Llywodraeth Cymru
Welsh Government

Education otherwise than at school (EOTAS) Framework for Action

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Audience

Staff and teachers in charge of pupil referral units and staff working in wider forms of EOTAS provision; headteachers; private and third-sector EOTAS providers; local authorities.

Overview

The *Education otherwise than at school (EOTAS) Framework for Action* is our long-term plan to improve outcomes for learners accessing EOTAS provision.

Action required

For use in developing support policies and strategies.

Further information

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Additional copies

This document can be accessed from the Welsh Government's website at gov.wales/educationandskills

Related documents

Evaluation of education provision for children and young people educated outside the school setting – Final report (Welsh Government, 2013)
Education other than at school: a good practice survey (Estyn, 2015)
Education other than at school (Estyn, 2016)
The Annual Report of Her Majesty's Chief Inspector of Education and Training in Wales 2013–2014 (Estyn, 2015)
The Right to Learn – Supporting children and young people at pupil referral units to reach their potential (The Children's Commissioner for Wales, 2014)
Exclusions from schools and pupil referral units (Welsh Government, 2015)
Successful Futures – Independent Review of Curriculum and Assessment Arrangements in Wales (Welsh Government, 2015)
National model for regional working (Welsh Government, 2015)

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Background

In 2011, the Welsh Government commissioned the University of Edinburgh to examine the process of exclusion from schools in Wales, and the delivery, planning and commissioning of education provision for children and young people in education otherwise than at school (EOTAS) provision. The report identified that EOTAS provision, including the availability of places, the nature and the purpose of provision, was highly variable between authorities. There were issues with EOTAS provision across the sector, but in particular the quality of the curriculum available and difficulties in providing a full curriculum.

In 2014, the Children's Commissioner for Wales reported specifically on Pupil Referral Units (PRUs) in *The Right to Learn*. Perhaps of most concern was the Children's Commissioner's view that the situation in relation to PRUs had not improved in the six years since the office began gathering evidence on them. The report concluded that the provision of learning across PRUs was inconsistent and that, for some learners attending a PRU, it was actually having a negative impact on their wellbeing.

The 2013/14 Estyn Annual Report was published in January 2015, the report highlighted significant concerns regarding outcomes for learners accessing PRU provision. Inspection outcomes for PRUs varied greatly and, with the exception of a few PRUs, were generally worse than any other sector.

The weight of evidence in relation to EOTAS, and in particular PRUs, supports the need to develop a strategic approach to address failings, and to promote and disseminate the positives in the sector.

The EOTAS Task and Finish Group was established in September 2015 with the purpose of developing practical solutions to the recommendations of these reports. The Group was chaired by the former Estyn Chief Inspector Ann Keane and included representatives from the Welsh Government, local authorities, schools, PRUs, Estyn and the Office of the Children's Commissioner.

The work of the EOTAS Task and Finish Group was divided into two phases. The first focussed on PRUs; the second on wider EOTAS provision.

Through workshops held at PRU and EOTAS conferences six key areas for improvement were identified, these were:

Leadership;
Accountability;
Resources;
Structures;
Learner Wellbeing; and,
Outcomes.

A series of proposals have been developed during the EOTAS Task and Finish Group's considerations, and in discussion with the sector at various conferences, with these key areas in mind.
For ease of reference, annex 1 contains a breakdown of the 33 proposed actions and which of the recommendations, placed on the Welsh Government it seeks to address.

What is EOTAS?

EOTAS is education provision to meet specific needs of pupils who, for whatever reason, cannot attend a mainstream or special school. In law, local authorities are responsible for providing these services.

The existence of EOTAS provision is, in part, a response to exclusion from school. This might include formal disciplinary exclusion or a placement as an alternative to exclusion. EOTAS may also be used for reasons of health and safety where groups, such as pregnant young women, are not considered suitable for mainstream school education.

Children and young people in EOTAS, and in particular in PRUs, are some of the most vulnerable learners. They often come from chaotic and challenging backgrounds. They can frequently experience family breakdown and mental health issues, and are often exposed to substance misuse and domestic violence. It is no surprise therefore that these children and young people find themselves in negative patterns of behaviour which impacts on their learning and, as a result, have less than positive learning outcomes.

