zero places at Lyndon Hearing Impaired ARP and Widney Junior Specific Learning Difficulties ARP as the pupils that would have been placed in these provisions are now having their needs met in mainstream schools. The Council is considering publishing statutory proposals to formally close these two provisions.

Between September 2017 and September 2018, 28 (23%) additional places have been commissioned in ARPs. This is due to the opening of Autism provision at Alderbrook, Dickens Heath and Windy Arbor Schools and the new SEMH provision at Yew Tree Primary School.

2.3 SEND Placements (source SEN2 Jan 2017 & 2018)

The SEN2 return also requires the Council to provide statistics on which provisions pupils are placed in.

Of the 1,415 EHC Plans and Statements that the Local Authority maintained in January 2017, 39% were placed in maintained special schools or special academies. This is higher than the national figure of 36%. The January 2018 data shows that this figure has increased to 40%.

The data from 2016 to 2018 shows a 21% drop in the number of pupils with statements and EHC Plans being educated in mainstream schools and academies, and a corresponding increase in the number of pupils placed in specialist provision, in particular in independent special schools and additionally resourced provision.

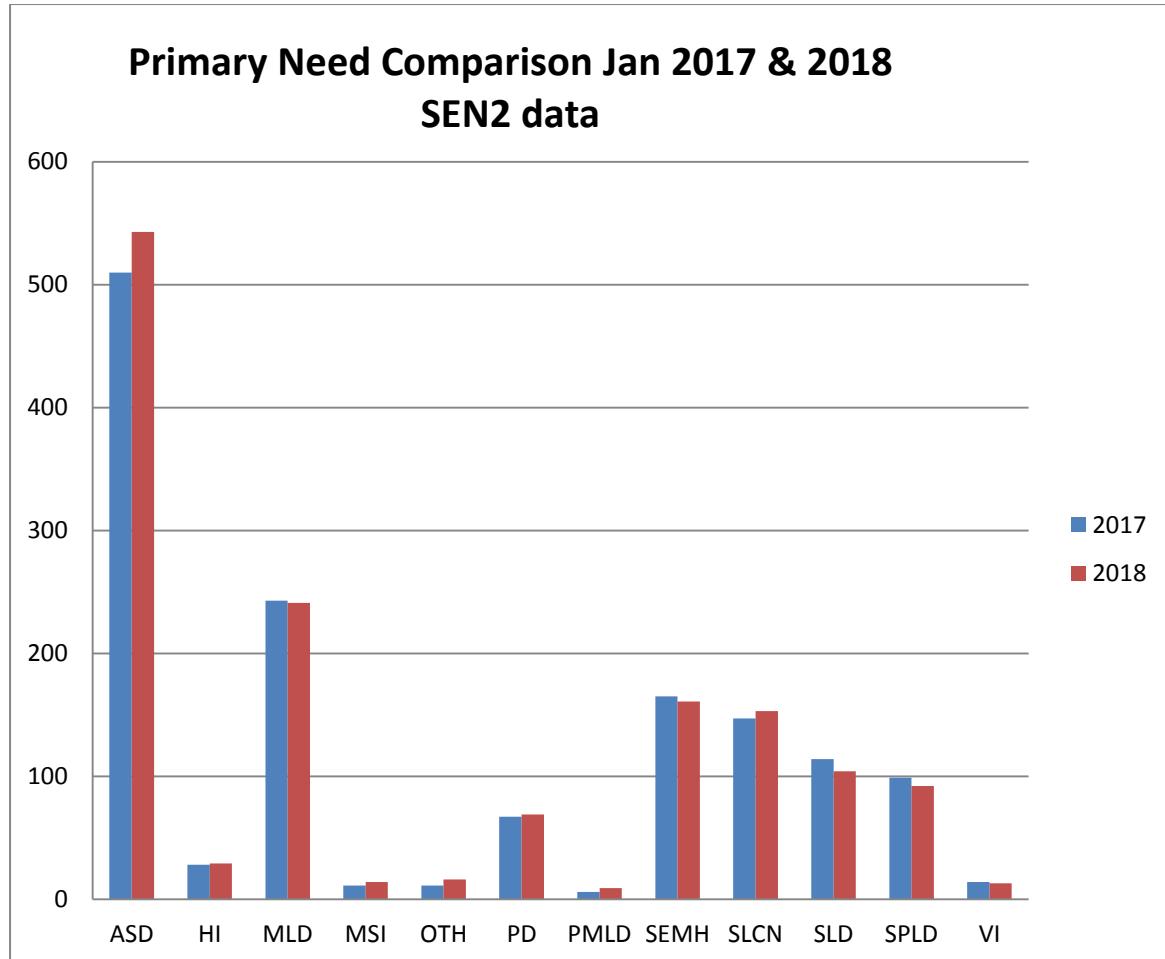
Despite a growing number of commissioned places in maintained special schools and special academies in Solihull, 124 pupils (8.5%) with a Statement/EHCP were placed outside of Solihull in the independent sector at January 2018. Placements in the independent sector do cater for pupils with very complex needs however they are normally high cost and also incur the cost of transporting the pupil outside of Solihull.

