



Attendance and Section 19 of the Education Act (1996) Gloucestershire County Council's Policy and Process

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Organisation	Gloucestershire County Council
Title	Attendance and Section 19 of the Education Act (1996), Gloucestershire County Council's Policy and Process
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Owner	Gloucestershire County Council's Education Leadership Team
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Version	Key Amendments	Date Published	Actioned by
1.0	Policy Published	17/02/24	J. Saunders
1.1	Section 4 – S19 Assessment	01/04/24	J. Saunders
2.0	Section 3 – Process Flow	06/09/24	J. Saunders
2.1	Section 1 – incl. Attendance Regulations	24/01/25	J. Saunders
2.2	Section 2.24 - Otherwise, Scenario 4	03/09/25	J. Saunders
3.0	Section 1.4 - Children in Care	03/07/26	J. Saunders
4.0	Section 2 – Safeguarding Separation	23/09/26	J. Saunders

1. Introduction & Legal Context

- 1.1. [Section 19 \(S19\) of the Education Act 1996](#) places a duty on Local Authorities (LA) to *‘Make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive a suitable education unless such arrangements are made for them.’*

‘Local authorities are responsible for arranging suitable full-time education for permanently excluded pupils, and for other pupils who – because of illness or other reasons – would not receive suitable education without such provision. This applies to all children of compulsory school age who are residents in the local authority area, whether they are on the roll of a school, and whatever type of school they attend.’*

**Defined in [2023 Statutory Guidance as](#) ‘where possible, equivalent to the education they would receive in a mainstream school.’*

- 1.2. Of course, not every child requires the provision of education under Section 19 of the Education Act., simply because they are not accessing the provision being made available by their home school. This policy and process sets out Gloucestershire’s approach to assessing the need for, and then meeting the needs of Children for whom it has a legal responsibility to provide an education, but who for reasons relating to illness, exclusion or otherwise experience barriers to accessing a full and suitable education offer, despite Gloucestershire’s Graduated Pathway/ a Graduated Response having been mobilised and reasonable adjustments required under the [Equality Act 2010](#) being exhausted.
- 1.3. The Department for Education’s (DfE) [Alternative Provision Statutory guidance](#) for local authorities’ states *‘The term ‘suitable education’ is defined as efficient education suitable to the child’s age, ability, and aptitude, and to any special educational needs he or she may have. The education to be arranged by the LA should be on a full-time basis, unless, in the interests of the child, part time education is considered to be more suitable. This would be for reasons relating to the child’s physical or mental health.’* Education Act 1996 paraphrased by the Local Government Ombudsman.
- 1.4. It is important to recognise that Gloucestershire County Council’s responsibilities in relation to their Section 19 offer differ slightly for those with an Education Health and Care Plan (EHCP) and for those without an EHCP, as well as for those who are in the care of a local authority. These differing responsibilities are detailed below:

Child without an Education Health and Care Plan:

- The LA where a child resides is responsible for S19.
- If the child resides between different addresses in a split family, the decision is made on where the child spends most of their time and this LA has the S19 responsibilities (clarified upon notification).

- If the child ordinarily resides 50/50 in 2 LAs, then both LAs can discuss and agree sharing the responsibilities for S19 provision. If an agreement cannot be reached, then the LAs can write to the Secretary of State for a decision.

Child with an Education Health and Care Plan:

- The LA who is responsible to maintaining the EHC plan is responsible for maintaining their provision; this includes section 19 provision
- Even if a school in another local authority is named in the EHCP, the LA responsible for maintaining the plan is responsible for the section 19 provision

Child in the care of a Local Authority:

Gloucestershire County Council recognises the importance of distinguishing between Residence based (detailed above) and Corporate Parenting based Section 19 responsibilities.

In line with the Care Planning, Placement and Case Review (England) Regulations 2010, requiring the 'responsible authority to plan placements and avoid disruption to education', Gloucestershire County Council

- Commits to assess the need to arrange alternative education provision for a child in care for whom it has Corporate Parenting responsibilities.
- This commitment is regardless of where that child has been placed and resides.