The Education Act 2002 and the Education and Skills Measure 2009 provide governing bodies with the power to commission external services. This power can be extended to services of an educational nature. The provisions in law are intended to enable governing bodies to fulfil their responsibilities with regard to 14-19 Learning Pathways. These services should only be used where the school is unable to meet the curricular needs of the learner i.e. by providing vocational or specialist subjects.

A number of schools have started commissioning services which are being referred to as 'Alternative Provision'. It is important to note that the term 'Alternative Provision' is not defined in Welsh law. The use of this term alongside EOTAS has caused confusion within the sector with regard to who maintains responsibility for the services being used.

It was never the policy intention of the Welsh Government that schools and their governing bodies commission their own EOTAS or 'Alternative Provision'.

The Welsh Government does recognise that this confusion is compounded by the use of the term 'Alternative Provision' within some non-statutory guidance. The EOTAS Delivery Group, established in July 2017 to oversee the implementation of the Framework for Action, has been tasked with reviewing this guidance and recommending revisions.

The Welsh Government does not consider it appropriate for schools to commission external provision for the purposes of addressing behavioural issues, for example, home tuition for school refusers. This is set out in the Welsh Government's statutory guidance 'Exclusions from school and pupil referral units'.

The Framework

Phased approach

Successive reports have indicated a need for national government to take a stronger role by establishing national policies and procedures. However, the Welsh Government has considered the organisation of EOTAS and PRUs to be a local matter, there is little available evidence regarding what policies and procedures are likely to improve accountability and learner outcomes when introduced on an all-Wales basis.

In 2014, the OECD published their report *Improving Schools in Wales: An OECD Perspective*. The report made four over-arching recommendations, the last of which concerned the development of a defining long-term education strategy that builds on a select number of key priorities. In September 2017, the Welsh Government published *Education in Wales: Our National Mission*: our action plan responding to the OECD and setting out the next stage in our reform journey. At its heart, the action plan focusses on raising standards for all, reducing the attainment gap, and an education system that is a source of national pride and public confidence. The success of its implementation will require effective and honest engagement between all facets of the education system.

For this reason, Welsh Government believes a phased approach involving the development on non-statutory guidance and a catalogue of best practice options would provide local authorities with the necessary lead-in time to conduct any potential reorganisation before the consideration of any potential statutory requirements. A phased approach will also allow the EOTAS Delivery Group to work alongside the Welsh Government to ensure that EOTAS transformation complements the wider reforms happening across the sector.

Before the non-statutory and statutory requirements can be established, short-term proposals focus on the need to expand the current evidence base and develop model policy options. In this way, the EOTAS Delivery Group can ensure that factors affecting the day to day implementation of national policies can be fully explored with the sector to ensure their effective delivery.

Key provisions

Stakeholder workshops held at the start of the Framework for Action development process identified some common requests for change within the sector across Wales. The change requests included encouraging the involvement of PRUs in collaborative working, improved information collection and sharing and greater stability in the structure and organisation for PRUs and other EOTAS providers.

This information, alongside the recommendations for Welsh Government, helped provide the basis for the inaugural EOTAS Task and Finish Group

meeting; and the solutions developed by the EOTAS Task and Finish Group in response form the key provisions within the Framework for Action.

EOTAS panels

A commonly held concern across the EOTAS sector is that the referral process for accessing EOTAS provision is not robust enough and inconsistent practice exists across Wales. On the whole, local authorities do not appear to have sufficient controls in place to ensure that learners accessing provision have been appropriately placed, and that all other interventions have been attempted by their mainstream school.

Some local authorities are already trying to introduce such controls by establishing EOTAS panels. These are panels consisting of key personnel i.e. Educational Psychologists, Education Welfare Officers, Inclusion Officers, Headteachers and Pupil Referral Unit (PRU) Teachers in Charge etc. which acts to fulfil a gatekeeping function to ensure the appropriateness of referrals and monitor placements.

