



Blackburn with Darwen's Approach to using Alternative Provision by mainstream schools

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Which of the council's core missions does this guidance align to?	☐ A more prosperous borough where no one is left behind ☒ Every child and young person to have opportunities to fulfil their potential ☐ Deliver our climate emergency action plan ☐ Build happier, healthier and safer communities
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Which of the department's priorities does this guidance align to?	☐ Stable homes built on love ☒ Right support, right time, right person ☒ Effective transitions for all ages and needs ☒ Raising aspirations and fulfil potential ☐ We are Systemic ☐ Best start in life
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Contents

Contents	2
1. Introduction	3
2. What is Alternative Provision	3
3. Use of Alternative Provision	3
4. What is Good Alternative Provision?	4
5. DFE Registration Requirements	4
6. Directing Pupils Off Site for Education	5
7. St Thomas's Centre Alternative Provision	5
8. Responsibilities for Commissioning AP - Pre commissioning	6
9. Commissioning Responsibilities - Once commissioned	7
10. Attendance Coding & Suspensions	8
11. Placement reviews, Visits & Transition	9
12. Inspecting Offsite Provision - What do Ofsted Inspectors look for?	10

1. Introduction

Blackburn with Darwen believe that every pupil should primarily be educated within mainstream settings. It is expected that schools will utilise all available resources to empower pupils to reach their potential and achieve best outcomes within a full time, mainstream place.

However, it is recognised that some pupils may need additional support to overcome barriers to learning and alternative provision could be one option to be considered where they are experiencing difficulties accessing the mainstream curriculum offer.

This may include issues relating to a child or young's social, emotional, mental health or behaviour difficulties. Schools should recognise any issues or barriers, and hence a potential requirement for alternative provision, as early as possible.

Alternative provision can support early intervention in mainstream schools to improve school capacity and capability to respond to rising issues over behaviour, attendance, mental health or other needs. Interventions can reduce the likelihood of children becoming persistently or severely absent, reducing preventable exclusion and the need for longer term placement into alternative provision.

Where early intervention is offered, it should be as part of a continuum of support, with clear processes for referral and to escalate or de-escalate support as required.

2. What is Alternative Provision

For the purpose of this guidance, the DfE define Alternative Provision as follows (February 2025) ([Arranging Alternative Provision - guide for LAs and schools](#)):

- education arranged by local authorities for children of compulsory school age who, because of exclusion, illness or other reasons, would not otherwise receive suitable education;
- alternative provision can also be used by schools for children on a suspension (fixed period exclusion);
- and for children being directed by schools to off-site provision to receive education intended to improve their behaviour

AP providers can offer high quality off-site tutoring or therapeutic intervention services to meet children and young people's varied and complex needs. By using alternative provision, programmes of learning can be designed to meet the needs and interests of the individual pupil. This makes it more likely that they will engage with learning and succeed in education.

3. The Use of Alternative Provision

Schools can use such provision to provide targeted support where a pupil is at risk of exclusion, or to re-engage pupils in their education.

Alternative provision should be good quality, registered where appropriate, and delivered by high quality staff with suitable training, experience and safeguarding checks. It should have

clearly defined objectives relating to personal and academic attainment. Where an intervention is part-time or temporary, to help minimise disruption to a pupil's education, it should complement and fulfil a broad and balanced curriculum.

If a pupil is referred to off-site provision on a part-time basis, they should attend school as usual on the days on which they are not in the alternative provision.

4. What is Good Alternative Provision?

Good alternative provision is that which appropriately meets the needs of pupils and enables them to access learning. Provision will differ from pupil to pupil, but there are some common elements that alternative provision should aim to achieve, including:

- Maintaining academic progress – particularly in English, Maths and Science
- That the specific personal, social and academic needs of pupils are properly identified and met in order to help them overcome any barriers to attainment
- Improved pupil motivation and self-confidence, attendance and engagement with education
- Clearly defined objectives, including the next steps following the placement such as reintegration into mainstream education, further education, training or employment

5. DfE Registration Requirement

Alternative Provision can either be registered with the DfE or unregistered. Alternative providers must register with the DfE if they provide full time education for:

- Five or more pupils of compulsory school age
- One or more pupils of compulsory school age with an education, health and care plan or
- One or more pupils of compulsory school age who are looked after

If a provider does not meet any of these criteria – for example, by only providing part-time education – there is no need to register.