For children placed/ residing in Gloucestershire, but for whom another Local Authority holds Corporate Parenting responsibilities:

- The 'responsible' Local Authority will be required to determine the need for and where required arrange that Alternative Education Provision, under their published Section 19 policy and associated duty.

- 1.5. The Section 19 duty placed on Local Authorities' and detailed in this Policy relates to those of compulsory school age – Child aged 5 – 16 (from school term after a child's 5th birthday, until last Friday in June of the school year they turn 16).
- 1.6. The [Out of School, out of sight](#) Publication (2022) states: "*where a child cannot go to school, the local authority must find out why*". To support Gloucestershire County Council with this responsibility, schools are required to act on points 1.7 & as necessary, 1.8 of this policy
- 1.7. The home school has duties as outlined in [Regulations 13\(7b\) 13\(9\) 13\(10\) and 13\(11\) of The School Attendance \(Pupil Registrations\)\(England\) Regulations 2024](#) to provide to the local authority, at agreed intervals, the full name and address of any registered pupil of compulsory school age who are not attending school regularly (including due to their health needs). For 10-day unauthorised absences (Regulation 7) this duty is considered met by sharing attendance data through the DfE's 'View Your Education Data' processes. In respect of the 'sickness return', schools should submit a short online notification form using the following link: [Sickness Return | Gloucestershire County Council - GDPR – Gloucestershire Forms](#). A review of the children for whom a notification is received will be undertaken periodically at the schools Targeting Support Meeting.

- 1.8. Where a school feels that they are unable to remove the barriers preventing a child from accessing education, they can request that the Local Authority considers the need to arrange alternative education provision by completing a Section 19 referral (See Section 3 for eligibility criteria and 3.6 for a link to the referral). This process will be in addition to the requirement detailed above in 1.7.
- 1.9. The Education Act 1996 also places a duty on schools to provide education in the interim period while an assessment of need is undertaken to inform the LA's requirement to arrange Alternative Education Provision (AEP) under Section 19 of the Education Act 1996, this should be provided through remote education provision or other means as a soon as reasonably practicable, and until the LA has concluded its assessment. Gloucestershire County Council is clear it cannot be responsible for providing AEP until it has been determined it has a duty to do so, following the assessment period.
- 1.10. Where the Local Authority offers (based on an assessment of need) a package of alternative education that it deems to be reasonably practicable for that child it is not under a duty to provide further alternative education because the child is not taking advantage of that facility. Any Alternative Education Provision arranged should be considered as a short-term intervention, with the expectation it will support the child to reintegrate with education on the site of their home school at the earliest opportunity, a principle that schools, parents, children and partners are required to commit to.
- 1.11. Parents should be aware that it is their duty under [Section 7 of the Education Act 1996](#), to secure an education for children of compulsory school age, which in this circumstance is the full and holistic package of support agreed and deemed reasonably practicable to access following the Section 19 assessment period.

2. The Local S19 Offer in Gloucestershire

- 2.1. This section provides an overview of GCC's offer for Children who require a section 19 response under the three identified categories:
- Permanent exclusion
 - Illness
 - Otherwise

Permanent Exclusion

- 2.2. *'If a child has been permanently excluded from school, the council must arrange alternative education from the sixth school day following the exclusion, although it may start sooner. Local Government and Social Care Ombudsman [‘Out of School, Out of Sight?’](#) 2022. Also referred to in DfE's Alternative Provision Statutory guidance for local authorities.'*
- 2.3. Provision of education for permanently excluded pupils is ordinarily overseen and/ or delivered by the Local Authorities Alternative Provision school ([The Altus School](#)) which is commissioned to provide a county wide service offer.
- 2.4. The Altus school is commissioned to arrange and provide a suitable education, which includes tailored to the individual needs of the children and young people. It is critical that mainstream schools provide the Altus school with detailed information about the

needs of the child and the support that has already been put in place through the Graduated Pathway.