Welsh Government and the EOTAS Task and Finish Group consider the establishment of EOTAS panels as a positive step to prevent vulnerable learners from being inappropriately placed in PRUs or other EOTAS provision. Welsh Government proposes to introduce guidance recommending that all local authorities adopt this practice; however Welsh Government also recognises that not enough evidence of what makes them successful currently exists so Welsh Government will be commissioning analysis of existing EOTAS panels to help expand the evidence base.

Training for management committees

In February 2015 the regulations relating to management committees came into force. Although many PRUs had management committees in place prior to the regulations being introduced, not all did. Welsh Government has already committed to a review of the effectiveness of management committees once the formal requirements have had the opportunity to bed in. The EOTAS Delivery Group will consider the focus and timeliness of the review as part of the implementation process for the Framework. The outcome of the review will help inform the long-term potential legislative work to raise the status and standards of PRUs.

Feedback from stakeholder conferences raised concerns relating to the training available to management committee members and regional consortia challenge advisors regarding the responsibilities of PRUs.

For example, management committee members are not given support and training equivalent to that offered to governing body members. As a result, management committees are not offering sufficient challenge and support to PRU staff and Teachers in Charge.

Although the current training modules offered to governing bodies would not be appropriate, due to them focussing on responsibilities not currently placed

on management committee members, the support mechanisms and materials available to school governors could provide the template for extending support. This support could include handbooks for management committee members, access to information sharing networks and the development of PRU focussed training modules.

EOTAS commissioning frameworks

According to Estyn's report 'Education Other than at School' published in June 2016, some schools and local authorities are commissioning EOTAS services from private providers, unaware that they are operating unregistered, potentially illegal provision. To prevent this and to ensure that provision that meets the criteria becomes appropriately registered; the Welsh Government proposes a requirement for local authorities to establish commissioning frameworks for EOTAS services.

The commissioning framework will provide a set of guidelines for organisations seeking to provide EOTAS services to a local authority.

Any organisation seeking to provide EOTAS services to learners whose education is maintained by the local authority, will have a set of guidelines within the framework regarding the education, safeguarding and wellbeing responsibilities they will be expected to fulfil.

The local authority reporting to the EOTAS panel will be responsible for undertaking all necessary checks to ensure they are satisfied that the organisation has met their requirements. Once the local authority has undertaken these checks, the EOTAS panel can agree the organisation's 'approved' status. A database should be made available to all maintained schools within the local area.

Once an EOTAS provider has been entered onto the local authority's database as 'approved', the local authority will have a responsibility to regularly monitor the provision available to ensure that the quality of the provision available, and all necessary safeguarding precautions, remain suitable.

Local authorities will be asked to consider developing their commissioning frameworks on a regional basis and to make arrangements for sharing information regarding private and third sector providers across regions. Doing so will help to better identify organisations that meet registration criteria, when cross-border placements are taken into consideration.

Schools and local authorities will be required to ensure that any referral to an EOTAS service is via an 'approved provider'. In all cases where EOTAS services are being engaged, the local authority is responsible for the provision and the EOTAS referral panel should be notified.

Data and information sharing

Welsh Government has already begun publishing attainment data for PRUs (Key Stage 4). This was initially released via the annual statistical release on performance by pupil characteristics in March 2016; this has now been extended to all EOTAS learners and is part of the main attainment statistical release published every autumn.

These changes were made by Welsh Government in response to the University of Edinburgh, Estyn and the EOTAS Task and Finish Group identifying the lack of clear accountability structures and mechanisms as one of the many areas for improvement in the EOTAS sector.

However, Welsh Government recognises the difficulties associated with comparing EOTAS learners with mainstream learners in a 'like for like' fashion. In practice, the majority of EOTAS learners do not start from the same baseline as mainstream learners. Key performance indicators, such as Level 2 Inclusive, do not reflect the 'distance travelled' for vulnerable learners, in particular those in EOTAS provision, and the important work EOTAS staff undertake to address the often complex wellbeing needs faced by this vulnerable cohort.

Our education system must stretch the brightest, while at the same time making sure everyone attains the essential level of skills to build on in later life. In order to do this we need an accountability system that should be: fair, coherent, proportionate and transparent.

The Welsh Government review of accountability will result in a system that has clear roles and responsibilities, which promotes inclusion and equity, and where performance indicators will provide evidence for, and drive improvement in the attainment and progress of every learner.

