CABINET MEMBER UPDATE		
Overview and Scrutiny (Children's Services and Safeguarding)		
Councillor	Portfolio	Date
Diane Roscoe	Cabinet Member Education	4 th June 2024

<u>SEND</u> Education, Health and Care Plans (EHCPs)

- Compliance with the 20-week timeframe for Education, Health and Care Needs Assessments (EHCNA) currently sits at 35.5% for the year. January and February compliance was less than 30%. This was impacted by annual leave and the statutory deadline for phase transfers. March and April have both been 46% which is more inline with the consistent figures from 2023. The improvement plan for this year is to be at 60% compliance consistently by the end of the year.
- Compliance for Health and Educational Psychology advice being returned continues to be over 90% with Social Care advice being returned within 6 weeks consistently over 70% of the time since September 2023.
- There are also several legacy assessments and annual reviews taking place which have also been picked up, which have affected timescales. There is agreement for two agency casework officers to be appointed for a 6 month period. They will solely work on the backlog of assessments and reviews so that the compliance increases.
- The current number of Education Health and Care Plans (EHCPs) which are out of time, i.e. have exceeded the 20-week statutory timescale is 140. This is an increase of 36 since last reported.
- A weekly EHCP dashboard has been developed in conjunction with Business Intelligence to enable real time monitoring of performance and blockages. A weekly SEND performance subgroup of SENDCIB is meeting as well as weekly finance meetings.

STAFFING UPDATE

 At the end of December, Lynda Poole was initially appointed as the Interim Strategic Lead for SEND. She has recently been appointed as interim AD for Education Excellence. Lynda has also recently been part of an authority inspected as part of the new OFSTED LAP (Local Area Partnership) SEND arrangements, so brings with her up to date knowledge / experience and challenge to aid inspection preparation. As of January 2024 the SEN Team comprised of 19.5 Casework Officers, but further capacity is required within the SEND service to prepare for the Area SEND Inspection and to deliver the workplans. This includes both administrative and project support. A business case was submitted and approved for additional business support within Education Excellence on a temporary basis

SCHOOL IMPROVEMENT

- **Ofsted:** As of April 2024, 94% of maintained primary schools are rated good or better, with 12% outstanding. 100% of the maintained nurseries, and maintained secondaries are good or better.
- The LA has a new senior HMI, Pippa Jackson-Maitland, who will continue to provide the termly briefings for headteachers - the next being on 24th May at the PDC.

Support for schools:

- A revised 'School Improvement Strategy' document is being developed, that will incorporate the 'Schools Causing Concern' protocols – final amendments will be made over the summer for presentation to stakeholders at the start of the academic year.
- There are 6 schools currently on the 'Schools Causing Concern' protocol: 5 primaries, and 1 PRU. This is a reduction of 1 school since the last report.
- The EE Strategy Day (April) was well attended and received very positive feedback.
- Next year's programme of CPD is currently being planned (including the role of LA partners) with a focus on strengthening links with LA priorities, and using local capacity and expertise.
- KS2 statutory assessment is currently underway monitoring visits have seen exemplary practice across the primary schools. Writing moderation visits will begin in June.
- Academisation: The number of academy conversions continues to place pressure on relevant EE teams and other LA services to meet the DfE requirements.

14-19 Participation

 With regards to the statutory duty to participate in learning post 16, we are currently working with professionals in our Children's Services Directorate, schools, PRU's, and our Home and Complementary Education Services to identify and support young people who at risk of becoming NEET. We will be monitoring progress over the Summer in accordance with our "September Guarantee" requirements which will include ensuring we have sufficient post 16 provision.

- Sefton also still has the lowest NEET and the best tracking performance for young people in the City Region and lower than our statistical neighbour which is Wirral. However there has been an increase in NEET and specifically for our vulnerable groups.
- The application for "Gaps in Provision" funding submitted to the D for E and ESFA on the 30/10/2023 in response to our concerns regarding progression routes for this cohort has been successful. The funding is for 100 places under the Study Programme and there has also been a commitment to fund 100 places for 2024/2025. The places have now been commissioned and three providers have now commenced programmes with the first cohorts: Southport and Hugh Baird Colleges and The Learning Foundry.
- Schools are still making steady progress in achieving the Gatsby Benchmarks in relation to standards for Careers Education, Information, Advice and Guidance (CEIAG). All secondary schools who have been inspected in 2024 have been judged to be meeting their statutory requirements for CEIAG. An Action Plan has been agreed to address the concerns raised in relation to the school that needed to make improvements. We have also been rolling out pilot programmes in relation to Careers Education in Primary settings with a focus on raising aspirations.