In 2017, 23 pupils with statements and EHCPs (2%) were placed in pupil referral units which are intended as short stay placements rather than a long term destination placement. This has reduced to 15 at Jan 2018 but remains too high.

At Post-16, 129 students (9%) with a Statement/EHCP were in General FE/Sixth Form provision in 2017 whilst 60 (4%) were placed in specialist high cost post-16 provision. The number of post-16 students has increased in 2018, however the number of those young people in high cost provision has reduced to 47 (3.5%).

2.4 Primary Need (based on Jan 2017 & 2018 SEN2 data)

The SEN2 return does not require Councils to report on data regarding primary need, however for analysis of the needs of Solihull pupils it is the most reliable source of data as it includes all Solihull pupils regardless of where they are placed. The January pupil census does not include Solihull pupils placed in provision outside of Solihull.



The data shows that Autism is the highest primary need and that between January 2017 and 2018 the number of pupils with Autism has increased by just over 6%. Moderate Learning Difficulty (MLD), Social Emotional and Mental Health (SEMH) and Speech, Language and Communication Needs (SLCN) are the next highest primary needs, although SLCN is the only one showing growth between 2017 and 2018. Hearing Impairment (HI) and Physical Difficulty (PD) are also showing small levels of growth.

At January 2017, 54 pupils with ASD as their primary need were placed in independent provision; this has increased to 64 at January 2018. This equates to just over 50% of all of the independent school placements.

2.5 School Travel Assistance for pupils with an EHCP

Travel assistance is provided to 547 pupils at an annual cost of £2.9 million. Around 30% of Solihull pupils with an EHCP that are educated in Solihull provision require transport in specialist taxis or mini buses, this increases to over 70% of solihull pupils travelling to provision outside of Solihull. Our reliance on out of borough placements is putting an unaffordable strain on the annual transport budget.