Schools can arrange alternative provision in settings which are not schools or colleges. This is commonly known as unregistered alternative provision because, unlike schools or colleges, this type of provision is not subject to a national registration scheme or inspection framework. As with other types of alternative provision, commissioners are responsible for the safety and quality of the provision they use and that the placement is appropriate for the child's needs. Commissioners should have regard to this guidance when arranging unregistered alternative provision.

Commissioners should ensure that they do not place children with an unregistered provider if that would mean that the setting would need to be registered as an independent school. If you

suspect a provider is potentially operating as an unregistered independent school, please contact the Head of Service for Schools Systems on carol.grimshaw@blackburn.sch.uk

6. Directing Pupils Off-Site for Education

Where interventions or targeted support have not been successful in improving a child's behaviour at their home school, off-site direction can be used to arrange time limited placements at an alternative provision or another mainstream school. During the off-site direction to another school, children must be dual registered.

Off-site direction into alternative provision can be full-time or a combination of part-time support in alternative provision and continued mainstream education.

When arranging off-site direction into alternative provision, the governing body must have regard to this guidance and comply with the Education (Educational Provision for Improving Behaviour) Regulations 2010.

Under revised off-site regulations the governing body must:

- Ensure that parents (and the local authority where the pupil has an EHC plan or is Looked after) are given clear information about the placement: why, when, where, and how it will be reviewed.
- Keep the placement under review and involve parents in the review. The regulations specify regular reviews but do not specify how often reviews must take place (that should be decided on a case-by-case basis). Reviews should be frequent enough to provide assurance that the off-site education is achieving its objectives and that the pupil is benefiting from it.
- Parents and, where the child has an EHC plan, the local authority can request, in writing, that the governing body hold a review meeting. When this happens, governing bodies must comply with the request as soon as reasonably practicable, unless there has already been a review meeting in the previous 10 weeks.

This legislation does not apply to academies. They can arrange off-site provision for similar purposes under their general powers, set out in the Academy Trust's Articles of Association. Though the regulations and guidance do not apply, they can provide academies with an example of good practice.

7. St Thomas's Centre Alternative Provision

Blackburn has one maintained Alternative Provision (Pupil Referral Unit) providing for pupils aged 5-16. As a Local Authority, we undertake ongoing, regular quality assurance. Quality assurance takes the form of:

- A full annual review against a North West AP Quality Assurance toolkit
- Termly SEND School Effectiveness QA Visits,
- Admissions and Attendance monitoring
- SEND monitoring

- Data analysis
- Competency audits for safeguarding, health & safety, etc.

As a registered school, St. Thomas' is also inspected by Ofsted against all the same evaluation areas as a mainstream school. For their most recent Ofsted report, please see the school's website.

Schools are able to commission provision from other providers (both registered and unregistered provisions) but should assure themselves of the quality and safety of this provision.

8. Responsibilities for Commissioning AP – Pre-commission

When commissioning an AP placement, the responsibility rests with the main school.

Commissioning schools should carefully consider what providers are available that can meet the needs of their pupils, including the quality and safety of the provision, costs and value for money.

The school commissioning the placement should maintain ongoing contact with the provider and pupil (both in person, by phone or written contact), with clear procedures in place to exchange information, monitor progress and provide pastoral support.

The school commissioning the placement should maintain a full record of all placements they make, including a pupil's progress, achievements and destination following the placement. This should also include the pupil's own assessment of their placement.

It is the commissioning school's responsibility to fund the provision and make arrangements for payments to providers.

If schools are considering commissioning a placement from a provider other than St Thomas's Centre; they should complete a commissioning checklist

Suggested Commissioning Checklist for commissioning schools

You may wish to use the Blackburn with Darwen Alternative Provision Quality Assurance Toolkit to help you with this process. This is an appendix to this document.

