

# INSPECTION OF PETERBOROUGH LOCAL EDUCATION AUTHORITY

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OFFICE OF HER MAJESTY'S CHIEF INSPECTOR OF SCHOOLS in conjunction with the AUDIT COMMISSION

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**APPENDIX: RECOMMENDATIONS** 

#### INTRODUCTION

- 1. This inspection was carried out by OFSTED in conjunction with the Audit Commission under Section 38 of the Education Act 1997. The inspection used the *Framework for the Inspection of Local Education Authorities* which focuses on the effectiveness of local education authority (LEA) work to support school improvement. The inspection also took account of the Local Government Act 1999, insofar as it relates to work undertaken by the LEA on Best Value.
- 2. The inspection was partly based on data, some of which was provided by the LEA, on school inspection information and audit reports, on documentation and discussions with LEA elected members, staff in the education department and in other council departments and representatives of the LEA's partners. In addition, a questionnaire seeking views on aspects of the LEA's work was circulated to 76 schools. The response rate was 88 per cent.
- 3. The inspection also involved studies of the effectiveness of particular aspects of the LEA's work through visits to six secondary schools, 15 primary schools and one nursery school. The visits tested the views of governors, headteachers and other staff on the key aspects of the LEA's strategy. The visits also considered whether the support which is provided by the LEA contributes, where appropriate, to the discharge of the LEA's statutory duties, is effective in contributing to improvements in the school, and provides value for money. Evidence was also drawn from recent visits to Peterborough schools by Her Majesty's Inspectors of Schools (HMI) as part of national monitoring work.

#### COMMENTARY

- 4. Peterborough Local Education Authority came into being in April 1998 when unitary status was granted to the council. The city comprises several 'townships' with varied socio-economic indicators. Some areas are relatively advantaged, but there are significant pockets of deprivation and three wards are in the ten per cent most deprived wards in England. The proportion of pupils eligible for free school meals for the LEA as a whole is slightly above the national average and well above that for similar LEAs.
- 5. Standards of attainment in the LEA's schools are mostly in line with schools nationally but are generally low compared to those for similar LEAs. They are now improving faster than nationally at Key Stages 1 and 2 but there is insufficient progress at Key Stage 3 and Key Stage 4. The number of schools with identified weaknesses has been reduced and several schools have been awarded Beacon status.
- 6. The council has given a very high priority to improving education as part of its measures to develop the city, and funding for schools has been increased significantly over the period of unitary status. However, early progress in the establishment of the LEA was dogged by very high levels of turnover among senior staff. There was some poor planning, a lack of strategic focus on crucial aspects such as reducing social exclusion, and too little monitoring and evaluation of the impact of the LEA. Many schools had a lack of confidence in the LEA in the past. Some important aspects of this legacy remain weak and need further urgent attention.
- 7. Notwithstanding the above, this is a rapidly improving LEA. Peterborough LEA is now fulfilling its functions satisfactorily overall, and its strengths outweigh its weaknesses. Much has been done, particularly recently, to address many of the weaknesses. A new and very effective director of education was appointed at the start of the present academic year, and there has been a major reorganisation of the education department. Together with elected members, officers are now providing clearer leadership and the partnership with schools to support improvement has been much more clearly defined.
- 8. There are obvious and significant signs of progress in many areas of the LEA's work. A great many areas that are now satisfactory, such as support for governors, the collection and analysis of data, monitoring, challenge and intervention, are satisfactory only because of recent efforts to improve them. Some areas of support provided by the LEA are now strong. These are:
- leadership provided by senior officers and elected members;
- support for numeracy;
- support for literacy;
- · support for schools causing concern; and
- support for early years education.
- 9. Nevertheless, much remains to be done. Strategic planning has improved considerably but the modified Education Development Plan (EDP) does not reflect a

sufficiently clear analysis, or focused actions related to important weaknesses such as the low overall standards and surplus places in the secondary sector.

- 10. The following functions all show some signs of improvement but they remain unsatisfactory:
- support for Information and Communications Technology;
- provision for education otherwise than at school;
- support for improving behaviour;
- support for minority ethnic children;
- measures to combat racism;
- provision of school places; and
- monitoring of corporate plans.
- 11. In effect Peterborough LEA has had to reinvent itself in the last twelve to eighteen months. With the support and leadership of the chief executive and elected members, the restructuring of the education department has placed support for school improvement at the fore of all activity. Sensibly, the director of education has prioritised the large number of issues facing the LEA and made mostly good progress on those aspects addressed so far. Progress has been limited only by the relatively small size of the senior team. The commitment to further progress is very high at all levels of the organisation. Schools now have a better understanding of the respective roles of schools and the LEA and, importantly, they are much more optimistic about the capacity for further improvements.
- 12. The improvements already made have the potential to impact significantly and positively on the work of schools. An inspection early in the new cycle is recommended to ascertain the extent to which the improvements have been embedded and built upon, but the inspection team do not doubt the LEA's capability to tackle the remaining agenda.

#### SECTION 1: THE LEA STRATEGY FOR SCHOOL IMPROVEMENT

#### Context

- 13. In the 1960s Peterborough experienced a significant transformation from a market town on the edge of the Fens to a city with three 'townships' surrounding it. The development of Peterborough's fourth township is now gathering momentum. The city currently has a population of 156,000 with a total of 29,411 pupils on roll in LEA maintained schools and nurseries. The forecast to 2006 is for 'sustained growth'.
- 14. The vast majority of Peterborough's population (87 per cent) lives in the 18 urban wards. Three wards within the city are in the ten per cent most deprived wards in England and a number of fringe estates experience deprivation and significant social problems. The proportions of pupils from the city in homes with higher education qualifications or from homes in social classes 1 and 2 are below the national averages.
- 15. Eight per cent of the city's population are from ethnic minority groups. Non white ethnic minorities constitute 16.6 per cent of the school population and an additional 3.8 per cent of the school population is non-UK white. Peterborough has recently been designated a cluster area for receiving asylum seekers.
- 16. The percentage of pupils eligible for free school meals (20.2 per cent) is slightly above the national average and well above that for similar LEAs (statistical neighbours). Some schools have a very high percentage of pupils eligible for free school meals; four primary schools have over 50 per cent. The proportion of pupils who have statements of special educational need (SEN) is broadly in line with the national figure.
- 17. The local education authority is responsible for one nursery school, 58 primary schools, 13 secondary schools, four special schools and two pupil referral units. Six secondary schools are community schools, two are voluntary aided and five are foundation schools. One primary school is a foundation school. There are three secondary and one primary Beacon schools and two specialist colleges. A consortium of three secondary schools form a designated training school for teachers. All secondary schools have sixth forms and 72.2 per cent of pupils continue in education or training post 16. There is one further education college in the city.
- 18. The LEA came into being in April 1998 when unitary status was granted to the council. The LEA's early history was characterised by substantial and disruptive changes in senior personnel and by a reported lack of confidence in the LEA on the part of many schools. The first director of education resigned in March 2000 and an acting director was seconded from headship in a neighbouring authority in April 2000. This appointment was made substantive at the end of the summer of 2000.

#### Performance

- 19. A detailed analysis of the performance of schools in Peterborough has been supplied to the LEA in the form of the OFSTED statistical profile, from which some of the following information has been extracted. Other information has been supplied directly by the LEA.
- Peterborough's baseline assessment data and OFSTED reports indicate that pupils' attainment on entry to primary schools is below average.
- The pattern of pupils' achievement across the four key stages is complex and shows some variation between key stages. At Key Stage 1, attainments are generally weak compared to similar LEAs and nationally. At Key Stages 2,3 and 4, overall standards are in line with those nationally but they are often low compared to similar LEAs. The exception is at Key Stage 2 in English and science where they are in line with similar LEAs. Encouragingly, attainment is improving rapidly in Key Stages 1 and 2 where the LEA has focused its support. Here the LEA has exceeded the targets set out in its Education Development Plan (EDP) and improvements are generally greater than for statistical neighbours and nationally. At Key Stage 4, although some schools do well, overall attainments in GCSE examinations are below those of similar LEAs, and the rate of improvement, particularly in the five or more grades A\*-C category, is unsatisfactory.
- OFSTED reports show that fewer primary phase schools have been judged to be good or very good overall compared to statistical neighbours and nationally, although more secondary schools have been judged good or very good overall. Relatively few schools in either the primary or secondary phases are judged to be good or very good in terms of the standards achieved by pupils.
- Two of Peterborough's schools require special measures and a further two, including one pupil referral unit (PRU), have been judged to have serious weaknesses. One school has been designated by the LEA as causing concern.
- Attendance rates in primary and secondary schools are in line with the national average but, in secondary schools, attendance is below that for similar LEAs. Unauthorised absence is above average in primary schools and in line with national figures in secondary schools. The proportion of pupils permanently excluded from primary schools is above the national average and that of similar LEAs, but in secondary schools it is in line with the national average and that of similar LEAs.

#### **Funding**

20. Peterborough LEA funds its schools well. The Standard Spending Assessment for 2001-2002 allocated Peterborough £2,930 per pupil compared to a unitary authorities average of £2,907 and a national average of £3,049.

