



MANCHESTER
CITY COUNCIL

Manchester City Council

Children and Education Services

Section 19 Policy

Introduction

Manchester's Children and Young People Plan describes Manchester's vision for all children and young people: 'Our Manchester is committed to building a safe, happy, healthy and successful future for children and young people.' This includes ensuring that children and young people of compulsory school age receive a suitable education either at school or otherwise than at school.

This is delivered through our overarching priorities:

- We will help children to live well in their families and communities and feel they belong; providing timely and effective support so that their parents/carers enable them to be safe, happy, healthy and successful.
- We will succeed in our roles as corporate parents so that children in our care achieve outcomes that are equal or better to all children.
- We will work to ensure children are safe from harm outside the home and work with parents, carers and other professionals to mitigate vulnerability, disrupt and prevent them being exploited, harmed or involved in offending.

- We will develop, deliver and influence effective commissioning of the best services which are equitable and responsive to children and family's needs and which are informed by them.
- We will work with schools and settings to enable appropriate, inclusive and high-quality education for every child to develop and be successful.
- We will help children and families to be confident, independent and resilient, and to prepare for transitions in their lives, including into adulthood.

This policy describes how the Council will achieve its commitment and meet its duties under relevant national legislation and guidance and has been written with due regard to the following legislation and statutory guidance:

- [Education Act 1996](#)
- [Children and Families Act 2014](#)
- Alternative Provision' Statutory Guidance (2025):
<https://www.gov.uk/government/publications/alternative-provision>
[Non-school alternative provision: voluntary national standards](#)
[Arranging Alternative Provision - guide for LAs and schools](#)
- Arranging education for children who cannot attend school because of health needs Statutory Guidance (2023):
<https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges>
<https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-schoolneeds-who-cannot-attend-school>
- Suspension and Permanent Exclusions' Statutory Guidance (2023):
[School suspensions and permanent exclusions - GOV.UK](#)
- Working together to improve school attendance Statutory Guidance (2024):
[Working together to improve school attendance - GOV.UK](#)
- Equality Act 2010:
<https://www.gov.uk/guidance/equality-act-2010-guidance>

Aims of the policy

- The Council's aim is to ensure that all CYP receive a suitable, full-time education. The council will work with all schools and settings to enable appropriate, inclusive and high-quality education for every child to develop and be successful
- When a child of compulsory school age is unable to access their educational setting due to illness, exclusion or otherwise, the Council must consider whether it has a duty under section 19 of the Education Act 1996 to make suitable provision for them.
- From the age of 5 to 16 it is compulsory that all CYP receive an efficient education, regardless of their circumstances. Where the Council has a duty to secure provision, this must appropriately meet the individual needs of the child and enable them to achieve good educational attainment on par with their mainstream peers.

Legal context

Section 19 of the Education Act 1996 requires local authorities to make arrangements to provide "suitable education at school, or otherwise than at school, for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive suitable education unless such arrangements are made for them". Suitable education is defined as "efficient education suitable to the age, ability, aptitude and to any special educational needs", the child (or young person) may have.

The education must be full time unless the Council determines that it would not be in the best interests of the child or young person, due to their mental or physical health.

The Department for Education Alternative Provision Statutory Guidance 2025 states: 'Local authorities are responsible for arranging suitable education for permanently excluded pupils, and for other pupils who – because of illness or other reasons – would not receive suitable education without such arrangements being made.'

This applies to all children of compulsory school age resident in the Council area, whether or not they are on the roll of a school, and whatever type of school they attend. Full-time education for excluded pupils must begin no later than the sixth day of the exclusion.

Good provision is that which appropriately meets the needs of pupils which require its use and enables them to achieve good educational attainment on a par with their mainstream peers.

The Department for Education guidance 'Ensuring a good education for children who cannot attend school because of health needs 2023' requires local authorities to provide education for children who cannot attend education because of their medical condition*.

**Please note that for the purpose of this policy, the term 'medical condition' also refers to mental health conditions.*

When a child is already attending school, there are a range of circumstances where their health needs can and should be managed by the school so that they can continue to be educated there without the need for the intervention of the Council.