Education Travel Assistance at May 2018

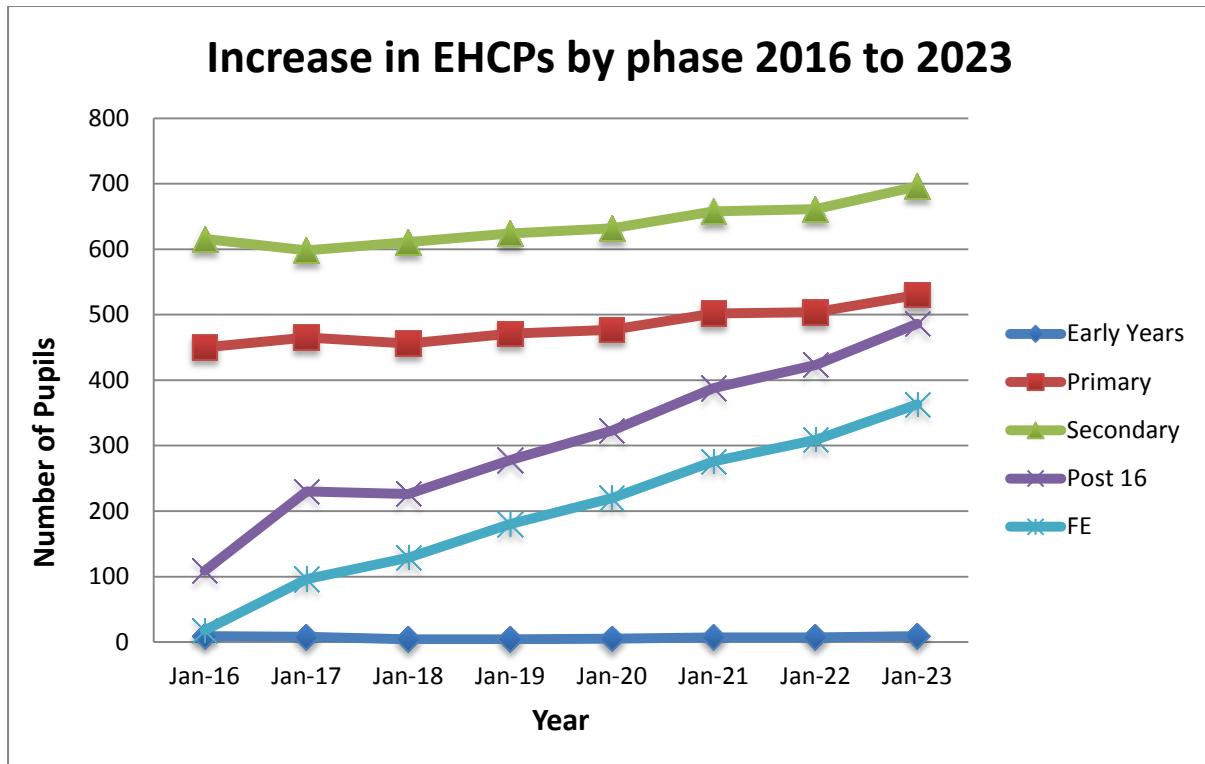
| Type of Travel Assistance | No of Pupils | Total Cost this month (Annualised) | Ave cost per Pupil | In Borough | | | Out Borough | | |
|---|--------------|------------------------------------|--------------------|--------------|------------------|--------------------|--------------|------------------|--------------------|
| | | | | No of Pupils | Total Cost | Ave cost per pupil | No of Pupils | Total Cost | Ave cost per pupil |
| Bus Pass | 29 | 21,021 | 725 | 27 | 18,841 | 698 | 2 | 2,614 | 1,307 |
| Direct Payment - Mileage | 77 | 178,946 | 2,324 | 55 | 89,042 | 1,619 | 22 | 89,905 | 4,087 |
| Direct Payment - Bus Pass | 1 | 294 | 294 | 0 | 0 | | 1 | 294 | 294 |
| Minibus | 440 | 2,690,613 | 6,115 | 292 | 1,238,253 | 4,241 | 148 | 1,452,360 | 9,813 |
| Total Children in Receipt of Travel Assistance | 547 | 2,890,874 | 5,285 | 374 | 1,346,136 | 3,599 | 173 | 1,545,172 | 8,932 |

3. Future pupil forecasts for Solihull pupils with an EHCP

In advance of developing this commissioning strategy and in response to increasing pressures and costs in securing provision for children and young people with EHCPs, a complete review of data for SEND pupils has been undertaken. The output from this review has supported the development of a SEND forecasting model. The emerging model is based on historical data, from September 2013 to 2018, and uses a weighted average to project pupil numbers forward to January 2023. This data will be used as a baseline and be moderated against actual data year on year to consolidate and improve forecasting accuracy.