- 21. Since 1998, the LEA has raised spending on education from well below the Standards Spending Assessment (SSA) to almost one per cent above it in 2001/02 and it has secured the full amount of Standards Fund. The funding received is above average when compared to the unitary authority average and a comparatively high proportion is devolved to schools. Grant income from sources other than Standards Fund was lower than comparable authorities in 2000/01, reflecting the level of need in the authority. Funding additional to the SSA in 2001/02 has been secured at an appropriate level to address social inclusion, community needs and post 16 learning partnerships. Additional funding such as Sure Start and New Opportunities funding have been appropriately focused toward areas of high community need.
- 22. There has been significant growth in capital spending which increased from £2.9m in 1999/00 to £5.6m in 2000/01. This is above the average for statistical neighbours and unitary authorities. In addition, £6.7m is to be spent over three years to address the condition of school buildings. Over £4.2m has been secured from New Deal for School bidding rounds over the past three years. New schools are to be built to cater for new areas of population. One is already complete. Overall, the council manages its assets effectively.

#### **Council structure**

- 23. The council is in the process of modernising its structures. It currently operates with a policy committee and separate service committees, but will move to a leader and cabinet structure in September 2001. The education committee meets five times per year. Officers provide satisfactory information and advice for these meetings and there are appropriate briefing and consultation meetings for all parties between committee meetings. An elected members' education select panel meets every two months to receive school OFSTED reports and to monitor progress against action plans for schools causing concern. Relationships between elected members on the education committee and LEA officers are increasingly effective with the education spokespersons and senior officers working well together with a common sense of purpose. There is a clear understanding and agreement that a central purpose of the LEA is to support school improvement.
- 24. The education department was completely reorganised into a new, leaner structure from September 2000. This reorganisation replaced the three previous divisions with two 'services'. 'School improvement and lifelong learning services' has responsibility for most aspects of support and challenge to school standards, including the work of the advisory team. 'Strategic Services' has oversight of policy, information and planning as well as the SEN and educational psychology teams. The reorganisation has been highly effective in clarifying roles and responsibilities and, importantly, establishing a common philosophy and culture within the department.
- 25. The new structure of the department successfully focuses resources on supporting school improvement and the reorganised physical layout of sections within the building facilitates better communications. The establishment of a senior post as a 'link' between education and social services has enabled some effective

project management, but not yet brought about the necessary degree of coordination at school level between these two areas. The current organisation of the department has enabled officers to begin to remedy very effectively many significant immediate issues facing the LEA. However, the department is now very lean, given the range of tasks it faces. It is unlikely to have sufficient management capacity to address the large number of remaining issues such as the preparation of the next Education Development Plan (EDP), the integration of this with corporate ambitions on inclusion, and the emerging priority issues related to secondary schools.

#### The Education Development Plan

26. The latest version of the EDP represents an improvement on its predecessor, although it remains flawed in some important respects. However, there was little time for large scale changes following the appointment of a new director and there was a realistic recognition that the lifespan of the present EDP is limited because of the arrangements for producing the next round of EDPs. As such, it represents a sensible compromise by retaining coherence with the earlier priorities while regrouping them and making the intended actions more manageable. Significantly, the latest version is now being linked much more deliberately with a regime of rigorous monitoring and evaluation to establish the LEA's success against the identified priorities; this evaluation has been absent or poor in the past.

#### 27. The priorities given in the EDP are:

- support for the leadership, management and governance of schools;
- improve standards and increase the rate of progress in Literacy at Key Stages 1,2 and 3;
- improve standards and increase the rate of progress in Numeracy at Key Stages 1,2 and 3;
- improve standards and increase the rate of progress in Science at Key Stages 1,2 and 3;
- improve standards and increase the rate of progress in Information and Communication Technology at Key Stages 1,2 and 3;
- identify and address factors which adversely affect pupils' learning and attainment;
- improve standards and increase the rate of progress for pupils with Special Educational Needs; and
- improve standards of under-achieving groups of pupils.
- 28. The current EDP has several weaknesses. The match between the stated priorities and those currently emerging as more significant, such as the low standards at Key Stage 4, is not good. The plan is poor on information about costs and too many success criteria are weak. Cross-referencing to other corporate plans, such as the social inclusion strategy, is insecure.
- 29. Nevertheless, schools understand and agree with the priorities and there is evidence that many schools have used the EDP as a basis for some of their own school improvement planning. With the exception of attendance, the LEA exceeded all its statutory targets for 2000. Progress in implementing the first four priorities has been at least satisfactory, and good in relation to key issues for school improvement such as literacy and numeracy. Progress has recently improved on the other

priorities, for example on SEN, where a stalled review has been effectively revived in the last few months. Importantly, the remaining weaknesses have been recognised by senior officers who are planning to base the next EDP on a more up to date audit and to focus actions more effectively on areas of greatest need.

#### The allocation of resources to priorities

- 30. The LEA's approach to allocating resources to priorities is satisfactory overall. The overall resource allocation reflects the council's strategic priorities, including improving standards and aspects of social inclusion. A three year financial plan enables resources and actions to be planned over time. However, the lack of attention to costing in some plans such as the EDP is a weakness.
- 31. The LEA has increased levels of spending at least in line with the SSA and has channelled growth into school budgets. In 2000/01, the Individual Schools Budget (ISB) for primary schools was £47 above the average for unitary authorities (£1,807) and the secondary ISB was £79 above the average (£2,524). Bidding for grants is satisfactory.
- 32. The distribution of funding across primary and secondary schools favours Key Stage 4 and sixth forms. Funding for special schools is well above average. More special school places are available than are needed. However, reviews of the Local Management of Schools funding formula and of special education are underway.
- 33. Delegation of funding to schools is high, supporting autonomy. It is now 88.1 per cent which exceeds the government target of 85 per cent. The local schools budget per pupil in 2000/01 was £2,817. This is above the average for unitary authorities and the national average. Funds for pupils with statements of special educational needs are delegated to schools. They are, however, neither financially audited nor professionally monitored. This is unsatisfactory.
- 34. A two-phase review of the LMS formula is underway. The first phase of the review has appropriately placed greater emphasis on focusing funding towards overcoming under achievement. Formula factors for social deprivation, special educational needs and low prior attainment are clearly identifiable. It also takes account of Standards Fund allocations, for example, for ethnic minority achievement. The second phase addresses the vast majority of the allocation of funds. Some headteachers have found it difficult to understand the effect of the changes from phase 1 to phase 2. In particular, changes in the level of funding for ethnic minority pupils have not been understood clearly by some schools.
- 35. The LEA prioritises resources appropriately toward monitoring performance and targeting support and intervention where it is most needed. The centrally retained cost of school improvement is below average compared with other unitary authorities and for England as a whole. In 2000/01, spending on statutory/regulatory duties was slightly higher than the average for unitary authorities and England averages. Strategic management costs were below unitary and national averages. The LEA has cut its spending on central administration for the current year. This cut is substantial given the volume of tasks that lie ahead for the authority.

- 36. Priorities for funding are based on sound and improving consultation with schools in relation to the funding formula, Standards Fund, New Deal for Schools and asset management plans. Consultation with wider consultative groups is underdeveloped.
- 37. Budget setting and review are satisfactory. The LEA is working under tight financial pressures. It has rigorously costed the budget pressures for 2001/02 and projected these forwards. The budget out-turn of the department for the last three years has been well within one per cent of the forecast despite the financial pressures of restructuring the LEA. School budgets are monitored and the few schools with deficits are effectively supported.

#### **Best Value**

- 38. The District Auditor, in the most recent management letter commented that the council has made a good start to Best Value, in particular in producing a very good overall Best Value Performance Plan (BVPP). Subsequently, the council has fallen behind schedule with its reviews. A single review covering catering, grounds maintenance, management information systems and finance (payments, payroll and income) was begun because of concerns about the standard of service provided. The school survey confirmed weaknesses in some of these areas. The Best Value review has not been completed. Instead, a public-private partnership for council management services for the city as a whole is being pursued.
- 39. The LEA has adopted a Best Value approach for services to schools in principle by its brokerage service, introduced in September 2000, in which there is challenge as to whether a service to schools should be provided by the LEA in the first place. It consults users of services through an annual quality survey to rate council provided services and ensures services compete in the market place. The LEA intends to compare costs and providers, but this is yet to be achieved. Some schools are finding difficulties with getting suppliers of sufficient quality and further work is required before this means of provision is working smoothly.

#### Recommendations

To increase the LEA's capacity to tackle the backlog of tasks and to enable it to address more effectively the range of issues it currently faces, it should:

 consider supplementing the senior team in the education department, at least for a limited period, to enable it to address as soon as possible the large number of social inclusion and other issues identified in this report.

#### To improve the quality of the Education Development Plan it is necessary to:

• establish a realistic and manageable set of priorities based on a new audit of local need, including addressing the standards at Key Stages 3 and 4;

- identify clear success criteria and monitor and evaluate the plan against these;
   and
- ensure that the plan links more directly with other plans, including corporate plans such as the social inclusion strategy.

#### To improve the allocation of resources to priorities it is important that:

- strategic and operational plans, including the EDP, are costed; and
- the effects of proposed changes in the LMS formula on individual schools are clearly communicated so that schools can plan to use the resources effectively.

#### **SECTION 2: SCHOOL IMPROVEMENT**

#### Implications of other functions

40. Officers and elected members have made important progress in improving the partnership with schools following a period where schools reported a lack of confidence in the LEA. Some aspects of the LEA's work with schools, such as support for literacy and numeracy have already begun to impact on standards. However, weaknesses in some corporate strategies, including the absence of a sound information technology base and a lack of clarity and coherence in some aspects of the social inclusion policy, have hindered the overall drive for improvement. Fortunately, there is a greater recognition that none of the school improvement strategies, such as support for literacy and numeracy, can be fully effective in isolation and the council is now working to create better coherence in its policies and to monitor their impact more fully.