Home schools which are used in this policy to describe the school where the child is registered before they required alternative provision to be made under section 19, would usually provide support to children who are absent from school because of illness for a shorter period, for example when experiencing chicken pox or influenza. The 'Supporting pupils at school with medical conditions' guidance outlines the expectations for schools in this respect. Schools also need to be aware of their responsibilities when mental health issues are impacting on a child's attendance.

The Equalities Act states that School Governing Bodies must not discriminate against, harass or victimise disabled children and young people. Schools must make reasonable adjustments to ensure that disabled children and young people are not at a substantial disadvantage compared with their peers. This duty is anticipatory: adjustments must be planned and put in place in advance, to prevent that disadvantage. Children and young people should not require S19 provision to be made as a result of a school failing to make reasonable adjustments to meet their needs.

Section 7 of the 1996 Education Act states that parents/carers must ensure that children of compulsory school age receive efficient full-time education suitable to a) their age, ability and aptitude, and b) to any special educational needs they may have, either by regular attendance at school or otherwise. Section 19 provision should not be used for children and young people with high rates of school absence when this is not linked to a significant health need.

The Manchester context

Manchester Inclusion Strategy. Reducing exclusion from education and ensuring all Manchester's education settings are inclusive and able to meet the needs of their local communities are key priorities for Manchester City Council. The Manchester Inclusion Strategy was developed in 2019 to help the Council, and its partners work in a more

coherent and consistent way to support young people to attend school regularly and to reduce the risk of exclusion. The Inclusion Strategy Toolkit provides an outline of approaches, interventions and services to meet a wide range of needs in school and to support good attendance and prevent the use of exclusion from school for any reason wherever possible. Provide link to toolkit.

Manchester has a strong model of partnership and collaboration with the Manchester family of schools, and all partners are committed to improving outcomes for Manchester children. This partnership working has led to the development of a 3-tiered approach to inclusion, which sets out the support available to school at each tier and a shared understanding about effective use of alternative provision to meet the needs of pupils. All schools should have a graduated response to identifying and meeting a range of additional needs and use the support set out in our 3-tiered model of intervention when appropriate.

Information on the support and services provided in school and how to get help should be available to parents/carers and schools should work in partnership with parents/carers to put in place appropriate and timely support and/or intervention and keep this under review.

The Council commissions provision and all of our special schools and PRUs to provide support for mainstream schools and early years settings to ensure they can meet the needs of their pupils who are disabled, have medical conditions or have special educational needs. This includes support with developing accessibility and medical conditions policies and with writing individual healthcare plans as well as provision of training and advice.

In 2024 the Council, partner agencies and parents co-produced the Emotional barriers to school attendance pathway, which takes a prevention and early intervention approach to pupils not attending school due to anxiety. This sets out the strategies and approach schools should take at the earliest opportunity to support pupils when their emotional needs are impacting on school attendance. The guidance includes a list of reasonable adjustments which schools should consider using for children with EBSA including for example time limited part timetables or the use of remote learning to prevent the child from getting behind

School and Local Authority Responsibilities

School Responsibilities

- Schools should provide support for their pupils with medical needs under their statutory duties as set out in 'Supporting pupils with medical conditions at school' (DfE, 2014) and 'Arranging education for children who cannot attend school because of health needs' (DfE, 2023)

- Shorter term illnesses or chronic conditions are best met by school support and resources, some of which have been outlined in this document. Such conditions that might meet this definition include short term post-operative support and periods of reduced immunity. Where possible, schools should continue to provide education to children with health needs who can attend school, even if it's for some of the time.
- Schools must be aware of their responsibilities when mental health issues are impacting on a child's attendance.
- Under equalities legislation schools must consider whether they need to make any reasonable adjustments to provide suitable access for a child whose condition amounts to a disability.
- Schools should use the graduated response to assess, meet and review the needs of their pupils. When the pupil's medical condition becomes too complex, or the risks are too great to manage, the school should make a referral to a relevant outside agency for additional support.

Local Authority Responsibilities

- The Council will, in line with their Section 19 duty, arrange suitable full-time education (or as much education as the child's health condition allows) for children of compulsory school age who, because of illness, would otherwise not receive suitable education.
- The Council commissions a continuum of provision for children with health and mental health needs. This includes outreach support to schools, educational tuition, access to remote learning, AV1 robot and provision at Hospital Schools and Manchester Pupil Referral Unit.
- The Council has responsibility for promoting and protecting public physical and mental health and safeguarding children and young people.
- The Council will work with schools to set up an individually tailored reintegration plan for each child where a reasonable adjustment is required, and schools can request this support from the SEND QA Team.
- The Council does not need to become involved in such arrangements unless it has reason to believe that the education being provided by the school is unsuitable.