> With considerations regarding the future of Welsh Government data collection as part of curriculum reform'; the EOTAS Task and Finish Group agreed not to review what data should be collected and how it should be used.

Instead the EOTAS Task and Finish Group have focussed its discussions on how EOTAS and PRU data is collected and who should 'own' this data and therefore be accountable for outcomes. The discussions of the EOTAS Task and Finish Group identified a need for more fundamental work relating to data collection. This includes ensuring all PRUs and maintained EOTAS settings have access to central information management systems and formalising daily information sharing procedures i.e. attendance recording.

Once the basics for data collection have been established, PRU and EOTAS settings will be better placed to review their outcomes and assess the needs of their provision and learners.

While this work is ongoing, the EOTAS Delivery Group will ensure that the needs and concerns of the EOTAS sector are reflected in the wider discussions taking place to develop and implement curriculum reform.

Curriculum reform
Learners accessing EOTAS services should be able to reintegrate into mainstream schools, or transition into FE placements when appropriate, but this is unlikely to happen unless their educational needs are given a status equal to their pastoral or wellbeing needs. In view of the new flexibility being built into the reformed curriculum via Successful Futures the ability for PRUS and other EOTAS settings to dis-apply the curriculum should be reviewed. The EOTAS Task and Finish Group proposed the removal of the ability to dis-apply the curriculum should be subject to consultation as part of the Framework for Action.

Welsh Government and the EOTAS Task and Finish Group recognise that one of the strengths of EOTAS lies in its flexibility. It is likely that there will be occasions, on an individual basis, where the disapplication of the curriculum is appropriate for a learner.

The EOTAS Task and Finish Group recommended option would be to remove the ability to 'blanket' dis-apply the curriculum. Instead the Welsh Government would seek to introduce tighter controls whereby the curriculum can be dis-applied based on an individual learners needs rather than the setting.

One of the key provisions of the Framework for Action is the establishment of access panels, the EOTAS Task and Finish Group considers that it would be the responsibility of the access panels to judge the suitability of a disapplication of the curriculum for an individual learner. The judgement should be reviewed periodically, with full and accurate records kept, which may be scrutinised by Estyn during inspection.

Collaboration and partnership working

Education in Wales: Our National Mission recognises the need to strengthen collaborative working in PRUs and wider EOTAS provision to ensure that the vulnerable learners accessing EOTAS provision are better supported to succeed. We are developing a new *National Model for Regional Working* in partnership with local authorities, regional consortia and diocesan directors. EOTAS will be in scope for the new national model which we aim to make available in 2018.

The size and organisation of most PRUs (and other EOTAS services), makes it difficult to offer the full curriculum. In order to fulfil the requirements of the new curriculum it will be vital that PRUs and other EOTAS providers work in partnership with local schools and Further Education settings.

In order to provide a level of parity for EOTAS services, the EOTAS Task and Finish Group believes that EOTAS providers, PRUs in particular, should be included in the ongoing work to develop self-improving systems. This should

be sought through brokering support and sharing expertise and knowledge through strategic partnerships with other EOTAS providers within regional consortia areas.

The Children's Commissioner's report 'Right to Learn' and feedback from the PRU conferences has indicated that many within the sector had underdeveloped networks with their local schools, local authority, regional consortium and even other local EOTAS providers.

As PRUs are legally a type of mainstream school as well as a form of EOTAS provision, most PRUs should have existing pathways into their regional consortium. These pathways should be explored as a mechanism for fostering the collaborative and partnership working needed to enable PRUs to share and adopt good practice within the 'Self-Improving System' and meet the educational needs of vulnerable learners through the sharing of facilities and expertise.

However, the current National Model for Regional Working does not provide for consortia involvement in 'wider' EOTAS provision i.e. non-PRU provision. To ensure a consistent approach within the EOTAS sector, the EOTAS Delivery Group will work with the Welsh Government to explore the inclusion of wider EOTAS provision within the remit of the National Model for Regional Working.

Annex: EOTAS Framework for Action – full proposals

This paper sets out the proposed actions in the Welsh Government's *Framework for Action* by key provision, and how they seek to respond to the various recommendations made to the Welsh Government from a number of sources[1].