#### Monitoring, challenge, support, intervention

- 41. The LEA's provision for monitoring, challenge, support and intervention has improved rapidly over the past year. It has few areas of major weakness and is now satisfactory overall. Early signs of its impact are evident in, for example, improvements in primary school improvement planning. However, there is still much to be done to demonstrate effectiveness in the long term.
- 42. The re-organised education department has made clear its determination to implement the national Code of Practice on LEA/School Relations and has placed important and appropriate emphasis on partnership and intervention in inverse proportion to success. The schools have received recently the LEA's helpful new framework for monitoring the performance of schools. This makes clear the criteria for monitoring and for intervention. It also clarifies expectations, roles, responsibilities and procedures, stressing rightly that schools are primarily responsible for their own improvement. A second recently published document, the LEA-schools partnership agreement, sets out effectively, over the full range of services, the responsibilities of the LEA and of the schools. It indicates success criteria and makes clear where accountability lies. The schools were consulted appropriately about these two important documents and have given them a cautious welcome.
- 43. A major re-structuring of the school improvement service has led to a smaller, but well-focused team, of advisers with strong experience of senior management in primary and secondary, although not in special, schools. The team also has sound inspection experience that it is seeking to strengthen. Every primary school receives a core allocation of one half-day visit termly from its attached school improvement adviser. The secondary schools have two visits per annum. This undifferentiated allocation within each phase is justified until the new team builds its knowledge and understanding of all the schools, but the LEA is aware of the need to keep it under review so that schools do not receive unnecessary visits.

- 44. Over the year, the visits are planned to cover a sensible balance of LEA and school needs, based on the partnership agreement and the monitoring framework. The visits result in a written record to which the adviser, the headteacher and, sometimes, the chair of governors contribute. The quality of records varies in the extent and incisiveness of judgements, but strengths and weaknesses are clearly identified and increasing use is being made of school self review.
- 45. Additional differentiated support is given, through the monitoring framework procedures, to schools causing concern or with particular needs and circumstances, such as a new headteacher. The needs of schools are identified each term through review meetings, involving all team leaders in the department, at which data are used to measure performance against framework criteria.
- 46. The extent to which primary schools have been challenged has been variable in the past but is now generally satisfactory. The LEA has not had adequate performance data or sufficient senior management experience to challenge secondary schools effectively. However, these weaknesses are now being addressed satisfactorily.
- 47. The service is clearly focused on school improvement and is well managed. The work of advisers is prioritised, monitored and reviewed effectively. Their performance targets are well linked to the EDP and the performance of the schools for which they are responsible. There are sound arrangements for continuing professional development and for the induction of new advisers. The school improvement service has a realistic view of what can be achieved by a small team. It has accepted that more could be done to share the expertise that exists within and outside the LEA and is taking appropriate steps to improve support for schools in this respect.

#### Collection and analysis of data

- 48. For primary schools, the LEA's provision of performance data and the support for their use are generally good. For secondary schools, they are poor but improvements are being made. As the LEA is tackling the weaknesses in the secondary phase vigorously, the strengths of its provision outweigh the weaknesses and it is satisfactory overall.
- 49. To support the target-setting process, the LEA provides primary schools with profiles that contain contextual information and comprehensive analyses of data, which supplement and give local colour to the data available nationally. The profiles are well presented and contain helpful guidance on the effective use of data. Arrangements have already been made to improve the data next year by the inclusion of data on finance, on exclusions, and on the performance of ethnic minority pupils and children in public care. Helpful training in the use of performance data has been provided for schools' senior managers and for governors. To date, the LEA has given very little statistical information to the secondary schools, but it is developing a common data set and is now in a position to provide a secondary school profile of similar quality to that used in the primary phase. The secondary schools are being consulted about what is needed.

50. Target-setting is the focus of the link advisers' visits to schools in the autumn term. Although there have been changes of advisers in primary schools and some variability in the quality of past practice, the target-setting process is thorough, challenging and appropriately based on the prior attainment of individual pupils. Currently, the discussion of targets for attendance and exclusions is not included but, appropriately, this is planned for next year. The LEA has identified some schools which are so effective at setting appropriate targets that it is sensibly giving thought to conducting the target-setting process by telephone in future. For secondary schools, the data have been incomplete and headteachers have not felt that the LEA has been in a position to provide effective challenge. The LEA has rightly made clear that it is not satisfied with the levels of attainment at Key Stages 3 and 4. It has strengthened both its data and its advisory expertise, and stated its intention that the targets that are shortly to be set for these two key stages will be more challenging.

#### Support for literacy

- 51. Support for literacy is good, with some strengths and few areas of weakness. Pupils' attainment at the end of Key Stage 1 improved steadily between 1995 and 2000 but remains below the national average. The proportions of pupils reaching higher grades is far lower than is found nationally. At the end of Key Stage 2, the proportion of pupils attaining Level 4 or above increased to 73 per cent in 2000, a rise of 11 per cent from 1998. This is in line with the national average and exceeded the LEA's own target by four per cent. Although aggregated school targets indicate that the 2002 target of 77 per cent is achievable, the LEA is aware that a significant improvement in boys' writing is needed.
- 52. At Key Stage 3, levels of attainment remain relatively unchanged since 1998 and are below the national average. However, at GCSE the proportion of pupils gaining a C grade or above in English increased from 32.6 per cent in 1999 to 49.3 per cent in 2000.
- 53. The EDP identifies seven well-chosen activities for literacy. They include local priorities such as the attainment of boys and sensibly highlight the need to provide support and training for primary literacy co-ordinators. The LEA is responding to some concerns among reception and year one staff by providing specific training. It is clear that over a three year period the focus of literacy support has developed as the strategy has become embedded in schools. Seven family literacy projects focus on children under eight. The EDP recognises the need to raise standards in Key Stage 3 and outlines suitable activities in line with the Key Stage 3 strategy. In line with this, the LEA is in the progress of agreeing targets for improvement with secondary schools.
- 54. The strategy is well managed. The line manager and primary consultant work closely with link advisers who monitor the implementation of the strategy in their schools. The quality of training is good and the work in schools receiving intensive support is effective. These schools have been identified using a range of appropriate criteria. Last year their average points score increased by 1.7 compared to 0.9 in other Peterborough schools.

55. A secondary adviser is to manage the work of the recently appointed Key Stage 3 consultant. Plans for the launch of the Key Stage 3 strategy are in place. Secondary teachers have been invited to attend National Literacy Strategy (NLS) training for Key Stage 2 and have had opportunities to visit leading literacy teachers. The LEA has provided support for six summer literacy schools and for subsequent 'catch-up' programmes. Schools report that these have had a positive effect on pupils' confidence.

#### **Support for numeracy**

- 56. Support for numeracy is good. By the end of Key Stage 1, 87 per cent of pupils reached the expected level of attainment in mathematics in 2000. This is below the national average with far fewer pupils attaining the higher grades than is found nationally. At the end of Key Stage 2, 68 per cent of pupils attained Level 4 or above, exceeding the LEA target by five per cent. This is below the national average, but represents a rise of 17 per cent since 1998, compared to 13 per cent nationally. The LEA is considering raising the 2002 target of 75 per cent; the aggregated schools' target is 77 per cent.
- 57. At Key Stage 3, the proportion of pupils attaining Level 5 or above has risen by six per cent since 1998 to 62 per cent. This is in line with the national average. At GCSE, 38.4 per cent of pupils gained an A\*-C grade in mathematics, an improvement of 9.5 per cent on 1998.
- 58. The EDP identifies five relevant activities for numeracy. Appropriately, there is an emphasis on improving the management of mathematics in all primary schools through support and training for co-ordinators and the inclusion of a training course for staff from Key Stage 1.
- 59. The management and implementation of the National Numeracy Strategy (NNS) are good. The line manager and two consultants work closely with link advisers. After the first year of the strategy, the line manager usefully collated school visit reports in order to identify strengths and weaknesses in implementation. The subsequent action plan reflected this analysis, for example, by the inclusion of additional training on work with measures. Clear and sensible criteria were used to identify primary schools for varying levels of support. Schools receiving intensive support from consultants increased their average point score by an average of 2.6, significantly higher than other schools.
- 60. During visits to schools, headteachers and co-ordinators commented on the enthusiasm and expertise of the numeracy team and on the help they had given to schools in analysing Key Stage 2 results.
- 61. Secondary schools have been kept up to date with the implementation of the NNS at Key Stage 2. Secondary heads of department meet regularly with one of the consultants. The LEA has provided effective support for three summer numeracy schools and related 'catch-up' programmes. Plans for the launch of the Key Stage 3 strategy are in place. A strategy of self-selection has been used to identify schools

for support during the first year of the Key Stage 3 strategy. This has limited the LEA's ability to target support where it is most needed, although all schools will receive support over two years. A secondary adviser is to manage the work of the recently appointed Key Stage 3 consultant.