- 2.5. Following permanent exclusion, The Altus school, supported by the local authority and wider agencies, are responsible for enabling the child to reintegrate back into a sustainable education place. In exceptional circumstances where a Child is in receipt of an EHCP is excluded from a specialist education provision and where Altus school are unable to meet the specific needs identified in that Childs EHC Plan without additional support, the EHCP and Specialist Commissioning services will work closely with the excluding school and Altus to put in place an interim education offer.

Illness

- 2.6. Schools and Parents in Gloucestershire should read this policy alongside the statutory guidance for [‘Supporting pupils at school with medical conditions’ 2015](#), the [Children and Families Act 2014](#) and the [SEND Code of Practice 2015](#), which highlight their legal duty to ‘support pupils with medical conditions’. Prior to requesting that Gloucestershire County council considers the need for Alternative Education Provision for a child with identified needs relating to illness, schools should refer to their own Medical Needs policy (as required by the statutory guidance) and consider seeking advice from health professionals, including (where other avenues have been exhausted) Gloucestershire’s Designated Clinical Officer glicb.dco-gloucestershire@nhs.net.
- 2.7. *‘If a child is unable to attend school because of illness), the council must make alternative arrangements once the child has been absent for 15 days, either consecutively or cumulatively. The council must consider the individual circumstances of each child and take account of any medical evidence or advice when deciding what arrangements to make.’* Local Government and Social Care Ombudsman ‘Out of School, Out of Sight?’ 2022
- 2.8. In Gloucestershire we have two approaches for Children requiring a Section 19 response under the category of illness, ensuring that we adhere to the Statutory guidance [‘Arranging education for children who cannot attend school because of health needs’](#) (2023). In relation to this cohort of Children, GCC adopts an agile response to understanding needs and reaching a decision point as required by DFE guidance:
- ‘LAs must **not follow an inflexible policy of requiring medical evidence before making their decision** about alternative education. LAs must look at the evidence for each individual case, even when there is no medical evidence, and make their own decision about alternative education.’* [Responsibilities where mental health issue is affecting attendance](#) Feb 2023
- 2.9. Group one is applied for those that meet eligibility criteria for Gloucestershire’s Hospital Education Service (GHES) ‘core offer’ and can be accessed by select medical professionals actively providing treatment for a child. Group 2 is for those Children whose needs don’t meet the Group 1 (GHES ‘core offer’) admissions criteria, but whose needs still prevent a Child being able to access education. Schools can refer children for consideration under Illness Group 2.

Illness Group 1 – Gloucestershire Hospital Education Service (GHES) ‘Core Offer’.

- 2.10.** GHES is a short-term medical Pupil Referral Unit providing teaching and support for children of compulsory school age who reside in Gloucestershire (or where GCC maintains that Childs EHCP) who, due to illness, require suitable alternative arrangements for their education whilst unwell. This may be following an admission onto the children's ward at Gloucester Royal Hospital or through a referral by a paediatrician or CAMHS care coordinator to the outreach team.
- 2.11.** GHES have a clear [Admissions Policy](#) and criteria which requires the online referral (see link in section 3.5) to be supported and submitted by the medical professional responsible for the ongoing treatment. This enables ongoing advice and guidance for GHES to enable them to build the right educational provision around a Childs health need.
- 2.12.** GHES can only be referred to directly by a medical professional with oversight for the treatment of a diagnosed illness. It is not directly accessible via a schools Section 19 referral*.
**Schools are expected to submit supporting information (via an online link that will be provided) to enable GHES to make informed decisions about the most appropriate Education Provision for those children that medical professionals refer, and to engage with any offer of Alternative Education Provision.*

Illness Group 2 – Health needs not meeting GHES ‘Core Offer’ admission criteria.