Key provision: Access panels

Short, medium or long term	Recommendation	Proposed action
Short term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government to commission analysis of LA access/referral panels
Short term	Welsh Government to increase resources to promote effective consortium working at local authority level to share strategies for reintegration (Edinburgh:R12) Examples of effective strategies on reintegration should be gathered and disseminated (Edinburgh:R20)	Welsh Government to commission best practice analysis of referrals into EOTAS and reintegration procedures
Medium term	Welsh Government to increase resources to promote effective consortium working at local authority level to share strategies for reintegration (Edinburgh:R12) Examples of effective strategies on	Welsh Government to develop non-statutory guidance on the establishment of local authority EOTAS panels as well as referral and reintegration procedures

1 Welsh Government's EOTAS review 2011, Edinburgh University's research 2012, Estyn's thematic surveys on EOTAS 2015 and 2016 and the Children's Commissioner for Wales' report *The Right to Learn*.

	reintegration should be gathered and disseminated (Edinburgh:R20)	
Long term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government to consider the development of the statutory functions of EOTAS panels within primary legislation

Key provision: Commissioning framework

Short, medium or long term	Recommendation	Proposed action
Short term	Encourage LAs to develop clear aims and purposes for EOTAS provision (Edinburgh:R15) Publish new guidance on commissioning alternative provision (EOTAS review 2011:A9)	Welsh Government to undertake research into best practice for commissioning frameworks and quality assurance for EOTAS provision
Medium term	Publish new guidance on commissioning alternative provision (EOTAS review 2011:A9)	Welsh Government to develop non-statutory guidance on the development of commissioning frameworks and quality requirements for EOTAS provision which includes ongoing monitoring of placements.
Medium term	Publish new guidance on commissioning alternative provision (EOTAS review 2011:A9)	Welsh Government to commission an analysis of the effectiveness of commissioning frameworks including identifying unregistered independent

		schools
Long term	Publish new guidance on commissioning alternative provision (EOTAS review 2011:A9)	Welsh Government to consider introducing a statutory requirement for local authorities to establish commissioning frameworks

Key provision: Management committee support

Short, medium or long term	Recommendation	Proposed action
Short term	Work with consortia to provide robust support and challenge for PRU managers and management committees (Estyn 2015:R7)	Welsh Government to commission WLGA led analysis of training needs for management committees
Short term	Make management committees statutory[2] and issue supporting guidance (EOTAS review 2011:A8)	Welsh Government to explore the feasibility of expanding the support available, via various stakeholders, to management committee members
Short term	Work with consortia to provide robust support and challenge for PRU managers and management committees (Estyn 2015:R7)	Welsh Government to commission a review of the effectiveness of management committees
Medium term	Work with consortia to provide robust support and challenge for PRU managers	Welsh Government to explore the options for supporting the tailoring and delivery of specific PRU training modules in liaison

[2] Management Committees were made statutory in 2015 via the Education (Pupil Referral Units) (Management Committees etc.) (Wales) Regulations 2014

	and management committees (Estyn 2015:R7) Make management committees statutory and issue supporting guidance (EOTAS review 2011:A8)	with public sector stakeholders.
Medium term	Make management committees statutory and issue supporting guidance (EOTAS review 2011:A8)	Welsh Government to consider arrangements for PRUs and LAs to make sustainable improvement to resources such as professional learning, MIS infrastructure, management committee training etc

Key provision: Data and information

Short, medium or long term	**Recommendation**	**Proposed action**
Short term	Set out clearly the responsibilities of schools towards pupils who are registered with them (EOTAS review 2011:A15)	Welsh Government to undertake an analysis of pupil registration and exclusions data
Short term	Set out clearly the responsibilities of schools towards pupils who are registered with them (EOTAS review 2011:A15)	Welsh Government to commission analysis of pupil registration practices across Wales to better enable data collection and establish best practice regarding accountability and outcomes.
Short term	Gather and disseminate data on outcomes for EOTAS pupils (Edinburgh:R21) Strengthen guidance to LAs and schools	Welsh Government will work with Careers Wales and LAs to explore the options for improving the collection of data from former EOTAS learners to identify effective