- Check the registration status of each provider and whether they should be registered.
- Check provider's policies and procedures including
 - Behaviour / attendance policy (including anti-bullying and positive intervention)
 - Curriculum plans, schemes of work and student assessment procedures
 - Arrangements to safeguard and promote the welfare of pupils including e-safety and social media use. Schools should be proactive in documenting the name of the DSLs and seek confirmation of recent safeguarding training including annual KCSiE updates.
 - Health and Safety Policy
 - Complaints procedure

- Qualifications and experience of staff (unregistered provisions only)
- Arrangements for first aid
- Fire risk assessment and procedures
- Recruitment and vetting checks for staff and management (unregistered provisions only)

9. Commissioning Responsibilities – Once Commissioned

Commissioning school's responsibilities

Once an AP placement has been agreed, **the Commissioning School maintains responsibility for:**

- Sharing all relevant information on referral – especially in relation to safeguarding, attainment, attendance, SEND and health needs and previous referrals to AP.
- ensuring parents/carers and pupil are aware of the reasons for referral and the arrangements for the initial meetings communicated with them.
- Keep the pupil on its admission register
- Support the provision with attendance monitoring and follow-up of on absences when attendance is a concern. Schools should be proactive in checking daily attendance and maintain contact with parents/carers where attendance is a concern. School may wish to consider holding earlier review of placement when attendance is a concern to identify barriers.
- Meeting the needs identified within a child's Education Health and Care Plan (where applicable).
- Transport arrangements where necessary.
- Where a pupil is eligible for free school meals, this will need communicating to the provider and suitable arrangements made.
- Pupil outcomes – schools' commissioning alternative provision must ensure it meets the child's educational and personal needs.
- Jointly agreeing the specific outcomes for the placement
- Make any necessary referrals to external services for SEND assessments or health needs and share with the providers that the pupil is at alternative provision.
- Ensuring the pupil remains a member of the school community, including their involvement with extra-curricular activities, social events, parents' evenings, letters to parents or child, and rewards.
- Ensuring the liaison between local health services and APs is in place to support information sharing and health care planning.
- Ensuring the medical needs of pupils are met in line with the DFE guidance and the 'Blackburn with Darwen meeting the medical needs of pupils in schools and settings framework'.
- Jointly completing any paperwork needed by other organisations and services e.g. PEP
- Jointly working together to provide careers guidance – schools to ensure pupils receive their full entitlement to careers information, advice and guidance.
- Referrals to relevant services to prevent young people becoming NEET.

Providers' responsibilities

- Record the pupil's actual attendance (using present, absence or suspension codes).
- Sharing of weekly attendance reports with the main school.

- Inform the commissioning school immediately of any attendance, safeguarding, behaviour and progress concerns and agreeing actions/next steps
- Meeting the needs identified within a child's Education Health and Care Plan (where applicable)
- Jointly agreeing the specific outcomes for the placement
- Jointly completing any paperwork needed by other organisations and services e.g. PEP
- Maintaining contact with parents on a daily basis once attending the provision
- Jointly working together to provide careers guidance – schools to ensure pupils receive their full entitlement to careers information, advice and guidance.
- If a pupil has breached a Provider's code of conduct or poses a health and safety risk to others, the Provider may use their internal procedures to suspend the Pupil from attendance at their provision. Providers should always inform the pupil's main school of the sanction. The provider should notify the school if the placement cannot continue detailing the reasons for this.

10. Attendance Coding & Suspensions

When a pupil is dual-registered, it is essential that the commissioning school and provider code the attendance correctly and consistently.

Attendance Coding

Commissioning (Main) school

The main school must use:

- **Code D:** Dual registered at another school.

Code D must be used for every session timetabled at the AP. This code cannot be replaced with E or any other code.

Provider (AP) Coding

The AP must record:

- **I or ll** for present
- **I, C, O** etc. for absence
- **E** if the AP issues a suspension

Why the Main School Must **Not** Record the E Code

DfE rules explicitly state:

"Where a pupil is dual registered, suspension sessions are not recorded for the days they are attending the other organisation."

Therefore:

- The E code **must not** appear on the main school's register.
- The main school must leave the **D code** unchanged.
- The suspension applies *only to the AP sessions*, not the main school sessions (which the child was not scheduled to attend)

Suspension Procedures for Dual-Registered Pupils

According to DfE statutory guidance:

- Only the **headteacher of the setting where the behaviour occurred** can suspend a pupil.