- 2.13.** Where a Child is referred directly by a school due to ongoing illness that is acting as a barrier to a child accessing education that may or may not be supported by a medical professional, GCC will work closely with multi-agency partners with relevant expertise to ascertain the most appropriate package of Alternative Education Provision and/ or wider partnership support.
- 2.14.** As part of this process, GCC will consider the individual circumstances of each child; including how the home school has provided support through a [graduated response](#) and what reasonable adjustments have been put in place to support the child to attend school, such as a reduced timetable or access to pastoral unit. GCC will also consider any medical evidence or advice and evidence of child/ parental engagement with support offered when deciding what arrangements are required to fulfil a suitable education.
- 2.15.** Where arrangements are made for Alternative Education Provision (AEP) by GCC (under Group 1 or 2), the parent and home school will be required to work closely with the AEP Provider to work towards re-integration with the home school at the earliest opportunity. The home school will keep the pupil on roll and retain safeguarding responsibilities, including attendance monitoring to inform absence recording and coding.

- 2.16. All referrals received under the 'Illness' category will be triangulated to ensure Gloucestershire County Council is adopting a flexible approach to assessing and meeting needs. This could result in any referral being progressed under Illness Group 1 or 2 dependant on the individual needs of the child and subject to admissions criteria.

Otherwise

- 2.17. ***"Otherwise" is a broad category which covers circumstances other than illness or exclusion in which it is not reasonably possible for a child to take advantage of any existing suitable schooling. In all cases, councils must consider the individual circumstances of each particular child and be able to demonstrate how they made their decisions. They must take account of all available evidence and record the reasons for their decisions. They may need to make decisions in cases where they do not have all the evidence they would like.'*** Local Government and Social Care Ombudsman 'Out of School, Out of Sight?' 2022f

'Otherwise' (as opposed to illness or exclusion) is intended to cover other situations in which it is not reasonably possible or practical for a child to access and take advantage of any existing suitable schooling. GCC will only provide education under the 'Otherwise' category if it assesses that it is not possible for a child to receive a suitable education at their current school. In these circumstances, it is expected that the home school would have provided support through a graduated response, that initial assessments will have taken place and that Parents will be engaging to the support that has been made available, in line with their duty under Section 7 of the Education Act 1996.

'Otherwise' consists of several scenarios; these include (in bold):

- 2.18. **Scenario 1: When a child has had 10 or more continuous days of unauthorised absence** - Schools have a legal responsibility under Regulation 13 of the 'Education (Pupil Registration) (England) Regulations 2024' to make the local authority aware when a child has been absent for 10 or more continuous days of unauthorised absence, and it is anticipated that the absence will continue past 15 continuous days. A section 19 response for this cohort is only applicable where a school decides it is **not appropriate** to pursue a legal attendance route. GCC deems this has been initiated when the school have notified the parent, in writing, of their intention to consider a legal intervention.
- 2.19. **Scenario 2: Where a child has been absent for a continuous or cumulative period of 15 school days (authorised or unauthorised) and where the reason for absence is connected** - Section 19 of the Education Act 1996 requires that the LA assess whether it needs to provide education for these authorised absences. A section 19 response for those Children with unauthorised absence is only applicable where a school decides it is **not appropriate** to pursue a legal attendance route. GCC deems this has been initiated when the school have notified the parent, in writing, of their intention to consider a legal intervention.
- 2.20. For both authorised and unauthorised absences in scenario's 1&2 GCC will assess whether S19 education provision should be arranged on a case-by-case basis and will communicate with the school their decision and reason.