School and local authority responsibilities – exclusions

Manchester schools, Pupil Referral Units (PRUs) and the council work in close partnership to offer pupils and families early help to reduce the need for exclusion. The support available to schools to prevent exclusion is set out in our 3-tier model . However, there will

be circumstances where a head teacher considers an exclusion is the only course of action to be taken due to the nature of the event/incident.

Only a head teacher can exclude a pupil and must tell the pupil's parent or carer, in writing, how long the exclusion is for and the reasons for it. (For permanent exclusions or longer fixed term exclusions the school governing body will also consider the head teacher's decision to exclude). While they are excluded the pupil is not allowed to attend their school, enter the school grounds or use school transport services.

It is important that pupils continue to have access to learning during their exclusion so that they continue to make progress and achieve. Schools should provide work for the first 5 school days of any exclusion. Parents and carers are responsible for ensuring that their children are supervised during school hours on these days and complete the work which has been set. This will ensure that they will have the best chance to keep up with their learning and be less at risk of becoming involved in anti-social activities.

The school must notify the governing board and the Council of any permanent exclusion that would result in the pupil being excluded for a total of more than five school days (or more than ten lunchtimes) in a term or of any exclusion which would result in the pupil missing a public examination or national curriculum test. This should include a phone call to the Education Team and emailing form A of Manchester's permanent exclusion notification form within 24 hours to exclusions@manchester.gov.uk. Within 72 hours schools should provide further information about the pupil on part B of the notification form which should be emailed to the same inbox. It is crucial that this form is fully completed to facilitate the transition to the PRU and any further destinations. A lead officer from the Council will follow up all notifications of a permanent exclusions with a phone call to the school.

From the sixth day the school or Pupil Referral Unit must inform the parent or carer what arrangements have been made for full time supervised education until the end of the exclusion period.

Pupils who have been permanently excluded from their home school will receive their education from a Manchester Pupil Referral Unit (PRU). In the majority of circumstances this will not be a long term or permanent placement for the child or young person and it is expected that they will move onto to a new provision from the PRUs which may be another mainstream school or a special school if following assessment that is deemed to be the most appropriate option. The PRUs provide access to a balanced curriculum, small group teaching, specialist assessment and reintegration support to ensure that, wherever possible, pupils return quickly to mainstream schools. There are arrangements in place at the PRUs to support this transition to a new school. For some pupils it may be necessary

for the PRU to continue to provide education for a longer period. Pupils attending PRUs will be able to sit national tests such as SATs, GCSEs and other qualifications.

Notification

- The headteacher must inform the Council without delay of all school exclusions regardless of the length of the exclusion, in line with the Suspension and Permanent Exclusions Statutory Guidance and the Council's Exclusion Guidance.
- For a permanent exclusion, if the pupil lives outside the LA area in which the school is located, the headteacher must also notify the pupil's 'home authority' of the permanent exclusion and the reasons for it without delay.
- Notifications must include the reasons for the suspension or permanent exclusion and the duration of any suspension or, in the case of a permanent exclusion, the fact that it is permanent.

This provision will only be available for excluded pupils who reside in the Local Authority Area.

Medical and Illness Conditions

The guidance below outlines how local authorities and schools can best support children who cannot attend school because of physical or mental health needs. The guidance also covers the role that the child's home school (if they have one) should play in ensuring the child receives a suitable education when too unwell to attend school and, where appropriate, is successfully re-integrated back into their home school once they are well enough to be. This guidance also highlights the role the parents / carers and the child should play in agreeing suitable provision and on how and when a child could be reintegrated back into mainstream schooling (where relevant).

CYP may have health/medical needs which require support at any time whilst they are in education. These may be both short and long-term physical health needs or mental health needs; and there is a range of circumstances where their health needs can and should be managed by the school so that they can continue to be educated there without the need for the intervention of the Council.