3.1 Forecast numbers of EHCPs

Analysis of current data trends and future demographic forecasts show that between January 2018 and January 2023 the number of EHC Plans for Solihull pupils are forecast to grow by 656.



Post-16 and Further Education are showing the largest increase in EHCPs across all phases with a forecast growth of 494. The data for this area needs further analysis to explore the increase in pupil forecasts against the level of statements and EHCPs that are being discontinued at key milestones. The growth across all other phases is 162 EHC Plans over the 5 year period.

No increase is shown in the forecasts for Early Years. This is due to the fact that, on the whole, children are too young to have an EHCP in place during the Early Years phase. For indications of trends at the Early Years stage, data around SEN support will need to be considered. The SEND support forecast data is showing a 78% increase in demand over the same 5 year period.

The development of Early Years provisions attached to Merstone and Reynalds Cross Special Schools reflects an increasing demand for Reception and KS1 places at the two Severe Learning Difficulty (SLD) special schools in the Borough, in particular to meet the needs of those pupils with Multi Sensory Impairment (MSI) and Autism. For September 2018, the number of Reception places has been increased at Reynalds Cross School and a subsequent expansion of places will be required at Merstone School from September 2019. Both of these expansions require capital investment.

3.2 Forecast demand for provision

Based on current trends and using forecast data for September 2023 we can model the anticipated increase in demand for educational provision for Solihull pupils with

EHCPs. The table below shows the expected growth in demand for each provision type, assuming current trends continue

| Type of Provision | Jan 2018 (based on actual) | Forecast at Jan 2023 | Forecast Increase in number of EHCPs by 2023 |
|---|----------------------------------|-------------------------|--|
| Solihull maintained and Academy Special schools | 507 | 607 | 100 |
| Solihull Additionally resourced provision | 75 | 78 | 3 |
| Pupil Referral Units | 6 | 8 | 2 |
| Mainstream Schools | 356 | 312 | -44 |
| LA Further Education provision | 135 | 395 | 260 |
| Other LA Special Schools | 68 | 100 | 32 |
| Other LA ARPs | 3 | 7 | 4 |
| Other LA Mainstream | 25 | 33 | 8 |
| Other LA FE Mainstream | 60 | 172 | 112 |
| Other LA FE Special | 28 | 75 | 47 |
| Independent Special Schools | 79 | 122 | 43 |
| Independent Mainstream Schools | 21 | 19 | -2 |
| Other Independent Schools | 27 | 45 | 18 |
| Elective Home Education | 22 | 69 | 47 |
| Other | 13 | 39 | 26 |
| Total | 1,425 | 2,081 | 656 |

The forecasts show that if current trends continue there will be a further 12% decrease in the number of pupils with EHCPs in a state mainstream school setting and a significant increase in demand for specialist provision. Potentially 100 additional pupils will require special school places in Solihull.

A total of 59 additional pupils will require independent provision. The average cost (at April 2018) of an independent school place is £42,500 per place so this would be at an additional cost of circa £2,500,000 in independent school placements, plus the