DBV (Delivering Better Value)

- Grant application was submitted in July 2023 and grant application was agreed in September 2023.
- Grant funding timescales of spend have been extended until September 25.
- All workstream activities are underway with project leads identified for each area.
- As part of the increase of Inclusion Service/Team capacity, plans to second two local school SENCOs are underway. They will support the development of the Graduated Approach Toolkit.
- The Early Years team has successfully recruited two Inclusion Support Workers and Inclusion Consultants. Some new staff have commenced in post and others are expected to start by Easter 2024.
- Planning for the mapping exercises on the graduated approach for ND and SEMH has begun. This is being facilitated through regular meetings involving colleagues from Education, Health and Care.
- Initial mapping exercises including all stakeholders have taken place in ND and SEMH with a gap analysis being completed.
- The workstream strategic management plan has been formulated and groups are meeting fortnightly to update action logs.
- Using feedback from a scoping exercise carried out by the Educational Psychology team a comprehensive CPD package has been developed. This is being presented to SAPH in April.

Graduated Approach

- A core group of leaders across partners (health, social care and education) has been established and meets fortnightly in order to maintain momentum and the delivery of the Delivering Better Values (DBV) graduated approach workstream outcomes.
- A mapping exercise for social, emotional and mental health (SEMH) and the neurodevelopment pathway offer (universal, targeted and specialist) has been completed with partners across schools, the LA, health and social care. Information has been formulated to identify gaps in services and commissioning opportunities. This needs to be scrutinised by the core group and further workstreams identified.
- The Occupational Therapy (OT) sensory work group meets fortnightly to develop the OT sensory offer and is currently gathering data to develop stage 2 of the OT sensory offer targeted support. Mapping exercises are planned for cognition and learning and sensory VI/HI and Physical in the next term.
- The two secondment SENCO position interviews are to be held on the 1st of March. It is hoped that staff recruited to the posts will be able to start immediately. A clearly defined part of this role is to support and develop the graduated approach online toolkit and to support further inclusion capacity.

Staffing Update

- At the end of December, Lynda Poole was initially appointed as the Interim Strategic Lead for SEND. She has recently been appointed as interim AD for Education Excellence. Lynda has also recently been part of an authority inspected as part of the new OFSTED LAP (Local Area Partnership) SEND arrangements, so brings with her up to date knowledge / experience and challenge to aid inspection preparation.
- The Leadership structure across the whole of SEND has undergone a transition process to create stability and leadership going forward, including current members of the service stepping up into interim management roles.
- As of January 2024 the SEN Team comprised of 19.5 Casework Officers, but further capacity is required within the SEND service to prepare for the Area SEND Inspection and to deliver the workplans. This includes both administrative and project support. A business case will be submitted for Business Support within the SEN team to alleviate the pressure within the team and to support improved compliance with statutory timescales.

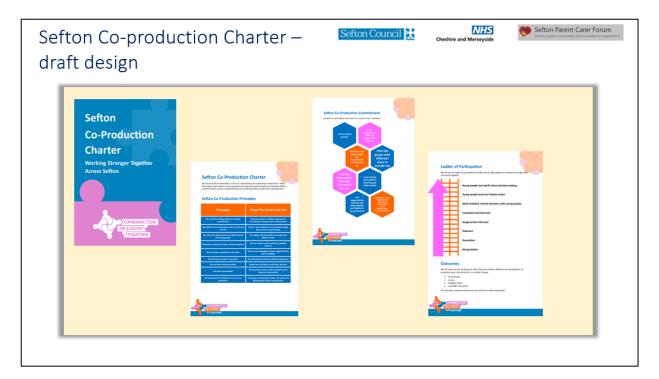
Partnership Working

- A more joined up approach to SEND is required. To facilitate this workplans are being combined into one comprehensive document. This will provide an overview of all the programmes currently underway across all partners, as well as demonstrating the interconnectivity between each strand of work.
- There has been drift and delay with several streams of work due to staff absence.

• Links and relationships with schools and settings are positive, but there is some frustration with stalled areas of work.

Co-production

• The Co-production subgroup ran a logo design competition for the Coproduction Charter and the winners of the competition have been selected. The Subgroup with support from Corporate Communications has created a draft Co-production Charter. The draft has been shared across the area partnership for sign off. The Charter will be launched, with a tool kit. Train the trainer training will also be available. A copy of the Charter is included below along with the winning logo design. The Charter will feature at a SPCF conference event in March.