The NHS has produced helpful guidance on when a child may be too ill to attend school - <https://www.nhs.uk/live-well/is-my-child-too-ill-for-school/>

CYP with medical conditions should be properly supported so that they have full access to education. Governing bodies must ensure that arrangements are in place in schools to

support pupils at school with medical conditions in accordance with the ‘Supporting pupils at school with medical conditions’ Statutory Guidance 2023.

This includes having clear school policies for supporting pupils with medical conditions and ensuring these pupils can access and enjoy the same opportunities at school as any other child. Schools also need to be aware of their responsibility to support mental health needs, many of our schools have school mental health teams and all of our schools can access M Thrive which is a community based service that provides emotional wellbeing and mental health support for children and young people aged 5 to 18 and up to 25 for those with SEND.

Parents also have a vital role to play, and schools should have a publicly accessible policy that sets out how schools will support children with health needs including a named person who can be contacted by the Council and by parents. Regular communication should be maintained between a named member of school, the child, and parents/carers to promote engagement and welfare, monitor progress and any safeguarding concerns. Schools should also ensure that children and young people and their parents/carers successfully remain in touch through school newsletters, emails, and invitations to school events.

There will be a wide range of circumstances where a child has a health need but will receive suitable education that meets their needs without the intervention of the Council – for example, where the child can still attend school with some support; where the school has made arrangements to deliver suitable education outside of school for the child; In these cases, the Council would not need to arrange any additional education, provided it is satisfied that the child is receiving suitable education.

For children and young people who are experiencing emotional barriers to attending school, schools should follow the guidance set out in Manchester’s Emotional barriers to School attendance (EBSA) and use the Planning for Change toolkit. The guidance outlines an approach which is proactive and enables schools to respond swiftly when there are early indications of EBSA to prevent escalation.

Support for families and schools

The school should develop good support for pupils with physical or mental health conditions and the sharing of information between schools, health services and the Council is important. For example, by making reasonable adjustments where a pupil is struggling to attend school full time, has a disability or putting in place an individual healthcare plan where needed. The setting should also consider whether additional support from external partners (including the Council or health services) would be

appropriate and, if necessary, make referrals in a timely manner and work together with those services to deliver any subsequent support. Schools can also play a big part in making sure that the provision offered to the child is as effective as possible and that the child can be reintegrated back into school successfully.

Schools should work with professionals and make full use of the available services which can provide advice and guidance to support children to remain in school such as:

Links to Manchester documents/ Manchester model and services referred to in the policy

- Supporting pupils with a medical condition:
https://www.manchester.gov.uk/schoolhub/downloads/file/35/supporting_pupils_with_medical_conditions_policy
- Manchester Inclusion Strategy and toolkit:
[Manchester Inclusion Strategy](#)
- M Thrive:
[Manchester, Trafford & Salford Thrive Hubs - MFT CAMHS](#)
- Manchester Secondary Pupil Referral Unit:
<https://www.manchesterlearningpartnership.co.uk/page/secondary-outreach/118469>
- Bridgelea School:
<https://www.manchesterlearningpartnership.co.uk/page/support-for-primary-schools/118468>
- Lancasterian Outreach and Inclusion Service:
[Lancasterian School: About: Outreach and Inclusion Service](#)
- Manchester City Council Admissions Team:
school.admissions@manchester.gov.uk
- Manchester CAMHS:
<https://mft.nhs.uk/rmch/services/camhs/>
- Manchester Hospital School:
[Manchester Hospital School](#)

Other useful services

Early Help Assessment with the family and ensure regular reviews are in place to support the child while absent from school. [Service Listings | Help & Support Manchester](#)

The Emotional Barriers to School Attendance guidance and toolkit:

[Emotional Barriers to School Attendance \(previously Anxiety Based School Avoidance\) | Help & Support Manchester](#)

Specialist SEND Support Services e.g. Educational Psychology Service (EPS), Pupil and School Support (PSS), Communication and Autism Team (CAT), Physical Difficulties Support Service (PDSS) [Service Listings | Help & Support Manchester](#)

Schools can also contact the Council's Education Attendance Team which provides support and advice to schools and other services where there are concerns about pupil attendance in conjunction with the DfE's working together to improve school attendance guidance.. school.attendance@manchester.gov.uk

Social Care - [Social services | Manchester City Council](#)

When it is clear after the interventions above that the school can no longer support the child's health needs and provide suitable education, the school must notify the Council by making a referral to the School Admission Team for additional support.