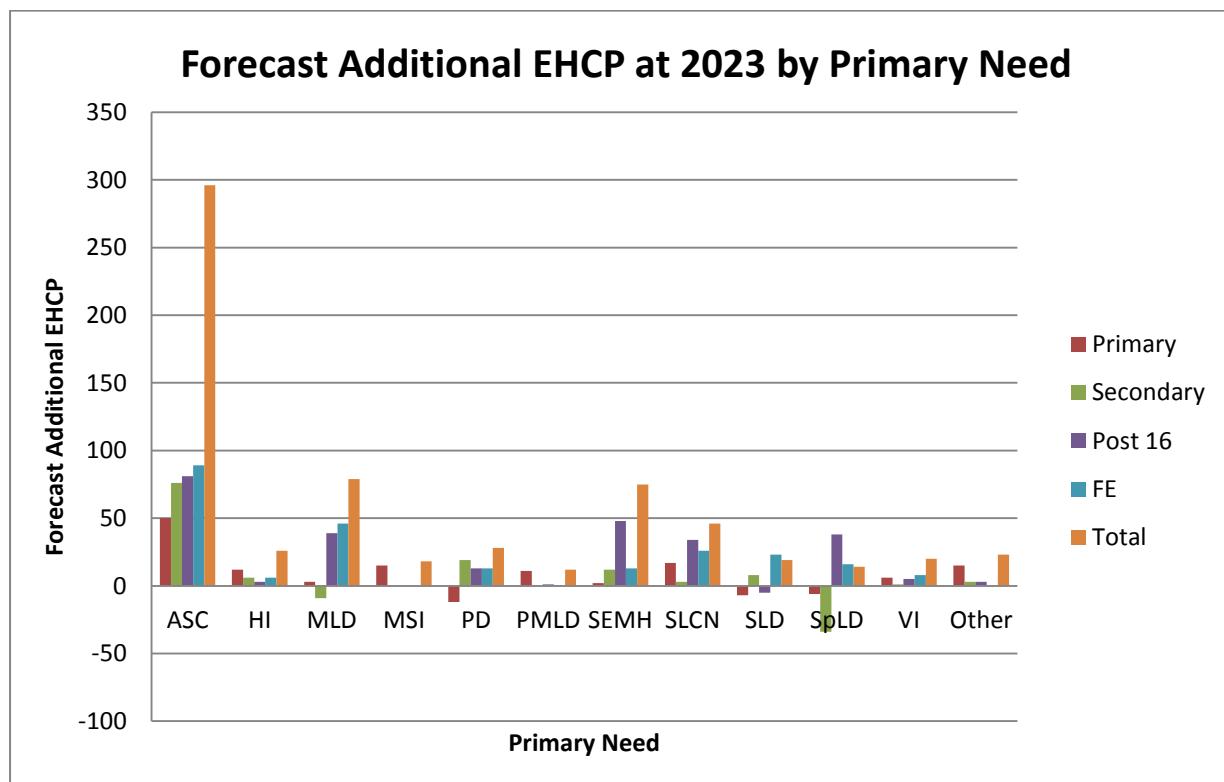
additional transport costs of up to £600,000. Neither the High Needs revenue budget nor the transport budget can support an increase in demand for specialist placements at this level. It is essential that strategies are developed to increase the number of pupils with EHC Plans that are able to have their needs met within Solihull, with a focus on maintaining pupils in a mainstream school setting.

The forecasts also show a significant increase in parents choosing to electively home educate their child. Further work is required to identify whether this trend is due to parental preference or parent's views on the extent of specialist provision in the borough.

These forecasts are for Solihull pupils only and do not make an allowance for pupils living outside of Solihull attending Solihull Schools and provision. At January 2018, 219 pupils with an EHCP that live outside of Solihull, were being educated in Solihull maintained schools and academies.

3.3 Forecast SEND places by primary need

The chart below shows the forecast increase in demand for Solihull pupils by phase and by primary need by January 2023.