SEND Strategy

• There has been a slight delay with the production of an Area SEND Strategy. However, now that the interim AD is in place, this is being addressed as a matter of urgency. The strategy must be an area wide strategy across Education, Health and Care and must be co-produced with parents, carers, children and young people.

Sufficiency Planning

- Several meetings have been held with Headteachers to collate views on sufficiency of SEND places across the borough, to establish expectations and to map the landscape.
- Data analysis is currently taking place.
- Recommendations and actions are being discussed for the development of the SEND place sufficiency strategy and plan. Working groups with headteachers have been set up and are meeting regularly to strategically plan the short/medium/long term needs for further developing more SEND places within Sefton. Joint weekly meetings have also been set up within the Council bringing together finance, property, admissions, and SEND to drive the growth of places forwards.

Feedback from OFSTED

 The Childrens Services Ofsted Annual Conversation received positive feedback about the improved stability and recent leadership changes as well as several areas of good practice.

Alternative Provision

 An Alternative Provision (AP) Task and Finish group has been established. An analysis of AP placements has been completed. This includes a mapping of the reasons for the commissioning of individual placements within AP providers and the primary need of those children and young people placed within alternative provision. A QA framework has been developed. The compilation of an AP register is underway.

Exclusions and Attendance

• The Improvement notice has been lifted, but for the first time since 2003, pupils with an EHCP have been excluded. This includes very young children.

Elective Home Education

- 314 children are electively home educated in Sefton with Social Emotional and Mental Health (SEMH) being the most commonly cited reason for parents choosing home education.
- 2 full time members of staff have been recruited to the service. This means that monitoring of the arrangements made for children EHE can now take place on a regular basis, currently fortnightly. The aim of regular monitoring is to encourage and support the re-integration of children back into school placements, wherever possible.

Workplan

The work plan for the next 2 months includes:-

- The mapping of all SEND projects and workstreams to identify duplication / shared resources / actions / outcomes and interdependencies.
- The Place Planning SEND Sufficiency strategy Map and Co-produce strategy and plan with Head Teachers. Identify building works needed for September 2024 onwards and capital funding to create more pupil places in Sefton for September 2024 and September 2025 onwards.
- Alternative Provision QA all AP provision on a scheduled plan of work, (the intention is to share effort across the CM footprint)
- DBV Recruit DBV SENCos
- Graduated Approach Map universal, specialist and targeted services, identify barriers and gaps
- Area SEND Inspection Annex A develop action plan to move all "Orange" RAG rated outstanding areas to green. Refresh evidence held to ensure that it is up to date and available for inspection announcement. Preparation for Area SEND inspection continues.

Inclusion

- Send Inclusion Consultants are supporting the roll out of Relational Restorative Practice model with pilot schools. The team have been to Leeds to visit Carr Manor Community School for an immersion day as part of the offer. The follow up session delivered by Leeds has been booked for the 13th of March.
- The ASD team has supported the Reception Group Model, offering a comprehensive support and training offer.
- Ten schools which have been involved with the joint work with Tor View Behaviour Hub have received their half day visits. DBV funding will support the other 2 days required to support the other schools involved. Good feedback was received about the schools with action points which will inform the development of additionality of training offers from within the teams.
- All the teams within the Inclusion Service continue to support the Team around the School project and the development of the Inclusion and SEND offer.
- The Inclusion Service teams have continued to deliver the training offer.
- Quality Assurance visits to Alternative Provisions (AP) are underway. Inclusion Service teams are supporting these visits.
- The Hearing Need and Visual Impairment team facilitated a Merseyside and Cheshire training event on Ushers Syndrome.
- Group funding reviews have started to look at the how funding has been allocated to schools and the effectiveness of the model.

School Improvement

- **Ofsted:** As of 26th January 2024, 95% of maintained primary schools are rated good or better, with 12% outstanding. 100% of the maintained nurseries are good or better. All maintained secondary schools are now good, with Christ the King Catholic High improving from RI in their November 2023 inspection.
- The SI team continues to support Headteachers' well-being with an offer of support to all schools in the Ofsted window – this includes a website compliance check, a conversation with governors, support for subject leaders and health checks in SEN, inclusion and curriculum. This support is provided by the SI team, professional partners and the appropriate EE service, and there has been a good uptake.
- All schools are being encouraged to attend the termly briefings provided by our regional senior HMI, the next being on 1st March.
- **Support for schools:** Keeping in Touch (KIT) meetings between schools and their professional partner continue; all reports are quality assured by the SI team and common themes or concerns identified.

