

ALIGN: The Voice of Non-School Alternative Provision

Announcement:

Our response to the DfE's new National Standards Framework and Consultation Response¹

November 2025

The vast majority of non-school Alternative Providers have long embraced the concept of a national standards framework; this is clear in the quantitative analysis of responses to the consultation published in the DfE's: [Strengthening Protections in non-school alternative provision²](#).

Overwhelmingly ALIGN members have welcomed the standards; without exception they have found the structure and content of the DfE standards to be helpful in terms of clarity about what is required from them, and have noted that they draw confidence from having a strong baseline in place. The ALIGN steering group has done significant work in producing [a schema which corresponds to the DfE's framework](#) and provides detailed examples on how the standards can be met in a diverse range of settings. Members are implementing these and commissioners are responding positively.

The DfE's response to the consultation contains elements which ALIGN members have received positively. The term 'non-school', for example, as a replacement for the less helpful 'unregistered' is welcomed wholeheartedly across our membership. That said, there is one aspect of the response which is raising significant concerns among ALIGN members, namely the government's emphasis on the importance of time-limited placements in non-school AP.

The response to consultation makes clear that legislation will be introduced which will insist on non-school AP placements of no more than 12 weeks of full time support or 2 days of longer term part time support alongside 3 days in school. It takes time to develop effective relationships with pupils who have had difficult experiences in education. Time limited placements will curtail positive impact and defeat the purpose of an AP referral for pupils for whom AP is not an early intervention. [The SEND and AP Improvement Plan](#) (March 2023) and guidelines for [Arranging Alternative Provision](#) (Feb 2025) make clear that AP should, according to the DfE, always be a temporary stop gap on the route back to mainstream education. The reality is that it will take many years before the planned increase in specialist school/maintained AP placements will allow for this.

The response document is clear that non-school AP will need to deliver curricula which feed into the National Curriculum and support the child's learning in their mainstream setting. Many non-school APs deliver bespoke curricula linked to qualifications not on the National Curriculum; 12 weeks will not be enough time to complete these courses. For many children

¹ ALIGN (Alternative Learning Initiative Group Network) was established in 2024 as a voice and a resource for the non-school AP sector. The group consists of over 700 members from across the UK and is the only non-paying membership organisation currently in existence for providers in the field

² *Strengthening protections in non-school alternative provision: Government consultation response*, Department for Education, p.24 shows 71% of providers who contributed to the consultation agreed with the need for a national standards framework

referred to non-school AP, GCSE passes are not a realistic goal - their future prospects will be more limited than had they remained at the non-school AP setting and gained the vocational qualifications offered.

ALIGN was part of the consultation process which contributed to the DfE's response document. During the meetings held with DfE representatives the issue of time-limited placements was discussed and ALIGN members were reassured by the DfE that the system would be implemented flexibly enough to take into account the needs of individual children. It was suggested that placements could be reviewed and extended where appropriate and that EOTAS packages may be the answer for those children who require long-term AP input.

The experience of ALIGN members in the weeks since publication of the standards and the response to consultation has been concerning. In many cases, our members have found schools and Local Authorities implementing the 12 week/2 day a week limit rigidly. Many LAs have created heavy administrative burdens which APs are obliged to navigate in order to access initial and renewed funding for students. The consequences of this intransigent approach present a potentially existential threat to many APs; the impact on some children has already been deeply harmful. One of our members has described receiving news that a student had attempted to take their own life during the summer break as a result of uncertainty over her continued attendance at the AP despite it being agreed by all parties it was the best place for her. The uncertainty was a direct result of the LAs interpretation of the, still voluntary, guidance.

Many of our members are considering applying for independent school registration so that they can continue to provide the bespoke education packages their students need. In one recent pre-registration visit, Ofsted inspectors noted that the AP was an extremely effective non-school setting, and queried the reason for registration. The AP team explained that they wanted to continue offering medium-long term bespoke placements which are not necessarily tied to delivering the National Curriculum; at this the inspectors expressed confusion as to why it would not be possible to review and extend existing placements, and to provide EOTAS packages for those who are unlikely to return to mainstream school. Ofsted clearly see the new arrangements as intended to be flexibly applied in the interests of the child, and were surprised to hear that some LAs are already enforcing time-limited placements stringently.

ALIGN members are committed to implementing the National Standards framework and to using responsive creativity to ensure that accountability in the sector improves as a result. However, members view the concept of time-limited placements as described in the response document and as applied by some schools and Local Authorities, to be antithetical to high standards of non-school AP, rather than a key pillar of improvement which the DfE intends. The overinterpretation and premature implementation of key components of the planned legislation are already proving to be a threat to non-school AP providers, and this remains a significant concern for ALIGN members going forward.