#### **Support for Information and Communication Technology**

- 62. Although there have been improvements in recent months, the support for curricular ICT is poor. As the EDP acknowledges, OFSTED inspection reports show that attainment in ICT in most of Peterborough's primary schools is low and that it is a key area for improvement. Standards of attainment at Key Stage 4 are lower than those found nationally. Pupils' progress is poor in roughly half the primary schools and little good progress is made. While the progress in secondary schools is broadly in line with the national average, good progress is rare at Key Stage 4.
- 63. The support for ICT in the curriculum has developed piecemeal and the LEA lacks a coherent strategy. The schools have not been given a vision of good practice in the subject and are very critical of the LEA's provision. To a very large extent, they have made their own arrangements for support. The current draft strategy makes virtually no reference to curricular ICT and the development plan, which is intended to deal with it, has not yet been written. However, the revised EDP contains appropriate activities on which to base improvement. The LEA has accepted past failings and it took a sensible first step in appointing a consultant from one of its schools who has carried out an audit.
- 64. The post of specialist adviser for ICT was removed in the re-structuring in 2000. A co-ordinator for ICT in the curriculum is to be appointed to support schools through a service level agreement with effect from September 2001 and a training centre is being established. The emphasis of past support was on managing National Grid for Learning (NGfL) funds and supporting schools in developing ICT structures. The LEA is now making progress in implementing the audit's recommendations and some of the EDP activities. All primary schools that needed technical support have been enabled to gain it, either through joining a federation of schools or by linking with a secondary school. The LEA is on course to meet its NGfL target that all schools will have networked Internet access by 2003. All the schools have started, or have planned starting dates for. New Opportunities Fund (NOF) training and are likely to have completed it by September 2002. The consultant has trained teacher advisers to work in primary schools and subject advisers to support developments in the secondary phase but this promising initiative has not yet made an impact in all the schools visited. Electronic information exchange is currently only at the minimum level required.
- 65. Schools have appropriate schemes of work. They also have ICT development plans but the LEA has not adequately monitored their quality. The schools' ICT coordinators value their termly meetings with the consultant but, although the development of an LEA assessment scheme was an activity in the original EDP, they receive little help in assessing what pupils know, understand and can do in ICT. They also lack adequate support in developing the use of ICT across the curriculum.

#### Support for schools causing concern

- 66. The support provided by the LEA for schools causing concern is good overall. Since 1998 four schools have been made subject to special measures following OFSTED inspections. The LEA has provided effective support to all of these and two have subsequently been removed from special measures within two years. Four primary schools and one pupil referral unit (PRU) have been judged to have serious weaknesses. Again, the regime of support provided by the LEA has been instrumental in helping all the schools and two have since been judged by OFSTED to no longer have serious weaknesses. In these schools the LEA has provided an appropriate range of interventions and support including help with preparation of the action plans, training for staff and governors and the placement of additional governors to strengthen the expertise of the governing body. The LEA takes a rigorous approach to challenging under-performing teachers in these schools but has achieved a good balance between challenge and support.
- 67. The framework for monitoring school performance was distributed to all headteachers and chairs of governors in March 2001. The framework has been well received by schools and is already having a clear impact on the rigour of advisers' work with schools. It sets out suitable procedures for the identification and support of schools with weaknesses, including those designated as a cause for concern by the LEA. Currently, only one school has been placed in this latter category. The LEA has identified several that could become subject to formal concern and it is maintaining a close watching brief over these schools.
- 68. Regular school review meetings have been introduced in the last year to ensure that all teams within the department contribute to the monitoring of each school's progress, ensuring that there is early identification of difficulties. The work of the relevant teams within the department is co-ordinated well through operational group meetings led by the senior adviser. The education select panel, made up of elected members, meets twice per term to review the progress of schools causing concern and those with serious weaknesses or in special measures. The headteacher and chair of governors are invited to report their progress to the education select panel.

#### Support for governors

- 69. Until very recently the support for governors was unsatisfactory because of the weak consultation, variability of the quality of training and lack of clear strategic management. Recent improvements have remedied the most significant weaknesses, and the support is now satisfactory.
- 70. In the school survey support for governing bodies was judged significantly less positively than other LEAs surveyed. Since that time the LEA has set in place arrangements for a consultative forum with chairs of governing bodies and is seeking views on ways consultation can be improved. The flow of information is already better because of the useful and high quality newsletters which have been sent to all governors, and there is now parent governor representation on the education committee.

- 71. Inadequate take up of courses offered in the governor training programme for 1999/2000 led in September 2000 to a review of all governor training. A new and suitable programme has been produced for 2001/2002 and the LEA has provided some effective customised training programmes where requested by schools. Governors' views about the quality of governor training vary but many recognise recent improvements. A review of the induction pack issued to new governors was undertaken and a new concise pack is now in place and has been distributed to new governors since January 2001.
- 72. There are not significant numbers of vacancies for LEA nominated governors but the LEA is working well with some schools which are experiencing difficulties in recruiting governors, particularly in the parent and co-opted categories. It is anticipated that the new governor reference Group will have a key role to play in further recruitment activities.
- 73. The arrangements for supporting governors are divided between the two service branches of the LEA. Whilst there are arguments to support this division, it is not clear that this arrangement can ensure full co-ordination of all aspects of governor support. The LEA advisers do have a clear role in relation to monitoring the effectiveness of governing bodies but, at present, this element of their work is under developed.

#### Support for school management

- 74. The LEA's support for school management is satisfactory, with the strengths outweighing the weaknesses. Significant improvements have been made recently.
- 75. Evidence from OFSTED inspections shows that the quality of management in primary schools is broadly in line with the standard in similar LEAs and the nation as a whole, while secondary school management is better than that found elsewhere. However, rightly, the LEA has analysed the inspection reports for the strengths and weaknesses of management in order to prioritise its support. The schools are conscious that the new director and the re-structuring of the education department have brought a clear sense of direction and a realistic understanding of the modern LEA's role. They find the recent grouping of EDP priorities into three main areas, one of which is leadership and management, helpful.
- 76. The LEA realises the crucial role that headteachers play in raising standards and it gives high priority to supporting governors in making senior management appointments. Twenty-two of the 78 headteachers in Peterborough schools were appointed to their first headships in the past two years. The previously unsatisfactory induction arrangements for new heads have been improved. Every new headteacher now receives up to six additional days of support from the school improvement service and the LEA holds meetings twice termly for the group of heads who were appointed in the past two years.
- 77. Headteachers meet regularly with the director and are encouraged that she and all the school improvement advisers have recent senior management experience. In particular, the LEA's ability to support management in secondary schools has

improved from a previously unsatisfactory situation. The advisers' knowledge of the schools is currently incomplete but their work has been well targeted on school improvement planning and review. The three secondary schools in challenging circumstances have been given effective help in constructing their action plans. The OFSTED self-evaluation course for senior managers, arranged by the LEA and delivered by an external provider, was very well received by the schools and over 90 per cent of headteachers have completed this training. Participation in the National Professional Qualification for Headship (NPQH) and the Leadership Programme for Serving Headteachers (LPSH) is actively encouraged and the response has been good. A pilot group of schools is also working to achieve the Basic Skills Quality Mark.

- 78. Appropriately, the LEA has identified middle management as a key area for school improvement and has taken several positive steps. The middle management training piloted by the LEA in the three schools in challenging circumstances has received a positive response and led to further developments. A programme of middle management training is now being brokered with an external provider.
- 79. The programme of continuing professional development, provided by the LEA and other agencies, has good take-up and receives largely positive evaluations. The LEA encourages schools to use a range of providers and has produced a booklet that gives details of accredited advisers for a range of subjects and aspects. However, schools' take-up of these advisers' support has been limited. The LEA is beginning to make effective use of the expertise available locally, for example in the Beacon and specialist schools. A helpful booklet of information about the support available from the Advanced Skills Teachers in Peterborough has been issued to schools. However, the LEA is aware that there is more to be done to support schools through the dissemination of good practice.
- 80. The LEA has a good strategy for the recruitment and retention of teachers and its provision for those who are newly qualified is sound.

#### Support for early years education

- 81. The LEA's support for early years education is good. A commitment to working with providers to increase provision, ensure quality and raise standards is included within the Best Value Performance Plan and in EDP priority 8. The LEA has made a significant contribution to the early years development and childcare partnership (EYDCP) and has promoted effective co-operation across a range of providers.
- 82. The EYDCP meets all requirements. Links to other plans, such as the EDP, the Children's services plan and the Quality Protects action plan are clear and supportive. The LEA and the EYDCP are effectively supporting the work of the Sure Start initiative. This aims to improve access to information and services for families in an area which ranks highly in terms of deprivation and which has a large ethnic minority population.
- 83. The LEA and EYDCP have fulfilled their duty to provide sufficient places for all four-year-olds and are on course to reach their target for places for three-year-olds

- by 2004. Currently, places for three-year-olds are targeted at those most in need. In nursery classes, and in the one nursery school, an identified number of places are reserved for children with special educational needs. To support these children the LEA allocates additional learning support assistant hours.
- 84. The partnership monitors all OFSTED inspection reports and uses the outcomes to target the work of three support teachers. Evidence from the LEA and from inspection reports shows that this support has had a positive impact on the quality of education provided. The partnership has established good links with Penn Green Early Excellence Centre enabling early years' practitioners to develop their work with parents. The LEA and the Partnership are providing good support for the authority's only nursery school in its bid to become an early excellence centre.
- 85. The partnership provides a significant amount of good quality training opportunities for Foundation Stage practitioners and Special Educational Needs Coordinators (SENCOs). However, some practitioners remain confused about the implementation of the Foundation Stage and the requirements of the National Literacy and Numeracy Strategies at Key Stage 1. The partnership directory of providers is accessible, informative and regularly updated.