- The Schools Causing Concern protocols have been reviewed and amended in light of new DfE guidance, and to ensure our criteria and processes are robust; these have been approved by the School Improvement Board.
- There are 7 schools currently on the 'Schools Causing Concern' protocol: 5 primaries, 1 nursery and 1 PRU. This is a reduction of 3 schools since the last report.
- Academisation: There has been a rise in the number of schools converting to academy status currently 16 either confirmed or awaiting confirmation. This is placing relevant EE teams and other LA services under pressure to meet the timelines set by the DfE.

14-19 Participation:

- With regards to the statutory duty to participate in learning post 16, Sefton is still ranked first in the LCR and Northwest with 91.2% of young people moving into full time education.
- Sefton also has the lowest NEET and the best tracking performance for young people in the City Region and lower than our statistical neighbour which is Wirral. However there has been an increase in NEET and specifically for our vulnerable groups.
- The application for "Gaps in Provision" funding submitted to the D for E and ESFA on the 30/10/2023 in response to our concerns regarding progression routes for this cohort has been successful. The funding is for 100 places under the Study Programme and there has also been a commitment to fund 100 places for 2024/2025. The places have now been commissioned with a view to immediate referrals and starts.
- Schools are still making steady progress in achieving the Gatsby Benchmarks in relation to standards for Careers Education, Information, Advice and Guidance (CEIAG). All secondary schools apart from 1 who have been inspected in 2023/2024 have been judged to be meeting their statutory requirements for CEIAG. An Action Plan has been agreed to address the concerns raised in relation to the school that needs to make improvements. We have also been rolling out pilot programmes in relation to Careers Education in Primary settings with a focus on raising aspirations.

Early Years

- The Early Years Transition Event was held on Monday 13th May at Formby PDC and was a great success. We had 122 attendees from 90 schools and settings. Feedback from the event was very positive.
- The Early Years service has been collaborating with MVRP (Merseyside Violence, Reduction Partnership) on a number of projects. The ambition of the projects are to target WARDS to implement a place-based approach, targeted at Early Years children and families. The pilot will implement a range of 'preventative' interventions and programmes aimed at raising outcomes for children and families to reduce the risk of future criminality and violent offending.

- MVRP Evidence Hub identified the following wards: Church, Derby, Ford, Linacre, Litherland, Netherton and Orrell, St Oswald. Following a meeting Sefton, MVRP added Cambridge Ward into the initiative. We are looking to continue this work next academic year. Focussing on working closer with parents and Early Years Advocates campaign.
- We have successfully supported a number of our private nurseries and childminders to move from inadequate or requires improvement to 'Good'. The LA staff working with them have been very supportive and challenging in ensuring they were all fit for inspection and that the children are receiving good support. 98% of our private providers are either rated 'Good' or 'Outstanding'.
- Our Early Years SEND requests for involvement from the service continues to increase, and we have roughly 900 children currently supported across the Early Years SEND service with 172 Early Years Children accessing high needs funding (HNF).
- As part of the DBV work we have recruited two Early Intervention Officers who will support PVIs and childminders on Early Years inclusion on a holistic level and will not carry a caseload. We have also recruited, three further Inclusion consultants to support with school inclusion in Reception on a holistic level and will also not carry a caseload. All staff are now in post and are collaborating with settings and schools in preparation for academic year 2024/25.
- The Early Years Service have been chosen by the DFE to be part of a pilot for 'Early Years workforce incentives. We have had our delivery plan agreed and comms and marketing regarding this will begin in the next few weeks. We have sent out our application forms to those eligible settings and they can then begin their recruitment process. As part of the offer for this, we are offering settings the opportunity to be part of a Health and Well-being accredited project that will support recruitment and retention of staff.
- As part of the role out of the expansion of childcare, the Early Years service have been working closely with the sector, parents and other professionals on mapping supply and demand in regard to the new entitlements. Kim Evans is Project manager for both expansion of childcare and Wraparound agenda. We have actions plans that are reviewed on a weekly basis.
- Our application form for Capital funding and programme funding is with our legal team and we hope to share this with providers in the next couple of weeks.
- We have launched a number of radio campaigns for recruitment and retention, wraparound childcare and expansion of childcare all within sefton leisure centres.