- 2.21. For scenarios 1 & 2, GCC will check that a school has looked at and put in place all other reasonable alternatives for providing the child with a suitable and full-time education, which is likely to include reasonable adjustments and alternatives such as appropriate interventions, changes to the timetable (where appropriate), and/or the provision of an alternative curriculum. GCC will only arrange education under the 'Otherwise' category if we assess that it is not possible for a child to receive a suitable education at their current school, and where arrangements are made the home school will be required to keep the child on roll and retain safeguarding responsibilities, including monitoring daily attendance in order to complete the attendance register accurately in accordance with Regulation 10 of The School Attendance (Pupil Registration) (England) Regulations 2024.
- 2.22. **Scenario 3: When a child is not on a school roll including where a child has been de-registered from Elective Home Education (EHE) after the 15th day** - The LA has responsibility for arranging suitable education after day 15 for children who are missing education (CME). This means they are not on roll of a school and are not Electively Home Educated. Parents should read this policy for a Child not on a school roll alongside Gloucestershire County Council's (GCC's) [School Admissions Policy](#), which provides detail of how a parent/ guardian can meet their statutory duty outlined in Section 7 of the Education Act to '*secure an education for a child of compulsory school age*'. Further support or guidance can be provided by GCC's In Year Admissions Team inyear.admissions@gloucestershire.gov.uk.
- 2.23. If the LA does arrange and provide education under scenario's 1, 2 & 3, it is doing so under the guidance provided in the DfE guidance [2013](#) & [2023](#), and the provision should be short-term, with a view to the child being re-integrated at the earliest opportunity back into their home school, or for Child Missing Education (scenario 3), being allocated a suitable and permanent school place.
- 2.24. **Scenario 4: When a child with an EHCP isn't accessing the appropriate provision detailed in their plan** - If it is believed that it is inappropriate for the provision outlined in the EHC plan to be made in a school or by a child's parent as part of their Elective Home Education offer, this concern should be raised with the Childs EHCP case co-ordinator so that consideration can be given to the need for an annual or interim review. Where the barrier to accessing the appropriate provision named in the EHC Plan is believed to be due to illness, the case co-ordinator may opt to signpost the school to consider a Section 19 referral under the category of illness (See sections 2.6 - 2.16).
- 2.25. **Scenario 5: When a child with an EHCP doesn't have a school place** - If a child with an EHCP isn't on roll at a school, including where a child has been de-registered from Elective Home Education (EHE), the EHCP Service may decide to arrange Exceptional Provision for them under [S42 2014 Children and Families Act](#).
- 2.26. **Scenario 6: Safeguarding Separation** – Where temporary arrangements are deemed necessary to prevent contact between pupils to mitigate safeguarding risks, requiring the temporary removal from school site of one or more child/ children.

The need to progress a referral in this scenario will be rare, given that schools and trust governing bodies are responsible for implementing reasonable adjustments to ensure children receive a full and appropriate education. If, however, after full consideration of the circumstances a school believes it is unable to manage risks

within the school environment or by providing/ commissioning temporary offsite learning it can ask Gloucestershire County Council to consider the need to arrange a temporary, alternative education provision under its Section 19 duty.

Prior to any referral schools should read and consider GCC's '[Safeguarding Separation of Pupils' guidance](#) and be aware that the child's AWPU funding is likely be utilised by GCC to fund any provision arranged under this scenario for the duration of that provision (see section 3.3).

- 2.27. In Gloucestershire Amanda Henderson (Head of Service for Children with Special Education Needs and Disabilities - SEND) is the Named Officer with oversight for Children with Additional Health Needs. Arranging Alternative Education Provision is a responsibility delegated to a Forum Lead (Section 19 fora are detailed in the S19 Process chart embedded in this policy), overseen by Gloucestershire's Education Strategy & Relationships Manager. The Named officer will be accountable for undertaking periodic, thematic reviews to identify and systemically respond to cohorts of Children requiring access to Alternative Education Provision. These reviews will be a shared responsibility with the Designated Clinical Officer (Integrated Care Board) and the Designated Social Care Officer (Local Authority).

3. Process for Accessing Section 19 Provision

- 3.1. The DfE's [Alternative Provision: Statutory guidance for local authorities](#) states: '*While there is **no statutory requirement as to when suitable full-time education should begin for pupils placed in alternative provision for reasons other than exclusion**, local authorities should ensure that such pupils are placed as quickly as possible.*'
- 3.2. To ensure this is achieved, it is important that the local authority, home school and family work together through the processes described below and in the best interests of the child. Failure of any one partner to engage fully could add delay to a decision being reached by Gloucestershire County Council*.
- 3.3. **Where a home school is not pro-actively seeking to remove educational barriers or engaging with the Local Authority to promote and enable the best outcomes for a Child on their role, Gloucestershire County Council reserves the right to withdraw/ reclaim the AWPU funding for that Child to support provision that it arranges.*

Permanent Exclusions:

- 3.4. Where a school has taken the decision to permanently exclude (PEx) a Child they should complete the PEx notification form **on the day that the decision is taken** to issue the Exclusion. The form can be accessed via the following link <https://forms.gloucestershire.gov.uk/SchoolExclusion>
- 3.5. It is critical that the mainstream school provides detailed information about the reason for permanent exclusion, the needs of the child and the support that has already been provided. This will enable a much smoother transition to Alternative Provision.