School Register

If a child is unable to attend school because of health needs, they must not be removed from the school register unless the child meets one of the deletion category regulations, even if the Council has become responsible for the child's education. Continuity is important for children and knowing that they can return to their familiar surroundings and school friends can help their recovery and their educational progress.

Where a child is not on a school roll, a School Admissions Officer will contact the family and other agencies involved with the child (such as health/social care) to promote an application for a school place in the first instance. If all professionals involved with the child feel that the child's needs mean that they should be considered under Section 19, the lead professional who is presenting this issue, is responsible for gathering the appropriate evidence and presenting the referral to the Section 19.

Evidence of Medical Needs

The Council will need to be provided with evidence of the child's medical needs and the impact on their ability to access education. The medical evidence should be provided by a clinical specialist such as a consultant.

The Council will work closely with medical professionals, the school and the child's family, to obtain and consider medical evidence. Where specific medical evidence, such as that provided by a medical consultant, is not quickly available, the Council will consider evidence from other medical professionals, such as the child's GP.

Once appropriate medical evidence has been provided, the Council will only seek continuing evidence where this is necessary.

Notification

The child's school has a duty for all children of compulsory school age, under regulation 13(9)(a) of the School Attendance (Pupil Registration) (England) Regulations 2024 to make a sickness return and inform the Council's attendance team of any child recorded as absent due to illness where there has been (or there is reason to believe the child will have) at least 15 days cumulative or consecutive in an academic school year.

The full name and address of any pupils of compulsory school age who are not attending school regularly (including due to their health needs) must be submitted to the Attendance Team.

Where the school or other educational setting or parent/carer believe that the child could be eligible for education provided by the council via section 19 duties, they must notify the Council via email and request a Section 19 referral form.

This notification must include:

- The child's details – name, date of birth, UPN.
- The parent/carer's details.
- Details of the child's medical needs including any supporting medical evidence
- Details of any SEND including whether they have an EHCP.
- Details (where relevant) if currently open to social care.
- The educational provision and support that has been in place to date.
- Whether any current or previous provision has been in place?
- What reasonable adjustments have been made

On completion and submission, the case will go to panel for a decision.

The Panel meets every two weeks during term time and is chaired by the headteacher of Manchester Hospital school. The panel includes school leaders from mainstream

secondary and primary schools as well as senior Council officers and representation from Health Services.

The Panel will carefully consider the referral and determine whether its duty to secure suitable S19 provision has been met. A decision will be communicated to the school (or the main referrer) following the scheduled panel date.

In line with the Section 19 duty, the Council will arrange suitable fulltime education (or as much education as the child's health condition allows) for children of compulsory school age who, because of illness, would otherwise not receive suitable education. This applies whether or not the child is on the register of a school and whatever the type of school they attend. It applies to children who are pupils in Academies, Free Schools, special schools and independent schools as well as those in maintained schools.

This provision will only be available for pupils who reside in the Local Authority Area.

Children with Education Health & Care Plans

If a CYP with an EHCP experiences health difficulties which impact their attendance, their setting should involve appropriate external professionals who can provide advice and support to settings such as:

- SEND advisory teams e.g. Special Education Need Information & Advisory Service (Sendias)
- Educational Psychology Service (EPS).
- Health Services e.g. School Nursing, Speech & Language Services.
- Social Care.

Referrals to appropriate external professionals must be made in a timely manner and the school must work together with those services to deliver any subsequent support. The setting must also inform the CYP EHCP Coordinator within the EHCP Team who can support and advise the setting.

Schools must request an early annual review where there has been a change in the CYP's needs and the provision they require. If a child of compulsory school age with an EHCP is unable to access their educational setting due to illness for 15 days or more,

whether consecutive or cumulative, their educational setting must notify the Council's school attendance Team and the EHCP Coordinator.

Any arrangements for provision will need to be done in consultation with EHCP Team considering the child's identified SEND and the special educational provision they require as outlined in their EHCP.