	regarding the requirement to maintain records of the numbers of pupils receiving EOTAS who go on to become NEET (Estyn 2016:R1)	interventions and inform future provision.
Medium term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government and Estyn to develop a new information collection and sharing protocol and schedule
Medium term	Continue the registration and de-registration process for PRUs and reaffirm through regular audit of LAs' provision (EOTAS review 2011:A7)	Welsh Government to introduce non-statutory guidance on PRU opening and closing procedures
Medium term	Offer clear guidance on the registration and monitoring of progress of EOTAS pupils (Edinburgh:R9)	Welsh Government to consider the introduction of standardised procedures, supported by changes to pupil registration regulations, for the registration of EOTAS learners
Medium term	Develop benchmarking framework for evaluating outcomes and vfm (Edinburgh:R15) (EOTAS review 2011:A13)	Welsh Government to explore the possibility of amending current legislation regarding the collection of data from EOTAS services in alignment with the introduction of standardised procedures
Long term	Develop benchmarking framework for evaluating outcomes and vfm (Edinburgh:R15) (EOTAS review 2011:A13)	Dependent upon the outcome of considerations regarding the amendment of data collection legislation, the Welsh Government will amend existing regulations as part of the wider legislative proposals

Key provision: Successful Futures

Short, medium or long term	Recommendation	Proposed action
Medium term	Ensure the role of PRUs is fully considered and included within the Donaldson recommendations (CCfW:R4)	Welsh Government to consult on potential options relating to the disapplication of the curriculum
Medium term	Ensure the role of PRUs is fully considered and included within the Donaldson recommendations (CCfW:R4)	Welsh Government to consider amending current primary legislation relating to the disapplication of the curriculum as part of the wider curriculum reform
Long term	Develop benchmarking framework for evaluating outcomes and vfm (Edinburgh:R15) (EOTAS review 2011:A13)	Welsh Government to further consider how 'soft' outcomes can be measured and incorporated into a benchmarking framework for PRUs and how this will be appropriately aligned with work being undertaken as part of curriculum reform

Key provision: Collaboration

Short, medium or long term	Recommendation	Proposed action
Medium term	Provide framework guidance on role of PRUs as part of continuum of provision (Estyn 2015:R8)	Welsh Government should work with regional consortia to explore options for further strengthening partnership networks between PRUs and EOTAS providers and LAs and schools

Other

Short, medium or long term	Recommendation	Proposed action
Short term	Work with consortia to ensure needs of PRUs are reflected in consortia's operations (CCfW:R1) Work with consortia to provide robust support and challenge for PRU managers and management committees (Estyn 2015:R7)	Welsh Government to work with regional consortia to assess learning and development requirements for challenge advisors working with PRUs
Short term	Amend funding formulae to include pupils solely registered at EOTAS (EOTAS review 2011:A4)	Welsh Government to continue to make PDG available to PRUs for single-registered pupils and to consider amending PDG guidance
Short term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government to review the 21st Century School bidding and funding process to ensure that PRUs (and other EOTAS settings where appropriate) are considered in local authority bids
Medium term	Set out clearly the responsibilities of schools towards pupils who are registered with them (EOTAS review 2011:A15)	Welsh Government to produce guidance on responsibilities and lines of accountability across provision and local authorities including those responsible for registration.
Medium term	Ensure PRU staff benefit from national strategies to improve teaching and leadership (Estyn 2015:R10)	Welsh Government and Delivery Group to consider how PRU and EOTAS staff, including leaders, can be supported to

	Ensure that those delivering EOTAS are included in development and implementation of new elements on behaviour and additional learning needs within CPD for practitioners (EOTAS review 2011:A2)	undertake career development in line with proposals developed through the national approach to professional learning and leadership and in liaison with pioneers and partner schools
Long term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government to consider the development of primary legislation which includes the introduction of a new organisational structure for educational settings currently known as PRUs
Long term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Dependent upon the drafting of the primary legislation, the Welsh Government will develop regulations to amend existing secondary legislation
Long term	The proposed action does not refer to any specific recommendation, but was agreed as part of the work of the EOTAS Task and Finish Group.	Welsh Government to support the proposed primary and secondary legislation by the introduction of statutory guidance