#### **Support for 14-19 education**

- 86. The LEA is keeping abreast of 14-19 developments. It facilitates, advises and supports, and it plans to build on the various initiatives to produce a coherent strategy when its other priorities allow. For an LEA which, in many respects, is making a fresh start, this is a satisfactory position.
- 87. The LEA contributes to the Peterborough learning partnership (PLP), which includes a 14-19 task group that will consider, among other issues, work with disaffected pupils. The PLP has: co-ordinated the preparation of a draft strategy; commissioned a survey into young people's attitudes, needs, experiences and expectations of secondary education; and supported the development of a post-16 federation of the six community secondary schools. The federation is an example of the co-operative arrangements that all the schools with small sixth forms have made to provide students with greater choice, more economically.
- 88. In the autumn and spring terms of 1999/2000, a headteacher carried out a project on developing 14-19 education in Peterborough. Its conclusion was that the LEA needed to develop, through the PLP, a strategic policy framework that would encourage collaboration. The LEA's strategy for raising attainment at Key Stage 3 provides an important platform for the development of a 14-19 strategy.

#### Recommendations

In order to improve the support for ICT in the curriculum, it will be necessary to:

develop, communicate and implement a fully coherent strategy; and

•	provide effective progress in ICT.	support	to	schools	for	assessing	pupils'	attainment	and

#### **SECTION 3: STRATEGIC MANAGEMENT**

#### Corporate planning

- 89. Corporate planning has some developing strengths, for example in relation to partnerships with other agencies, and members and the chief executive are increasingly providing clearer leadership and vision. However, the links between corporate intentions in areas such as city regeneration and tackling social exclusion, and departmental plans are insufficiently developed. Monitoring the contribution of plans such as the EDP to wider corporate objectives is unsatisfactory.
- 90. The current Best Value Performance Plan expresses the council's most recent public statements about its aspirations. This provides the necessary foundations for departmental planning in terms of the vision and six community priorities, but the council now recognises that it fails to provide a full articulation of important aspects such as reducing social exclusion. Significantly, it does not provide a sufficiently robust basis for routine operational management leading to delivery of the vision at departmental level. As a result, although much is being done in individual departments, including education, which addresses established corporate priorities, some responses lack sufficient focus and coherence. Examples of this include work with ethnic minority pupils and support for pupils with no school place.
- 91. Importantly, there has been insufficient monitoring or evaluation of success. In education, while there has been monitoring of progress against statutory targets in the EDP, there has been little attempt to assess the relevance of its detailed intentions against those of the wider council and insufficient rigour has been applied to analysis of the outcomes.
- 92. To help address these weaknesses a draft corporate strategy document, the 'Interim Corporate Strategy', has been produced. This sets out more effectively the core intentions of the council in a form which will enable departmental management plans and performance management arrangements to be more securely linked to wider corporate intentions. Improved monitoring and evaluation are essential elements of this and are already beginning to be developed. The detail contained within the recent action plan for the Greater Peterborough Partnership, for example, now shows that more effort is successfully being put into ensuring greater coherence between plans and that monitoring and evaluation of outcomes are being afforded proper significance.

#### Partnership with other agencies and local government departments

- 93. Partnership with other agencies and departments is at least satisfactory at the senior levels, but some operational links between education and social services at school level are accepted as having weaknesses.
- 94. Weekly meetings of all directors with the chief executive enable all departments to be aware of each other's work and they are increasingly effective in encouraging coherence in approaches to cross cutting work. Beyond the local authority, there is evidence of good relationships with health and the police. The new Peterborough

Health Partnership with representatives from the council, hospitals and primary care is seeking to extend collaborative arrangements and already making use of freedoms under new health legislation to resolve issues related to provision of speech therapy. The youth offending team has good, strong links with education, and has had an assigned teacher for many years. The near co-terminous boundaries of the police and the local authority enable focused approaches to common issues such as drugs awareness.

- 95. There are examples of productive work between LEA schools and the local college, for example on work with disaffected pupils. The director of education is on the local Learning Skills Council and there is a clear commitment to full partnership between the two agencies.
- 96. Results from the schools' survey and visits to schools during the inspection highlight some tensions at the operational level, particularly between schools and social services. Some anxieties surround perceptions about changes in child protection procedures, but more generally some schools are concerned about problems of communication with social services personnel and about the shortage of social service support.

#### **Management services**

- 97. Management services are satisfactory overall but there are weaknesses in support for ICT in school administration and grounds maintenance. The authority is active in brokering services for schools but outcomes are not always satisfactory.
- 98. Support for schools in the procurement of services is generally satisfactory. There are, however, variations in the quality of services received by schools and a history of weak quality control. Nevertheless, schools report improvement in the quality of services during the past year. The LEA has introduced a brokerage service which gives choice of provider in the supply of services. For each service there are alternatives to those provided by the council. The LEA aims to create a genuine market which allows schools to achieve best value from purchasing decisions. The brokerage service was partly born from concerns about the quality of services provided to schools. Choice and competition has, in many instances, led to improved services. For larger establishments and where a group of schools has made co-operative arrangements, the approach works well. However, there are difficulties in securing good services in some areas which have been burdensome for some headteachers.
- 99. The LEA provides a folder of services for schools in which service standards are specified. It surveys schools to assess the quality of services and a consultative group of headteachers helps to judge which providers qualify for inclusion in the folder. Model service level agreements are provided and schools have choice in the range, levels and packaging of support services. Where, for example, small schools need help in procuring a service, the LEA provides help. Most schools report they have received good advice. The LEA is increasingly successful in attracting a range of providers to achieve the competition it seeks. There are difficulties, however, in ensuring that services are truly comparable on the basis of price because the

services offered contain different features. Plans are in place to help schools draw up specifications which enable tenders to be compared fairly.

- 100. Financial services are satisfactory overall. Schools have access to sound financial advice and training which is purchased according to need. Financial advice is appropriately separated from the LEA's financial monitoring function. Payroll services are increasingly being purchased independently, but schools using the LEA service are broadly satisfied. The service of internal audit is thorough and comprehensive except for the monitoring of SEN expenditure.
- 101. Personnel services are provided mainly by one independent provider and are of good quality. There are effective strategic links with the LEA's central personnel but less effective links with payroll services. Schools rate highly the support for personnel advice, guidance and administration. Casework such as help with capability procedures is often good.
- 102. ICT support for school management is unsatisfactory. The LEA has no overall planned strategy for ICT and improvements in support for ICT at a corporate level are needed to ensure an effective information and communications infrastructure. Support for primary and special school administrative systems is broadly satisfactory. LEA support for secondary school administration is poor. Secondary schools are not sufficiently linked to LEA information management systems and the use of three different information management systems in the secondary sector militates against coherence. The LEA has a long way to go to gain the confidence of secondary schools in its ICT strategy. However, the LEA has budgeted to improve links with schools.
- 103. Technical advice and support for the curriculum and administration are largely separated. Support for administration is provided by the council but the administrative system used by most secondary schools is not supported. Curriculum support is offered via one of the secondary schools but in practice it is from a range of providers. The separation of curriculum and administrative support causes duplication of effort and limits the prospects for linking curriculum and administrative systems in schools. It is particularly important to achieve such links in order to enable school staff to use ICT for assessment.
- 104. The quality of technical advice and support is too variable. In the school survey, the quality of support for ICT in school administration was judged by over a quarter of primary schools and by all but one secondary school to be poor. In contrast, a recent survey of those receiving this service in the Best Value review of ICT services judged technical support provided by Peterborough council to be largely satisfactory or better. This contrast in views arises partly because of the cost and partly because of the weak engagement with secondary schools.
- 105. Electronic information management is satisfactory overall. However, it is under-developed with secondary schools. Sound progress has been made with the common pupil data-set. Satisfactory steps forward have been made with Peterborough's ICT administration system (PIES) and with electronic data transfer, largely with the primary sector. This is providing the LEA with the potential to use data to aid strategic planning and the monitoring of provision. Timely developments

have recently been made in producing pupil performance data in relation to pupils' additional needs. Through the use of electronic data transfer, the LEA has targeted a reduction in the burdens placed on schools through collecting information. It has a 'Star Chamber' to scrutinise information requests with the aim of reducing the volume of data collected.

106. Contract services are provided for catering, cleaning and grounds. These services are operating in a strong market place. Council services compete with a neighbouring LEA and the private sector. The LEA provides cleaning services to 41 of the 76 schools. The quality of cleaning is rated well by schools. Some schools prefer to arrange their own cleaning or to employ their own cleaners. Grounds maintenance contractors have operated in competition since 1999. One is the LEA service, another being Cambridgeshire and there is also a range of private contractors. The quality of service for grounds maintenance has improved from a situation of much dissatisfaction. It is not yet satisfactory overall but competition is leading to improvement. Two main providers provide catering services to schools. The vast majority of schools judge that a satisfactory service is provided.

107. Home to school transport is managed by the council. A good service is provided. Costs have risen as with other authorities but the service is very cost conscious and is rationalising SEN transport. There is good liaison with schools and a code of conduct for pupils.

#### Recommendations

To ensure that the education department has a central role in the council's community strategies for addressing city regeneration, raising standards and tackling social exclusion, it is necessary for the council to:

- improve the co-ordination between the council's corporate aims and departmental strategies and planning, including the Education Development Plan; and
- monitor more rigorously the contribution of departments such as education to corporate objectives.

#### In order to improve the brokering of services:

- networking arrangements should be further developed for clusters of schools to secure cost effective and reliable services, particularly for small schools;
   and
- the interests of schools should be represented in brokering and monitoring management services to ensure high quality at reasonable cost.