The Virtual School

- Early Years Personal Education Plans (PEPs) are now being populated, with the first deadline being 22nd March, 2024. The Early Years team and Virtual School are collaborating to ensure that all Cared For children from the age of 2 have a PEP that will be reviewed each term. Already, this has had an impact on applications for schools, which will be completed in a timely manner and following discussions about choosing a school that best meets the needs of the child.
- Following the launch of the FE College and Virtual School Partnership Agreement, we are seeing improved stability in terms of young people remaining on courses or changing to a more appropriate course if they are unhappy. The ESOL course that was developed following the successful summer school is popular and provides a much-needed education and social network offer to our UASC students.
- Wellbeing continues to be a significant area of need. In addition to our commissioned Well Young Person provision, Pupil Premium Plus funding has been used to pilot an ACEs course for care experienced young adults. We are about to collect the impact reports from the school projects funded in the last academic year and we are already aware of the positive impact of modest investment in projects that target wellbeing and attendance in schools. Further funding for projects that promote wellbeing, inclusion or attendance will be offered to schools at the Education Excellence day in April.
- The Foster Carer Conference (sponsored by Sefton Virtual School) will be held in October 2024 and the theme is Education. The Virtual School is assisting with planning the activities.
- Our Sefton Superstars event (22nd March) will be a red-carpet, glittering celebration of the achievement and effort of our children. There will be performances from school choirs and our drama group, and the event will be compered by one of our alumni.
- The quality of PEPs continues to improve, and the return rate has been 92% for the last two terms.
- Attendance is, overall, above national average. However, there is still a concern about Years 9-11. A strategy is in place to address this: those with the lowest attendance are being visited by their Education Coordinator this term to ensure that we capture the voice of the child and offer challenge and support to the child, carers and schools.
- Finding appropriate schools for children with EHCPs continues to be a challenge. The Virtual School is working closely with the Sefton SEN team and is also in regular contact with other LAs to minimise delays. The Sefton VHT also works with the AD for Children in Care to ensure that education is prioritised when planning where a child will live and to promote colleagues' understanding of the protective factor of school attendance and stability.

SCHOOL ATTENDANCE

- The tables below detail Statutory School Age Children (Year Groups Reception

 Year 11). These children attend Sefton Schools including those living in
 neighbouring LAs travel into Sefton. Sefton council have a statutory
 responsibility for school attendance in Sefton schools irrespective of where the
 child lives.
- The information also include characteristics of children who have an EHCP and children who receive SEN Support and those in receipt of free school meals.
- Persistently Absent relates to children with between 50 and 90% attendance.
- Severely Absent relates to children with 50% less attendance.
- FSM = Free School Meals.
- CLA only refers to children attending a Sefton school despite which LA they live in and who are statutory school age i.e. children who are Nursery age and Post 16 are not included in this report.

All Schools.

Overall.

- 38 134 children on roll.
- Overall Attendance is 92.2%.
- Overall Absence is 7.8%.
- 7 985 children (20.9%) identified as Persistently Absent.
- 794 children (2.1%) identified as Severely Absent.

EHCP.

- 1 938 children have an EHCP.
- Overall, 5.1% of children have an EHCP.
- Overall Attendance is 87.1%.
- Overall Absence is 12.9%.
- 564 children (29.1%) identified as Persistently Absent.
- 115 children (5.9%) identified as Severely Absent.

SEN Support.

- 6 254 children have been identified as receiving SEN Support.
- Overall, 16.4% of children receive SEN Support.
- Overall Attendance is 88.5%.
- Overall Absence is 11.5%.
- 1 859 children (29.7%) identified as Persistently Absent.
- 301 children (4.8%) identified as Severely Absent.

FSM.

• 10 562 children are in receipt of FSM.

- Overall, 27.7% of children receive FSM.
- Overall Attendance is 87.8%.
- Overall Absence is 12.2%.
- 3 653 children (34.6%) identified as Persistently Absent.
- 479 children (4.5%) identified as Severely Absent.

CLA.

- 467 children are a CLA.
- Overall, 1.2% of children are a CLA.
- Overall Attendance is 92.1%.
- Overall Absence is 7.9%.
- 79 children (16.9%) identified as Persistently Absent.
- 15 children (3.2%) identified as Severely Absent.

The Service Manager for school's support services will be undertaking the targeted meetings at the secondary schools to ensure there is an attendance plan in place for these children with 50% attendance and below.