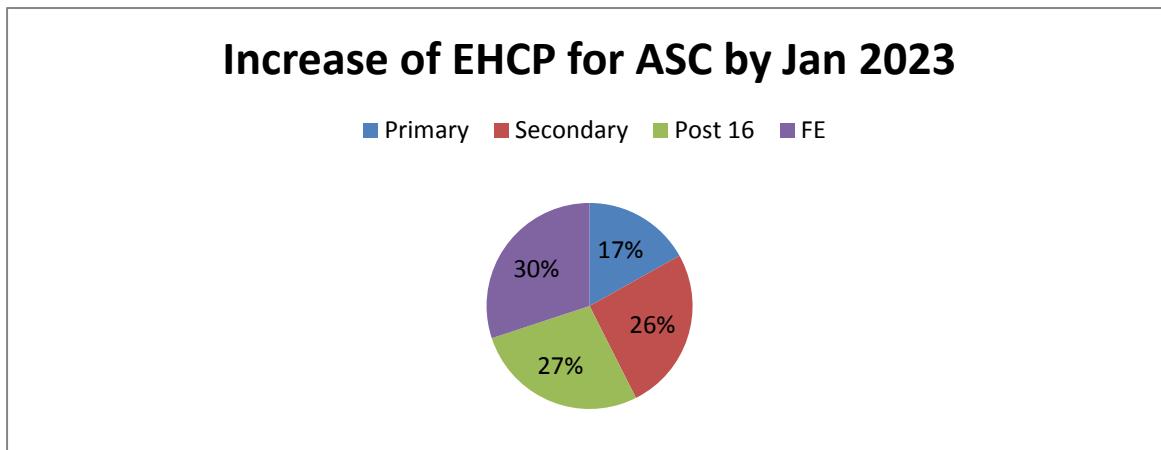


The forecasts show that the largest growth in demand will be in the areas of ASC, MLD and SEMH. For ASC the data is showing marked growth across all phases, whereas for MLD the growth is focused purely around post-16 and FE. For SEMH the growth is largely focused around Post-16 but to a lesser extent the secondary and FE phases.

When considering the development of new specialist provision these areas should be considered as the priority for investment.

3.4 ASC Provision

The forecasts indicate that there will be an additional 296 EHCPs where ASC is the primary need by January 2023. The chart below shows how this increase will be split by phase.



For **primary age** pupils the data is showing an overall increase of 50 EHCPs (17%) by 2023, but this data is masking a significant shift in demand from mainstream primary schools to specialist provision, meaning the growth in demand for specialist provision will be nearer 90 EHCPs. 28 primary ARP places have been created during 2018, which will go some way towards meeting this increase in demand, however, it is essential that a strategy to maintain more pupils within a mainstream primary school setting alongside the development of further primary ASC specialist places in the borough will be required, if we are to cease our reliance on high cost Out of Borough provision.

At **secondary age** there is a forecast increase of 76 EHCPs (26%) for pupils with ASC, with the demand increasing for specialist provision both at maintained special schools and independent provision. The data shows the numbers of pupils in mainstream secondary provision will be maintained but does not show any growth. A 30 place Autism ARP has been created at Alderbrook School, but as with the primary phase, a strategy that further develops mainstream inclusion alongside further investment in secondary ASC places will be required in order to offer a local alternative to high cost independent provision, not just for the forecast growth but to cater for the numbers of pupils already in high cost independent provision.

Post 16 and Further Education phases are showing the largest increase in demand, at 57%, with the largest growth expected to be catered for within mainstream FE establishments. Further work is required on post 16 placements and data to ensure that robust forecasts are in place. However, any increase in provision for pupils with ASC at secondary age will need to address places at Post-16 as well

to ensure that there is a clear transition process in place for students and not an increasing reliance on specialist post 16 provision outside of the Borough.

3.5 SEMH Provision

The SEMH data is showing an increase of 75 EHCPs by January 2023.

The largest increase in demand is for post-16 pupils where the data shows a potential increase of 48 EHCPs. Although the majority of the increase in demand will be catered for in mainstream settings (both school and FE settings) the demand for special school places is also forecast to rise.

In addition to the growth in demand for EHC Plans the data is also showing a 41% rise in the number of pupils identified as requiring SEND support. An 8 place primary SEMH assessment ARP opened at Yew Tree Primary School in September 2017, which meets the needs of pupils prior to them requiring an EHC Plan. Further growth in SEND support provision of this nature will be required to meet this growing demand and support mainstream schools to meet the need of these pupils.