If the incident happens at the AP:

- AP headteacher must issue the suspension.
- AP must notify parents, main school, LA and governing board.

Recording the Suspension

- **AP** records E code for the suspended sessions
- **Main school** keeps D code.

Summary table for dual-registered pupils

Area	Main School	AP
Registration	Primary roll	Subsidiary roll
Attendance Codes	D for AP sessions	Actual marks including E
Who issues suspension?	X	✓ (if incident at AP)
Who records E code?	X	✓
Who maintains safeguarding contact with family?	✓	✓
Who reports to LA for the suspension?	X	✓

11. Placements reviews, Visits & Transition**Placement Reviews**

It is important that pupils' placements are frequently reviewed so that they have a better understanding of how well pupils are doing and whether or not the placement continues to meet pupils' evolving needs. Alternative provisions, by definition, should be a short term intervention.

Commissioning schools' responsibilities:

- Pastoral visits to the pupil half termly (or more frequently where possible)
- Attendance at placement admission and review meetings. The person attending must have permission to sign the service level agreement and be able to make, and undertake, decisions about next steps
- Ensure any referrals needed (external services) are made in a timely manner

Commissioning school's staff visits to pupils

Pastoral visits – the AP will provide a space for the member of staff to meet with the pupil during the school day. This would be an informal visit and not include working with the pupil in the classroom.

Supporting pupils – there is an expectation that the member of mainstream school staff will follow the AP's professional code of conduct and abide by their policies and procedures whilst onsite.

The AP will provide any mainstream school staff working with the pupil within the AP with the same level of induction information provided to supply staff.

Transition

Placements into alternative provision should always be made with the child's reintegration back into mainstream education or move onto a sustained post-16 destination in mind.

Commissioning schools' responsibilities

- Jointly agree a date for transition
- Welcome the pupil back into the school community as a 'fresh start'
- Ensure the relevant strategies and support are in place for the pupil's return to mainstream school

Commissioners' responsibility

- Jointly agree a date for transition
- Communicate relevant strategies with the mainstream school about supporting the pupil's transition e.g. through meetings, reports, visits

12. Inspecting Offsite Provision – What do Ofsted Inspectors look for?

Ofsted inspects how mainstream schools **select, monitor, quality-assure, and evaluate** any alternative provision they use. Inspectors look at **why pupils are placed in AP**, whether placements are **appropriate and safe**, and how well the school ensures pupils receive a **high-quality, coherent curriculum**. This scrutiny is now stronger under the new inspection framework, where AP use is examined across **every judgement area**.

Before visiting, Ofsted asks the school **whether any pupils attend off-site AP**.

Inspectors request:

- A list of all pupils in AP
- Reasons for placement
- Duration and type of provision
- Evidence of monitoring arrangements

This is part of the **initial inspection planning call**.

During the Inspection, inspectors will check the following:

Rationale for Using AP

Inspectors check:

- Whether AP is used **appropriately**, not as a behaviour-management shortcut.
- Whether the school has explored **in-school support** before placing a pupil externally.
- Whether placements align with pupils' **needs, SEND profiles, and long-term plans**.

Curriculum Quality & Coherence

Even though AP settings differ from mainstream schools, inspectors expect:

- A curriculum that is **ambitious, sequenced, and matched to pupils' needs**.
- Evidence that the mainstream school ensures the AP curriculum contributes to **progress**, not just supervision.

Safeguarding & Welfare

Inspectors examine:

- Safeguarding checks on AP providers
- Attendance monitoring
- Communication between school and provider
- How the school ensures pupils are **safe, attending, and engaged**

Monitoring & Quality Assurance

Schools must show:

- Regular visits to AP
- Written reports on progress, behaviour, attendance
- Clear accountability structures
- Evidence that the school evaluates **impact** and **value** of AP placements

Inclusion & Leadership

Under the new framework, inclusion runs through all judgement areas. Inspectors look at:

- How leaders ensure AP pupils are **not forgotten**
- Reintegration plans
- How AP use reflects the school's **ethos and leadership capacity**
- How governors understand and scrutinise AP use