In order to improve ICT for school administration and management and provide the basis for a more effective electronic information and communication infrastructure:



#### **SECTION 4: SPECIAL EDUCATION PROVISION**

#### Strategy

- 108. The LEA has recently completed a special needs strategy document, which has been sent out to schools for consultation. The strategy is sound and it is based on the EDP priorities. It extends each priority appropriately to focus specifically on provision for pupils with Special Educational Needs (SEN).
- 109. The development of inclusive education for pupils with SEN is well advanced in some respects. The authority has worked with mainstream schools to provide teachers and support assistants with the necessary skills, thus ensuring that the majority of pupils with special educational needs can be appropriately placed in their local school. The special schools have informal links with local schools but there is insufficient use of the expertise available in the special schools to support inclusion in mainstream schools.
- 110. Appropriate provision is made for pupils with hearing and visual impairment. The provision of special resource facilities allows for inclusion in mainstream classes and additional support as required. The LEA is aware of the need for additional training for teachers and support assistants in such areas as autism. Support is provided from prior to the admission of a child with such identified needs. Where the specialist trainers are not available, the LEA is prepared to purchase expertise.
- 111. As part of its overall strategic approach for SEN the LEA initiated a review of special needs provision. The review has been slow to make progress but is now being addressed with more commitment and it is out for consultation. The four special schools feel fully involved and consulted about the proposed changes. Although the review is taking place, the LEA is to open a new school in September 2001 for secondary age pupils with emotional and behavioural difficulties (EBD). This will ensure that pupils placed temporarily in alternative provision will have access to full-time education. At present, some schools are concerned about the difficulties in obtaining suitable provision for pupils with EBD. In making provision for pupils with SEN, the authority has significantly decreased the number of pupils in out-of-city placements. Pupils in established places are being supported but new referrals are placed, where possible, in the authority's schools.
- 112. The LEA has strengthened its links with parents through the appointment of a parent partnership officer and the setting up of a help-line and website. A named person is established to help families through the procedures leading to a statement of SEN.

#### Statutory obligations

113. The LEA is taking effective steps to meet its statutory obligations and in excess of 90 per cent of statements are issued within the set timescale. This figure compares well with many LEAs, although it includes 16 per cent statutory exceptions where the statement is delayed. Additional strategies for monitoring the reasons for

the exceptions are not yet in place to encourage all agencies to respond promptly. The quality of those statements seen is satisfactory, providing sufficient information and targets to support the schools in structuring individual education plans.

- 114. Parent preferences are taken into account when places are selected for their children and the LEA facilitates tribunals as required. The relatively small number of appeals to tribunals reflects the general level of parental satisfaction. The parent partnership officer plays a significant part in mediating and in acting as a parental advocate.
- 115. For pupils who have a statement of SEN, the annual and transitional reviews are generally conducted on time. The LEA is represented by the assessment and review officers and by other officers if requested.
- 116. The LEA has an effective pre-school service which includes, health personnel, educational psychologists, pre-school officers and other members of the early years partnership. The portage service supports children with identified special needs. The early identification of such needs is a strength of the LEA.

#### Improvement and value for money

- 117. The number of pupils identified on school SEN registers is high in many schools, and this is associated with the relatively low level of achievement identified on admission through baseline assessment. Support to schools is generally well received and effective. However, because of the size of the LEA, and high delegation of funds to schools, there are restrictions on the expertise available to the LEA. The limited resources are deployed in extending the skills of school staff as well as in working with pupils. The LEA's learning support service is providing satisfactory support to about 47 per cent of schools who have purchased the service from their delegated budget. The quality of support provided to schools by the hearing and visual impairment services is good. It is readily accessible and sufficient to meet pupils' needs. The lack of behaviour support is a significant weakness which schools are quick to identify.
- 118. The educational psychology service is mostly well regarded. The lack of an SEN adviser results in extensive demands on the psychologists' time for a wide service of advice and guidance, including curriculum issues. The leader of the service works closely with the special needs officer and there is evidence of recent progress in developing the strategy and moving the review of special schools forward.
- 119. The support for Special Educational Needs Co-ordinators (SENCOs) is developing. Cluster groups have been formed, which are supported by the LEA. Training is being developed for learning support assistants and the provision of training for reception teachers prior to the admission of a pupil with significant special educational needs is a positive development.
- 120. The level of funding for SEN is well above average. Total SEN expenditure and the funding for pupils with statements is high. The LEA has delegated a greater

percentage of the SEN budget to schools in this academic year but no system for auditing how the schools use the money has been set in place. This is a weakness and prevents the LEA forming a clear view about the value for money it provides in relation to support for pupils with SEN. This is unsatisfactory.

#### Recommendations

In order to provide better support for pupils with special educational needs and to demonstrate value for money:

- schools dealing with high levels of behaviour difficulties need further advice or support about appropriate strategies;
- a system for auditing the impact of delegated funds needs to be established; and
- additional curriculum support for special schools needs to be provided or brokered.

#### **SECTION 5: ACCESS**

#### The supply of school places

- 121. The LEA has a complex situation to manage with school places but strategic planning for school organisation in the longer term has been unsatisfactory. The LEA has a good track record of accurately forecasting numbers and capacity data is maintained up to date. The number of primary school places needed is falling owing to the maturing of the city population. At the same time, more secondary school places are needed. There are 11 per cent surplus places in primary schools and eight per cent in secondary schools. Nine primary schools and three secondary schools have more than 25 per cent surplus places. Of the secondary schools with high surplus places, two have sixth forms of fewer than 100 places. Two are projected to have fewer pupils over the next five years, even though there is overall growth in secondary school numbers. Close to a third of secondary schools have fewer than 700 pupils on roll and almost a half of secondary schools have small sixth forms. The first preferences made by parents paint a picture of schools of contrasting popularity.
- 122. The school organisation plan does not adequately set out conclusions on the need to add or remove school places in specific areas of the authority and plans to reduce surplus capacity are inadequate. The potential impact of the planned new schools in Hampton and Woodstone on school places more widely in Peterborough is now being considered in detail. However, with the wide range of school place issues to be tackled, a plan with desired outcomes, actions, time-scales and processes is much needed but absent. While the most recent plan identifies broad intentions for a range of reviews in appropriate areas it falls short of providing a coherent overall plan.
- 123. The LEA funds more special school places than are needed. A special school review is now underway after a slow start. A new EBD school is being built. The lack of special EBD places has caused difficulties, but this will be resolved in September. There is presently insufficient provision for children excluded from school and inadequate planning to address this issue. Some pupils remain without a school place for too long.
- 124. The infant class size plan has been implemented well. It met the target of infant classes below 30 by 2001. There remain some mixed age classes, although some standard numbers have been changed to reduce these. Under-fives planning is sensibly co-ordinated with the early years education and childcare development plan. Spare places in primary schools are to be tackled in part by creating nursery provision for under-fives.

#### Asset management planning

125. Asset management planning is satisfactory. The LEA is making good progress in ensuring that capital funding is appropriately targeted and that existing assets are maintained and improved according to need.

- 126. The LEA has met all government requirements. Surveys have been completed to provide schools and the LEA with an accurate assessment of building condition issues. Schools are provided with surveys and funding priorities. The LEA survey of suitability is complete. A good level of investment is planned to address improvements. In order to ensure fairness in determining priorities, a steering group is to be established. This was to be set up by March 2001 but has not yet been constituted. It will enable the questions raised by schools about asset management plans and the process of resource allocation to be addressed. Most schools have found the quality of asset management planning to be at least satisfactory and sometimes good although some secondary schools judge it to be poor. The asset management plan is effectively linked to school development planning and to infant class size planning.
- 127. The current level of investment in buildings is effectively matched to need. The LEA has secured £21.5m from the DfES for school developments. In 2000/2001, capital expenditure was above the average for statistical neighbours and unitary authorities.
- 128. Overall, support to schools for building maintenance is satisfactory. Schools have access to technical support and property services at a level to suit their needs

#### **Admissions**

- 129. Admissions arrangements are satisfactory and good progress has been made with the admissions forums. The LEA's admissions service administers the process for all admission authorities in the LEA. The LEA's admission arrangements for 2002 were conducted appropriately against clear and objective criteria. These criteria give parents the maximum chance of having their first preference met, whilst supporting enrolment at local schools.
- 130. LEA admission procedures are good. Parents are provided with clear and helpful information in plain English. The secondary school information is available in the most used community language and the primary information will be available for the first time this year. The time-scales for each stage of the admissions process are suitable, so that parents are informed of a school place in the first few days of February. Appeals are largely resolved by the summer half-term break. Procedures for appeals are satisfactory. In the current year there are 167 appeals overall, the same as last year. The admissions process is administered thoroughly. The pattern of admissions is monitored by the LEA and is effectively linked to the infant class size plan.
- 131. There is an admissions forum for each of the primary and secondary phases. The primary admission forum has been active in improving admissions processes for example, by developing a system to reduce mobility through casual admissions and setting up a system for reserve lists.
- 132. The prospects for the secondary admission forum are improving. The secondary admissions forum brings together eight admission authorities. There have been historic tensions between some admission authorities, but a growing will

among headteachers to overcome the issues dividing schools is evident. The LEA is taking an active role in achieving this. A partnership agreement is in place to clarify roles and responsibilities. The LEA is currently challenging admission criteria for two schools, which are believed to be outside the Code of Practice. The LEA and secondary heads have set up a panel to try to ensure that sufficient places are available for the readmission of excluded pupils.