3.6 MLD Provision

Forecasts indicate that the growth in MLD demand will be completely in Post-16 and Further Education phases. No additional growth is forecast in the primary phase and a reduction is forecast at Secondary.

In September 2018 the Council and Forest Oak School are running a pilot in partnership with Solihull College, to relocate the school post-16 provision to Solihull College. This partnership arrangement will provide students with the benefits of a special school ethos with access to the additional facilities available at the College. If successful this pilot will support the transition of pupils at this key milestone whilst freeing up accommodation in special schools for younger pupils.

Both Forest Oak School and Hazel Oak School are designated as MLD special schools, and the forecast decrease in demand for MLD does not appear to reflect the increasing demand for Special School places. At January 2018 pupil census, analysis of the needs of pupils on roll at these two schools shows a shift in the needs of the children they are educating.

| Primary Need | Forest Oak | Hazel Oak |
|--------------|------------|------------|
| ASC | 48 (29%) | 72 (45%) |
| HI | 0 | 2 |
| MLD | 85 (51%) | 38 (24%) |
| OTH | 1 | 4 |
| PD | 2 | 6 |
| PMLD | 0 | 1 |
| SEMH | 5 | 4 |
| SLCN | 24 (14%) | 26 (16%) |
| SLD | 0 | 2 |
| SpLD | 2 | 5 |
| Total | 167 | 160 |

It is clear from the data that the two MLD special schools are meeting the needs of a far wider range of pupils than their current designation suggests. In the case of Hazel Oak Autism is now the largest primary need that the school is meeting.

4. Revenue and Capital Funding

Solihull Council's High Needs Block for 2018/19 financial year is £26.6 million and is fully committed. The underlying trends of rising spending due to a combination of more pupils, pupils with greater needs and the placement of significant numbers of pupils in independent provision is a cause of significant concern. The High Needs Block is currently forecast to overspend by £1.5m at 2018-19 year end.

Forecasts show a potential increase of up to 656 (46%) EHC Plans by 2023, with 193 (29%) requiring special school or high cost independent school places. This situation is unaffordable within existing and forecast resources.

Whilst the High Needs Budget is forecast to increase each year due to population demographic changes, it will not increase to the extent that high needs cost places are forecast to grow.

A forecast overspend in the High Needs Budget should not prevent the Council from investing in new provision or specialist places. For every child placed outside of Solihull in independent provision, at least two pupils can be educated in a provision in Solihull. Using a spend to save model; the Council could endeavour to fund the revenue required for the creation of new provision through the reduction of placements outside of the Borough.

The Government has provided a grant to Local Authorities to support the expansion of specialist provision. For Solihull the grant equates to £1m over a 3 year period. The Council is required to publish annually a DfE template outlining how the £1M is to be invested in new specialist provision.

5. Development of Specialist Provision

The forecast data has highlighted some key priorities for investment to meet the demographic growth within the Borough as well as reduce our reliance on high cost independent provision. Any future investment in specialist provision should seek to secure a correlating reduction elsewhere in the High Needs budget.

The data suggests that the priorities for development are:-

- Develop a bid to establish a Special Free School with a focus around Autism
- Create Autism Enhanced provision in secondary schools across the Borough (aim to open 2 by September 2019).
- Consider the development of Post-16 Autism and SEMH provision
- Evaluate the Post-16 MLD pilot at Solihull College with a view to creating an equivalent provision in South Solihull.
- Expand Reception and KS1 SLD places at Reynalds Cross and Merstone Schools
- Develop SEMH additional resource provision in the primary phase (North Solihull as a priority).

6. Commissioning Strategy Principles

When considering the need to expand provision to accommodate an increasing number of children requiring additional support through an Education, Health and Care Plan (EHCP) the following principles should be at the core of the commissioning process.