Arranging S19 Provision

Children unable to attend school because of health needs should be able to access suitable and flexible education appropriate to their needs. The nature of the provision must be responsive to the demands of what may be a changing health status. Where the panel has identified that provision is required, it will be arranged as quickly as possible through Manchester Hospital school, which has been commissioned by the Council to meet the section 19 duty for children and young people unable to attend school due to health reasons. There are a range of pathways provided by Manchester Hospital school to fulfil this duty and the pathway allocated will depend in the age and needs of the child or young person.

The provision will be a short term provision and will aim to ensure that:

- Pupils make good progress in their education and do not fall behind their peers.
- Disruption to learning is minimised and there is a continuity of education provision within the school curriculum.
- Where appropriate for example for pupils in year 11, pupils can obtain qualifications as appropriate to their age and abilities.
- Pupils can reintegrate successfully back into school and that this takes place as soon as their health permits.
- Pupils feel fully part of their school community and can stay in contact with their peers.

The provision should be full-time. "Full-time education" is not defined in law, but it should equate to what the pupil would normally have in school - for example, for pupils in Key Stage 4 full-time education in a school would usually be 25 hours a week.

If provision is delivered by one-to-one tuition, for example, the hours of provision could be fewer as the provision is more concentrated. It may not be in the child's best interests to receive full time provision for reasons which relate to their physical or mental health. In these cases, the provider will arrange part-time provision on a basis it considers to be in the child's best interests in consultation with the child's parents/carers, educational setting, and medical professionals.

The provision must be reviewed on at least a half-termly basis to ensure this remains suitable for the child. This is the responsibility of the section 19 provider who has been commissioned or the home school which made a referral to the S19 provision.

Where provision through Manchester Hospital School is not deemed an appropriate provision for whatever reason, the Council may make alternative arrangements. This may include:

- Outreach support through a specialist setting – Such as Manchester Hospital School
- A mentor to work directly with the CYP and or the Home School
- EP support to work with the Home School
- Advice & Guidance from Manchester Hospital School
- Recommended providers from Manchester Inclusive Alternative Provision (MIAPS) Framework for the homeschool to commission support from

Funding Provision – Medical need

Funding provision for children with medical needs is funded from the Councils high needs budget. However, where a child remains on the register of their home school but requires a longer-term period in provision due to their health needs, the Council and home school will transfer a portion of the school's funding associated with that child to the provision. This ensures that the funding supports the child. This arrangement would cease when the child is reintegrated back to their home school.

When a child permanently leaves the roll of their home school and is admitted to another school or provision, a mandatory funding adjustment is made by the Council.

Reintegration back into the Home School

The plans for the longer-term outcome and the next steps in a pupil's education will be agreed at the start of the commissioned support, intervention or provision, according to the statutory guidance for Alternative Provision (2025). Home schools should maintain contact with their pupil and receive regular information from Manchester Hospital school regarding the pupil's progress throughout their placement.

The expectation is that the majority of pupils will be reintegrated into their home school. Progress towards this will be discussed at reviews which should be attended by the Home School. Where reintegration to school is the objective, staff from the Council, the Hospital school and the home school will work together with the family to assess when the child is ready to return to school and to support reintegration.

The aim is that all children will be reintegrated within 6-12 weeks. Section 19 is an intervention and will not be agreed as a long-term destination

On return to their home school each child should have an individual healthcare plan and/or individual provision plan which specifies the arrangements for the reintegration and may include reasonable adjustments and extra support the school and/or other services will provide. Where appropriate, transition back to the child or young person's Home School will be supported through a transition period agreed with the Hospital School.

In cases where a child was not on the register of a school when becoming ill, the Council will consult with the family on finding a new suitable placement when they are ready to return to the mainstream. Applications will be referred to In year Fair Access for a school place to be identified.

The Panel must balance all requests for S19 against the information presented and available resources.

Where Section 19 provision has not been agreed by the panel due to procedural error or irregularity, the parent may refer the case to the **Local Government Ombudsman**:

Local Government Ombudsman

PO Box 4771

CV4 0EH

Telephone: 0300 061 0614 (local call charge from a landline or mobile)

Text: 0762 480 4299

Fax 024 7682 0001

Alternatively, you can email it to www.lgo.org.uk/making-a-complaint

The panel will only accept a further referral if there is new, significant supporting information which may change the initial decision that was made.

This policy will be reviewed by MCC when there is a change in national guidance or every three years.