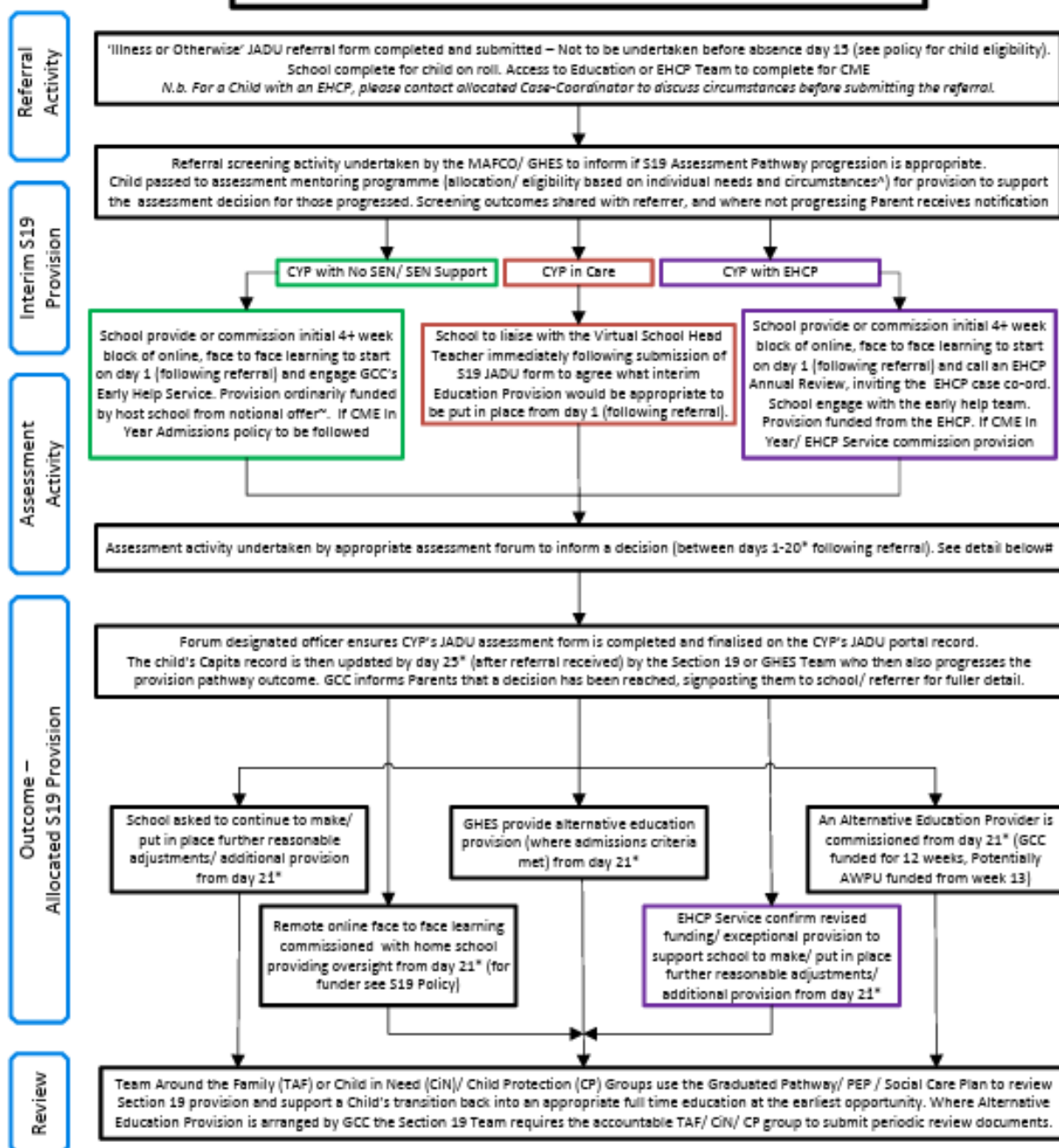
Illness or Otherwise:

- 3.6. Where a Child is under the treatment of a **medical professional** and has been, or is expected to be absent from their home school for a period of 15 or more school days in the same academic year, the medical professional can consider the need to request that Gloucestershire's Hospital Education Service assess the need to provide Alternative Education Provision (AEP) for a fixed period by completing an Illness Group 1 request form which can be accessed via the following link:
<https://forms.gloucestershire.gov.uk/GHESServiceRequestForm>
- 3.7. Where a Child is not accessing a full education under the criteria laid out in this policy under the headings 'illness' or 'otherwise' for a period in excess of 15 school days for the same or linked reason in the same academic year a **school** can consider the need to request support from the Local Authority; please refer to the process below, which is initiated by the completion of the notification form which can be accessed via the following link: <https://forms.gloucestershire.gov.uk/S19Form>.
- 3.8. The home school will retain safeguarding (including absence monitoring) and school census responsibilities for all Children for whom the Local Authority arranges Alternative Education Provision as the sole or (main) dual registered provision. This includes exam entry responsibilities that fall under the remit of its Examinations Officer.
- 3.9. Where a child is eligible for free school meals the home school is responsible for ensuring that the entitlement is made available to that child, regardless of where learning is taking place. This is to be funded from the Free School Meal and Pupil Premiums that school draw down directly from the Department for Education.

* If a school is unauthorising an absence and/or believes that the legal attendance route might be needed, that school should approach their named GCC Inclusion Officer for a discussion **before** completing the Illness or Otherwise notification form.

** *information is stored and shared in line with our Privacy Notice' and a link to GCC's corporate privacy notices that can be accessed here: [Privacy Notices | Gloucestershire County Council](#)*

S19 'Illness' & 'Otherwise' Referral Process Flowchart



S19 Assessment Forums:

Illness 1 – GHES Admissions Panel
 Illness 2 – TALC/ IC or EHCP Tier C Panel/ C/C Emergency PEP Review
 Otherwise 1 – TALC/ IC or EHCP Tier C Panel/ C/C Emergency PEP Review
 Otherwise 2 – TALC/ IC or EHCP Tier C Panel/ C/C Emergency PEP Review
 Otherwise 3 – Exceptional Circumstances Panel
 Otherwise 4 – NA
 Otherwise 5 – Exceptional Circumstances Panel/ C/C Emergency PEP Review

All CYP CYP with No SEN or SEN Support CYP with an EHCP Children in Care

[^] SEN Support and No SEN need, where being discussed at a TALC or IC and where input/ advocacy can't be provided by a service already engaged with the child.

[^] Exceptions (although likely to be rare) can be discussed & determined on a case by case basis with GCC's S19 Team - initiated by the host school.