SCHOOL ADMISSIONS UPDATE

- The national offer day for secondary schools preferences will take place on 1 March 2024.
- Two schools in the South of the borough have been inspected and having a good judgement should increase confidence.

APPEALS

• There have been 219 appeals prepared since September 2023. All shortages of places are now admitted through the in-year fair access panel.

GOVERNOR SERVICES

• The Governor training programme for the spring and summer term has been distributed.

EXCLUSIONS

- Up to 17th February 2024 6,358 sessions lost to fixed term exclusion across 840 pupils.
- Up to 17th February 2023 4,065 sessions lost to fixed term exclusion across 637 pupils.
- There is an increase both in the pupils and the number of sessions. An inclusion strategy is being procedures with parents and partners.
- Exclusions continue to rise both across the northwest and the count in exclusions.

PUPIL PLACE PLANNING

Reception (Primary) entry 2024

We do not currently envisage any issues in sufficiency for this cohort. Preferences have been received from other LA's and including those application there does currently appear to be sufficient places in all areas to allocate places in reception to those who have applied. At this point there appears to also be sufficiency for alternative offers for the oversubscribed schools in each area of the borough. Maghull would have been of a slight concern however preferences for Lydiate Primary are low this year so those who cannot be allocated their preferences for other Maghull schools may be offered Lydiate Primary even though it might be a little further away from their home address. There is a significant amount of housebuilding in this planning area so numbers will increase in the future.

Secondary (Year 7) entry 2024

- 10 of the 18 secondary schools within the borough have agreed intake numbers in excess of their PAN for 2024. Mainly this applies to oversubscribed schools, although some have first preferences below PAN overall they will be filled using the equal preference scheme. Without these increases we may have struggled in some areas particularly within the Southport area. There has been a lot of new housing built in close proximity to two Southport secondary schools (Christ the King Catholic High & Meols Cop High). Much of this housing is situated in the Lancashire LA area however the housing sits right on the border with the Sefton and the Sefton schools are much nearer than any Lancashire schools are. As you can imagine may cause some issues for our residents.
- Bootle/Litherland area remains an overall concern for secondary admissions. The number of children in Year 6 at primary schools in this area (826 from October census) is much higher than the number of year 7 places available (590). This has been the case for a number of years due to school closures and the remaining schools in the area reducing their PAN's. The figure of **590 for 2024** is only possible as two academy schools have agreed an intake number above their PAN (Hillside High & Kings Leadership Academy Hawthornes). Historically we manage the allocations in this area as many children prefer schools in the Crosby or Maghull areas and some also opt for Liverpool LA schools, as it is very close to the Liverpool border. We also use the option of filling an undersubscribed school in Crosby for children in this area who cannot be offered their school(s) of choice, as generally that school is within 3 miles distance of the home addresses. We will do the same in 2024 to meet demand.
- The PAN for Litherland High School in particular remains a concern & we have raised this previously with the DfE.
- The school was rebuilt in 2011 to accommodate 240 per year group this considered the closure of Bootle High in 2009. Litherland High took over the feeder primary schools previously aligned to Bootle High (some of which have since closed) plus the existing feeder schools for Litherland High. More recently in the Bootle & Litherland areas, 3 High schools closed or have been merged (St Wilfrid's, St George of England & St Ambrose Barlow). Litherland High now has 7 feeder primary schools within their admission arrangements.

- Litherland High's funding agreement from when they became an Academy states the school's capacity as **1,200** which gives an indicated admission number of 240 across the 5 year groups. The PAN was reduced in 2019 at the request of the school presumably due to surplus places. Since 2019 demand for places at Litherland High has increased substantially. The LA understands that a Deed of Variation was made, in line with the arrival of Litherland Moss Primary School onto the same site in September 2022, which reduced the schools capacity to 750
- The school now has a PAN of **150**.
- In 2024 for the third year running the LA will not be able to allocate places to all of the children who attend Litherland High's 7 feeder primary schools. The result obviously is complaints & many admission appeals. For this reason the LA and the general public do not feel that this school is no longer serving the needs of local children. If possible we would like to request that this school is prioritised within the programme of revised net capacity assessments for academy schools as we are getting both parents and our appeals panels questioning as to why the PAN has reduced so much as they feel even with the primary school being on site the PAN should not be as low as 150

Education safeguarding

• All schools inspected since September have had effective safeguarding arrangements in place.