#### Provision of education otherwise than at school

- 133. Support for pupils out of school is poor. The current LEA strategy is weak and does not secure a viable educational entitlement for children who require education other than at school. However, the LEA is aware of the situation and has satisfactory plans for improvement.
- 134. The LEA provides education for pupils without a school place at the pupil referral unit, at home and in a small number of alternative venues across the city. The link programme provides an alternative curriculum for pupils in Key Stage 4, involving local colleges and training services. Provision is poor with 55 per cent of these pupils receiving less than ten hours tuition, and many receiving only four hours. Pupils from a closed EBD school now occupy many of the places at the pupil referral unit and as a result the unit cannot operate its intended 'revolving door' policy.
- 135. The OFSTED inspection report on the pupil referral unit criticised many aspects of the LEA's management. An appropriate action plan is being implemented to address these shortcomings. Provision for pregnant schoolgirls and teenage mothers, and tuition in alternative venues, were not inspected and are not subject to external quality control. This is unacceptable.
- 136. The majority of pupils requiring education other than at school are either permanently excluded or dual registered with a school, but there is a small number whose status in unclear, for example, at least one pupil had been removed from a school's roll without being permanently excluded. The review of the behaviour support plan acknowledges that a variety of unofficial exclusions still occur. This is also unacceptable.
- 137. The LEA recognises that the information it holds on pupils without a school place is incomplete. The current database does not hold sufficient relevant information to enable easy tracking of the progress of individual pupils or an analysis of trends. Furthermore, the LEA is now aware that the database it had been planning to adopt will not fulfil these functions.
- 138. The LEA has outlined an appropriate strategy for providing, by 2002, full time education for pupils excluded from school. There is a costed plan but it is too recent for its status to be secure. The main element in the strategy is a reduction in the number of pupils excluded. The new special school for Key Stage 3/4 pupils with emotional and behavioural difficulties, and the associated unit for Key Stage 2 pupils, will provide outreach support for pupils with statements of special educational needs remaining in mainstream schools. Some £900,000 of Standards Fund will be

devolved to schools in order that they can make appropriate provision for pupils at risk of exclusion. All secondary schools have agreed to take part in a pilot project in which a panel of headteachers and officers, the pupil at risk panel (PARP), considers cases either of permanent exclusion or where a pastoral support programme is under pressure. The panel is trialling a protocol that sensibly seeks to ensure that sufficient places are available for the re-admission of permanently excluded pupils.

139. The LEA has sound procedures in place for monitoring the education provided for pupils whose parents choose to educate them at home. Spending on education otherwise than at school is above the national average, and above the averages of both the LEA's statistical neighbours and other unitary authorities. This represents poor value for money.

#### **Attendance**

- 140. Support for attendance is satisfactory: strengths outweigh weaknesses. Levels of attendance in Peterborough have improved steadily in the last five years in both primary and secondary schools and are now in line with national averages. Unauthorised absence is in line with the national average in secondary schools. However, in primary schools the level of unauthorised absence increased slightly in 2000 and is above the national average. The LEA has fallen behind its original, challenging target to reduce unauthorised absence in primary schools.
- 141. The LEA has outlined in the current EDP a coherent strategy for improving attendance and reducing unauthorised absence. However, at the time of the inspection, these measures had either not been fully implemented or had not been in place long enough to impact significantly on schools.
- 142. The strategy for improvement sensibly includes the use of clear and increasingly specific criteria to differentiate further the amount of support allocated to schools by the education welfare service (EWS). The LEA intends to continue to work with other agencies to reduce truancy and poor attendance. Termly collection and analysis of data will support schools in setting targets for improvement. The LEA has recognised the need to improve significantly the EWS's database and integrate it into the local authority's database. This will enable other services to be aware of concerns about attendance at school and pupil level.
- 143. The LEA recently provided appropriate and succinct guidance to schools on improving attendance and reducing unauthorised absence, which stresses the link between attendance and attainment. The respective responsibilities of the EWS and schools are clearly identified in the LEA school partnership agreement of March 2001. The quality of service provided by the EWS is inconsistent: some schools praised the work of individual officers but in some other schools officers are insufficiently pro-active and slow to respond to requests for support.
- 144. Co-operation with other agencies such as the police and NCH Action for Children is satisfactory and improving. The planned youth inclusion project will use Home Office funding to target 13-15 year olds with poor levels of attendance and behaviour in one of the most deprived areas of the city. The EWS is increasingly

aware of, and supporting, school based initiatives and is consequently able to disseminate examples of effective practice. One primary school, which has been awarded a 'Truancy Buster Award' by the DfES, provided a display at the recent social inclusion conference. Some secondary schools visited during the inspection are appropriately using their Pupil Retention Grant to improve levels of attendance. Expenditure on the EWS, which is above the national average, provides satisfactory value for money.

#### **Behaviour support**

- 145. The LEA's behaviour support is currently unsatisfactory. The number of permanent exclusions in Peterborough schools is falling and the LEA is well ahead of its target. However, in OFSTED inspections, the quality of the schools' climate in primary schools, including attitudes and behaviour, compares unfavourably with that in similar LEAs and the nation as a whole.
- 146. The current approach to behaviour support is a range of separate, largely appropriate, initiatives. Five primary schools benefit from nurture groups for children with emotional or behavioural problems, financed from the Standards Fund, but this support is not available to other schools with pupils who would benefit. Another Standards Fund project has established social inclusion groups in ten primary schools. There is no evidence to demonstrate the project's success in improving attendance, but the two project schools visited in this inspection had markedly reduced exclusions. Project staff have also provided effective advice and support to about thirty other schools. In collaboration with a specialist centre intensive support is provided for the most challenging children, but places are in short supply and the problem of re-integration has not been resolved satisfactorily. In a pilot project, a panel of headteachers and officers (PARP) is having some success in finding alternative provision for secondary school pupils at risk of exclusion and consideration is being given to the establishment of a similar panel for the primary phase. Alternative curricula are being developed for disaffected Key Stage 4 pupils. The LEA also collaborates with the YMCA on a strategic support project, provides full-time educational provision in a secure unit and seconds a support teacher to the youth offending team.
- 147. However, there is a lack of coherence about current provision and it is unclear who manages the overall approach. The schools are highly critical. Frequently, in difficult circumstances, they do not know whom to ask for advice. The LEA has delegated funds for behaviour support to schools but the LEA does not monitor its use or impact. In practice, schools purchase support from outside agencies or from former members of the LEA's disbanded behaviour support service. The LEA does not sufficiently disseminate the good practice in behaviour management that exists in some schools.
- 148. The LEA's new strategy is set out in the revised EDP and in the revised behaviour support plan, which is an operational plan for the EDP and other relevant LEA documents. The strategy represents a co-ordinated and strongly inclusive approach. The current provision is to be enhanced by a new 55-place school for pupils with emotional and behavioural difficulties, which will open in autumn 2001. It

is intended to be the core of the new behaviour support service, providing creative programmes for pupils and outreach support to mainstream schools. The headteacher of this school will manage all out-of-school provision, social inclusion projects and behavioural support in the LEA, including a new Key Stage 2 centre attached to a primary school and providing both teaching on site and outreach support. The LEA has acknowledged the challenging responsibility of this role by enhancing the deputy head's responsibilities and developing a protocol for working with the primary school at which the Key Stage 2 centre will be based.

#### Health, safety, welfare and child protection

- 149. The LEA takes reasonable steps to meet its statutory obligations to protect children from significant harm. There is a designated officer for child protection who is a member of the area child protection committee. The LEA has a service level agreement with an independent provider for advice to schools on child protection issues and the training and support of designated persons and governors. In the school survey 94 per cent of schools judged advice on child protection to be satisfactory or better. However, the effectiveness of liaison with social services was judged to be unsatisfactory or worse by 57 per cent of the primary schools and all the secondary schools. Communication between education and social services is not always effective at school level owing to frequent changes in social services personnel. During the inspection, schools raised concerns about recent, conflicting advice from within social services about referral procedures. Briefing sessions for headteachers and designated persons, attended by team managers from social services were taking place at the time of the inspection.
- 150. Health and safety provision by Peterborough city council is positive and proactive. The LEA takes reasonable steps to meet its statutory responsibilities. The health and safety policy is clear and detailed. Schools receive good guidance on the management of emergencies in schools, security and general health and safety issues. There is a programme of regular audits of schools, followed by the monitoring of action plans. Accident statistics are analysed to monitor trends.

#### Support for children in public care

- 151. Support for children in public care is satisfactory; strengths outweigh weaknesses. The council has taken corporate responsibility to promote the educational achievement of children in care. This is recognised in all relevant corporate and departmental plans, and in the EYCDP plan. However, the support available from social services at school level is inconsistent.
- 152. Reports on the attainment of children in public care have been discussed by elected members. In 2000, the percentage leaving school with at least one GCSE was 67 per cent, in line with LEA targets. Appropriate targets for improvement in attainment are in place at each key stage. A sound strategy for improvement has been identified and is now being implemented.

- 153. A senior education officer has been appointed to sustain and extend cooperation with social services. However, plans to amalgamate teams from the social services and education departments have been delayed by difficulties in locating premises and the reorganisation of the social services department. Furthermore, plans to establish a joint database are behind schedule, although the LEA knows who the children in public care are. Current arrangements significantly hamper the sharing of information and the monitoring, tracking and analysis of children's educational achievement. Schools report that support from social services for individual children is difficult to access even when the child is at risk of exclusion.
- 154. Additional classroom support is available to schools where the behaviour of a child in public care is causing concern. Schools report that this support is crucial in preventing exclusions. Further support is available to pupils before public examinations. Referral systems for educational support for individual children are not fully understood by all schools. Appropriate training and support is provided for designated teachers. Local education authority guidance on the formulation of personal education plans is sound and helpful. There is a training programme for foster carers and a project to make ICT available to children in community and foster homes.