[#] GCC Aspiration not a Statutory Requirement

4. Section 19 Assessment

- 4.1. The Local Authority is responsible for assessing the unmet needs of the child that determines the requirement for Alternative Education Provision (AEP). Where it is deemed necessary it then has a responsibility to arrange that AEP once that Child has been absent for a period of 15 continuous or cumulative school days in the same academic year for the same or linked reason. In deciding what provision should be put in place the Local Authority will consider the child's needs based upon appropriate assessments and any evidence provided by the home school, other professionals and the family.
- 4.2. GCC expects that the Graduated Pathway/ a Graduated Approach has been mobilised for any Child being referred for S19 provision and there should be a My Plan Plus informed by a holistic, whole family assessment in place for each child being referred. A copy of these documents should be attached to the JADU request form submitted. The Graduated Pathway documentation is key to informing GCC's decision about what an appropriate S19 offer should contain, however, if this isn't in place S19 provision will still be considered based on the information made available and arranged if agreed.
- 4.3. Where the child is at school, the school knows the child/ family and their individual circumstances well, so the information we require from the school is critical for the right decision to be made. This is why for any child on a school roll the school are required to submit the Section 19 request. Where the child is not at school the LA will use evidence available but may require further assessment from a range of professionals to make a decision.
- 4.4. The JADU (online portal) request form when completed in full will provide GCC with relevant and essential information alongside the Graduated Pathway documentation in order to be able to assess the need for S19 provision. Where insufficient information is available, the referrer may be asked to re-submit a more detailed referral. This supports the principle that quality information leads to a quality, child centred decision.
- 4.5. Where a parent makes a request directly to Gloucestershire County Council to assess the need to provide alternative education provision for their child, a robust internal process supports a conversation between the LA and the child's school to inform a robust decision about their need to submit a Section 19 referral request. Throughout this process the parent will be kept informed about progress.
- 4.6. The assessment undertaken by GCC legally must include the following:
- Is the child of compulsory school age?
 - Would the child receive suitable education without alternative S19 provision?
 - Is it reasonably possible or reasonably practicable for a child to attend school? *This is an objective test with a high bar and is to be assessed by GCC. If no, then alternative education must be arranged.*
 - What alternative educational provision is suitable, reasonably possible, and reasonably practicable for a child to access? This is a factual question for the LA to determine and will depend on the specific facts of the case.
 - If the child is a child with SEND, will the child not receive suitable education unless such alternative education arrangements are made for them? *This is fact specific; the focus is on whether GCC has provided suitable education that*

it is reasonably possible or practicable for a child to access. This is an objective assessment, and the views of the parents are not determinative.

- Is the child unable to attend school but able to learn?
- What is their suitability for independent learning and what are the home circumstances?
- What are the child's needs? Age, ability, aptitude, and any special educational needs. What do these suggest a suitable and efficient education needs to involve?
- How are these needs best to be met?
- What assessments have been undertaken in school and what have these identified?
- Is there a medical opinion? What is the supporting medical evidence?
- What other evidence is available and what is this suggesting?
- What is the plan for reintegrating back into school? *Alternative Education Provision should be seen as an intervention for the shortest possible period of time and not as a destination for the child.*
- Are there reasons relating to the child's physical or mental health which would suggest that, in the interests of the child, part time education is more suitable than full time education?
- Would remote education adversely affect the child's return to school?
- Would children with long-term medical conditions or any other physical or mental health needs affecting attendance require additional support to continue their education?

4.7. GCC will record discussions and assessments undertaken by panels/ partners responsible for S19 provision decisions on a Child's Capita Pupil record and will inform the referrer of the outcome. GCC will inform the parent that a decision has been reached, however it is the referrer's responsibility to communicate the outcome and rationale. This responsibility is placed on the referrer as they have a direct relationship with the child/ family.

4.8. The Team Around the Family (TAF) or Child in Need (CIN)/ Child Protection (CP) group is responsible for monitoring progress for the Child, including holding all parties accountable for their part in supporting/ promoting progress that supports re-integration with the home school. The group is also responsible for undertaking regular reviews. Reviews are completed and submitted through the JADU portal and will be requested 3 weeks prior to the end of the agreed period of Section 19 provision.

4.9. Should a child's needs/ circumstances change following a decision that agrees the need to arrange AEP, the referring professional on behalf of the multi-agency group can supply evidence and request that provision is amended by contacting the Section 19 team S19Referrals@gloucestershire.gov.uk prior to the review paperwork being issued. Requests will be fully considered based on the information the group provides; however, this will not automatically result in amended provision being made available.

4.10. Where it is assessed, there is not a requirement to provide alternative education provision (AEP) under Section 19 of the Education Act, this decision is final. Only where it can be evidenced that a child's needs have changed or that new evidence can be provided will GCC re-visit the need to arrange AEP. This is initiated by the submission of a new Section 19 request by the home school.