- Children and young people with EHCPs should expect to have their needs met in their local mainstream provision.
- Where specialist provision is required this should be located in Solihull. Children should only be expected to travel outside of Solihull for specialist provision in exceptional circumstances.
- New specialist SEND provision should be created in partnership with parents, schools and other providers.
- Where new specialist provision is created within existing schools and academies they will be Ofsted rated good or outstanding.
- Opportunities will be explored to allow creative use of enhanced mainstream provision enabling more pupils to receive their education in a mainstream setting, potentially with the support of Special Schools and the Solihull School Inclusion Service.
- Work with schools to create enhanced provisions within existing school buildings limiting the need for capital expenditure.
- Children with Education & Health Care Plans should not be placed in short term provision.

- The level of commissioned places at existing maintained special schools in Solihull will remain at current levels unless investment in additional accommodation is achieved.
- Seek to reduce the current level of places within other Local Authority special schools and additionally resourced provision and place future pupils in Borough.
- Reduce Solihull's reliance on expensive independent provision and investment in the creation of new provision within Solihull.
- All new schools to be developed to include an Additionally Resourced Provision.

In order to create the new additional places required there will need to be a focus on reducing the cost of out of borough placements, through the review of existing pupil placements and, where appropriate, the placement of those pupils in newly created provision in borough.

With current demographic growth it is essential that the trend of reducing numbers of pupils with EHCPs in mainstream schools is reversed. Initiatives that recognise and reward inclusive mainstream schools must be developed to run alongside a system of challenge that holds to account any school or academy not meeting an agreed level of SEND provision. Parent's confidence in the ability of mainstream schools to meet their child's needs must be developed.

7. Conclusion

The data shows that the numbers of pupils requiring EHCPs will increase by 656 by 2023. This reflects a net increase in demand and masks the larger trend for an increase in specialist placements, rather than mainstream school placements. 100 additional solihull special school places will be required by January 2023.

The demand for independent school placements will continue to increase and is forecast to cost an additional £2.5 Million by January 2023. The Council's High Needs Budget cannot meet the increased cost in out of borough placements, or the cost of the transport.

The Council's total grant for providing additional accommodation for specialist provision is £1m spread over a 3 year period. This figure will not be sufficient to meet the forecast increase in demand for places, so the Council, in partnership with schools, will need to seek ways to create new specialist placements within existing school buildings.

The largest growth areas are for pupils with Autism, Social Emotional Mental Health and Moderate Learning Difficulties.

The emerging forecasting model used to identify demand for 2023 is based on historical data for the period 2013 to 2018. This data has been used as a baseline

and will need to be moderated, annually, against actual data which will consolidate and improve forecasting accuracy.

The creation of new specialist provision will need to be part of a wider programme of activity that looks to support and increase mainstream inclusion.

| Action Plan | Timescale |
|---|--|
| Consult schools, parent/carers and the wider SEND community on the draft commissioning strategy | Autumn Term 2018 |
| Carry out further work on trend and forecast data to validate future forecasts, in particular around Post 16 and Early Years. | Autumn 2018/Spring 2019 |
| Engage further with the Solihull parent/carer forum to be clear on their view of gaps in specialist provision in Solihull. | Autumn Term 2018 and On going |
| Work with Secondary Schools, using time tabling and data and analysis to identify accommodation that could be used to create enhanced specialist provision, in particular around Autism and Social Emotional Mental Health Needs. | Aim to open two enhance provisions by September 2019 |
| Evaluate the new primary Autism Additionally Resourced Provision and look to create a wider geographical spread of provision. | 2018/19 academic year |
| Develop a specification and bid for an Autism Free School | Bid due 15 October 2018 |
| Develop options to meet the growing demand for SEND support for SEMH in the primary phase | Academic Year 18/19 |
| Develop capacity to identify pupils in out of borough provision that could benefit from a place in a newly created provision in Solihull and to work with families with a view to relocating appropriate pupils. | On going |
| Develop a strategy around Post 16 and FE placements and provision | On going |