#### Provision for gifted and talented pupils

- 155. The LEA satisfactorily facilitates, advises and supports a variety of school-initiated activities for gifted and talented pupils. The work is co-ordinated by the senior school improvement adviser. The development of teaching and learning for gifted and talented pupils is included in priority 1 of the EDP. The LEA supports this development by highlighting and facilitating the work of groups of schools that are focusing on curriculum development and provision for gifted and talented pupils.
- 156. Two summer schools were held in 2000 and the LEA's evaluation indicates that one was more successful than the other. This year, the gifted and talented summer schools will continue in schools chosen by headteachers. The three Beacon secondary schools hold termly gifted and talented workshops for the coordinators in all the secondary schools and the Beacon primary school. They have also planned Year 6 workshops for June 2001 and a gifted and talented conference to take place in September. The educational psychology service has provided a course on working with very able children, which received positive evaluations.
- 157. The LEA has identified schools in advantaged areas that need support with provision for gifted and talented pupils, but it has yet to do so in other areas. The data on the performance of gifted and talented pupils are not co-ordinated, although the LEA states that attached advisers are able to identify pupils in individual schools. The LEA acknowledges the need to publish a clear strategy when other priorities allow.

#### Support for pupils of ethnic minority heritage, including Travellers

- 158. Although some work in individual schools is satisfactory, support provided by the LEA for ethnic minority children, including Travellers, is unsatisfactory overall.
- 159. The LEA has been slow to provide comparative data on the achievement of pupils from ethnic minority groups. This has limited the LEA's and schools' ability to set challenging targets for improvement. The LEA has recently, for the first time, collected and analysed attainment data for ethnic minority groups based on National Curriculum test results, although this analysis has not yet been sent to schools. The data show that, for example, there is relative underachievement by pupils of Pakistani heritage, a group which represents over half the ethnic minority population in schools.
- 160. Work is now in hand to produce guidance on raising attainment of pupils from ethnic minority groups and there have been some useful individual initiatives, including guidance on supporting bilingual pupils in the literacy hour. Until recently, however, there has been limited expertise at a senior level in this area. The new appointment of an adviser with combined responsibility for ethnic minorities and literacy has the potential to improve the situation, but it is too early to gauge the impact of this post or whether the responsibilities are too broad.
- 161. Delegation of Ethnic Minority Achievement Grant (EMAG) funds to schools has depleted the LEA's capacity to provide effective support. Very little money is retained by the LEA for advice and continuing professional development activities. In addition, a recent change in the LMS funding arrangements, although benefiting some schools, has raised concerns in other schools with a high proportion of pupils from ethnic minority backgrounds. The minority ethnic population is heavily concentrated in certain wards: in two inner city primary schools it constitutes over 98 per cent of the school rolls. Schools in these areas are now questioning whether they will be able to maintain their existing intensive level of support specifically for English as an additional language needs.
- 162. The Travellers' education service provides both peripatetic and long term support to Traveller children in the authority. The service was originally part of a larger service with another authority. This support is welcomed by most schools but the arrangements for oversight of the service have been poor and there has been too little evaluation of its impact, except in terms of attendance rates.

#### Social exclusion

- 163. The council has made a positive commitment to reducing social exclusion and it is making sound progress on various strands of its policy. In education this progress is best demonstrated in relation to the inclusion of pupils with SEN in mainstream schools which is satisfactory. There has been, however, insufficient overall coherence of the various strands at the corporate level and within education, though this is now being addressed more directly.
- 164. The council's commitment to social inclusion is articulated in its corporate plans including the Best Value Performance Plan. A social inclusion strategy was

produced in January 2000, which set out a definition of social exclusion and what the council's response was to be. This was mainly related to deployment of Single Regeneration Budget (SRB) funds to tackle five themes around poverty and deprivation in the most disadvantaged areas of the authority. Within this the social inclusion project, initiated in 14 schools, has had some success.

- 165. The EDP rightly addresses the need to improve standards of attainment of underachieving pupils as one of its priorities. Within this context it identifies actions related to looked-after children, excluded pupils, pre-school children and pupils from ethnic minority backgrounds. It is clear from various sections of this report that the LEA has been successful in some of these activities which relate to social exclusion, but not in all. It is not clear, however, how these groups and not others came to be identified within the wider council's definition. Importantly, neither the council nor the education department has established the qualitative or quantitative contribution of these initiatives to its own inclusion strategy.
- 166. To address this within the area of education and lifelong learning, the education department has set up an inclusion working group containing senior officers from the different services. The group has already agreed a basic vision statement, aims, initial tasks and terms of reference and this group will be seeking to refine the outline inclusion strategy, improve the coherence of activities within the department and also relate these more directly to the developing corporate policies. This is a positive development which has the potential to address the weaknesses in this area, though much remains to be done.

#### Combating racism

- 167. There is no evidence to suggest that racism is more pronounced in Peterborough schools than elsewhere. However, the LEA has been slow to take decisive action to monitor and combat racism where it does occur. This is unsatisfactory. It has now begun to address the issue.
- 168. Guidelines for reporting racist incidents have been drafted and are out for consultation. Some schools are aware of these and some already routinely monitor racist incidents, although not all report them to the LEA. The city council is taking a proactive part to develop the Peterborough equality action plan in collaboration with the Peterborough Partnership Against Racial Harassment. The council has recently completed its own audit of the ethnic mix of its staff, including teaching staff and this will form part of work to promote equalities. A draft revised equalities policy was agreed by elected members in February 2001.

#### Recommendations

#### To improve aspects of access it will be necessary to:

• improve the provision of school places by setting out an overall school organisation plan with time-scales and actions for secondary school organisation,

- secondary school sixth forms, special school places and organisation, and removal of surplus places;
- improve the provision for pupils with no school place to provide access to a broad and balanced curriculum by confirming and implementing a costed action plan to increase the provision for pupils educated otherwise than at school to full time in line with the recommendations of DfEE Circular 11/99;
- identify and adopt a comprehensive database which will enable the LEA to track
  the location and educational progress of pupils educated otherwise than at school
  and those in public care, and identify those strategies which have a positive
  impact on attainment;
- monitor the effectiveness of the proposals to improve behaviour support through the new EBD school and outreach work;
- ensure that schools are clear about referral procedures for child protection;
- support schools in promoting the achievement of pupils from ethnic minority backgrounds by developing guidance and improving the quality of data available to facilitate setting challenging targets; and
- ensure that strategies for the monitoring of racist incidents are implemented.

#### APPENDIX: RECOMMENDATIONS

## To increase the LEA's capacity to tackle the backlog of tasks and to enable it to address more effectively the range of issues it currently faces, it should:

 consider supplementing the senior team in the education department, at least for a limited period, to enable it to address as soon as possible the large number of social inclusion and other issues identified in this report.

#### To improve the quality of the EDP it is necessary to:

- establish a realistic and manageable set of priorities based on a new audit of local need, including addressing the standards at Key Stages 3 and 4;
- identify clear success criteria and monitor and evaluate the plan against these;
   and
- ensure that the plan links more directly with other plans, including corporate plans such as the social inclusion strategy.

#### To improve the allocation of resources to priorities it is important that:

- strategic and operational plans, including the EDP, are costed; and
- the effects of proposed changes in the LMS formula on individual schools are clearly communicated so that schools can plan to use the resources effectively.

### In order to improve the support for ICT in the curriculum, it will be necessary to:

- develop, communicate and implement a fully coherent strategy; and
- provide effective support to schools for assessing pupils' attainment and progress in ICT.

# To ensure that the education department has a central role in the council's community strategies for addressing city regeneration, raising standards and tackling social exclusion, it is necessary for the council to:

- improve the co-ordination between the council's corporate aims and departmental strategies and planning, including the Education Development Plan; and
- monitor more rigorously the contribution of departments such as education to corporate objectives.

#### In order to improve the brokering of services:

- networking arrangements should be further developed for clusters of schools to secure cost effective and reliable services, particularly for small schools;
- the interests of schools should be represented in brokering and monitoring management services to ensure high quality at reasonable cost.

In order to improve ICT for school administration and management and provide the basis for a more effective electronic information and communication infrastructure:

• an ICT development strategy should be produced supporting hardware, software and connectivity between the council and its schools.

# In order to provide better support for pupils with special educational needs and to demonstrate value for money:

- schools dealing with high levels of behaviour difficulties need further advice or support about appropriate strategies;
- a system for auditing the impact of delegated funds needs to be established; and
- additional curriculum support for special schools needs to be provided or brokered.

#### To improve aspects of access it will be necessary to:

- improve the provision of school places by setting out an overall school organisation plan with time-scales and actions for secondary school organisation, secondary school sixth forms, special school places and organisation, and removal of surplus places;
- improve the provision for pupils with no school place to provide access to a broad and balanced curriculum by confirming and implementing a costed action plan to increase the provision for pupils educated otherwise than at school to full time in line with the recommendations of DfEE Circular 11/99:
- identify and adopt a comprehensive database which will enable the LEA to track
  the location and educational progress of pupils educated otherwise than at school
  and those in public care, and identify those strategies which have a positive
  impact on attainment;
- monitor the effectiveness of the proposals to improve behaviour support through the new EBD school and outreach work;
- ensure that schools are clear about referral procedures for child protection;

- support schools in promoting the achievement of pupils from ethnic minority backgrounds by developing guidance and improving the quality of data available to facilitate setting challenging targets; and
- ensure that strategies for the monitoring of racist incidents are implemented.

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