



The voice of specialist further education



High needs and AP funding call for evidence

Natspec Response – Final for submission

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Introduction

1. Natspec is the membership association for organisations which offer specialist further education and training for students with learning difficulties and disabilities, in particular those funded through the high needs funding system. Our vision is that all young people with learning difficulties or disabilities can access quality education and training which supports their aspirations for skills, work and life. Our members are funded by the Education and Skills Funding Agency (ESFA) and local authority (LA) high needs budgets, and provide multi-disciplinary specialist support and expertise enabling students aged 16 to 25 to make a successful transition to adult life.
2. The purpose of the call to evidence is to understand how existing funding is used, not about how much funding is needed. This response from Natspec focuses on Sections 5 (Further Education), 6 (early intervention for Preparing for Adulthood), 7 (Partnerships) and 8 (Other).
3. We also comment on questions within the section on schools relating to LA policies on EHC plans, and the section on alternative provision (AP) relating to some specialist colleges being asked to be AP providers by LAs.

Question 11. If you are responding on behalf of a school, do you have a clear understanding about what provision is “ordinarily available” to meet pupils’ special educational needs in your school?

4. Natspec is concerned with further education (FE) and its members are colleges rather than schools. Although directed at respondents from schools, this question is also relevant to the FE sector and we have therefore provided a number of points. There is no common understanding or national guidance on universal or ‘ordinary’ provision in terms of FE, and different LAs have very different expectations of mainstream colleges in relation to what they should provide.
5. Natspec recommends that national guidance is produced to articulate provision that should (and should not) be expected to be included within the limits of the core 16-19 funding formula.
6. LAs often do not recognise or understand that colleges do not receive an additional £6k or ‘notional SEN budget’ in the same way as schools. The additional disadvantage factors in the 16-19 funding formula do not stretch to £6k per student, and the disadvantage fund is not adequate to provide for students with up to £6k of additional needs. The disadvantage block has multiple calls on it, often funding the significant number of young people who are re-taking GCSE English and maths, and should be increased.

Question 14. Does your local authority make it clear when a child or young person requires an education, health and care (EHC) plan?

7. LAs’ policies are often unclear and there is little or no consistency between them. Published policies are often difficult to find and Local Offer websites lack detail, particularly relating to post-16 options, and there is even less information relating to what is available for those aged 19+.
8. Parents have been advised verbally of policies that appear to contravene the Code of Practice. For example, some have been told that EHC plans will not be issued for:

- anything other than classroom-based learning
 - particular types of SEN (rather than individual need)
 - support other than one-to-one learning support.
9. It would be helpful and save unnecessary stress, anxiety and resources (e.g. by avoiding costly tribunals) if there was greater accountability to deter LAs from refusing EHC needs assessments in contravention of the SEND Code of Practice. Natspec would welcome clear guidance so that colleges can work with LAs before they make very late decisions affecting students only weeks or days before they are due to start a new term.
10. Equally lacking in clarity and consistency are LA policies on when a plan should be ceased. This is an area of particular concern in FE, as learners turn 19. Plans are increasingly being ceased with little or no warning, and we have examples of students who have been told their plan is ceasing late in the summer term when they were expecting to continue their course at college in September – even when the LA had not been present at the EHC review.

Question 17. How could we encourage more collaboration between local authorities, schools and providers to plan and fund local AP and early intervention support?

11. A small number of specialist colleges which are being asked to consider AP for those aged 14-16 who have been excluded or home-educated. LAs do not appear to be aware that ESFA have written to specialist colleges and Independent Learning Providers advising them that this provision is unlawful unless they have a separate registration as an independent school.
12. A more strategic and forward-planning approach to intervention is required, as these requests are sometimes made at the point of crisis. There may be a number of ways that specialist colleges could support AP or 14-16 provision in mainstream colleges, rather than having them on roll, and it would be more cost-effective and beneficial to all concerned if LAs routinely include both mainstream and specialist colleges when planning for AP.

Question 18. What changes could be made to improve the way that the AP budget is spent, to better enable local authorities, schools and providers to use the local AP budget to provide high quality AP, intervene early to support children at risk of exclusion from school, or reintegrate pupils in AP back into mainstream where appropriate?

13. We support the suggestion made by the Association of Colleges that a panel made up of local school and college providers could provide a more joined-up preventative, strategic approach to address the needs of individual students before they face exclusion. As stated above, this should also include specialist FE providers with expertise in the cohort that could be used to support the mainstream providers. Like AoC, Natspec does not support suggestions for new or additional post-16 AP that is separate from the existing infrastructure of mainstream and specialist colleges. Natspec also supports the call for post-16 funding levels for these young people to be the same as pre-16 levels.

Question 20. Are there aspects of the operation of the funding system that prevent young people from accessing the support they need to prepare them for adult life?

14. There are many aspects of the funding system that present challenges, and the majority of the issues that we have raised in [previous consultations regarding the HN funding system](#) remain.

- **Inequity of FE funding:** FE students funded via the High Needs system are treated differently and inequitably from their peers, who are all funded via a national funding system. Therefore, whilst high needs students are constrained by their LA policies, and restricted in their movement and their choices, their non-disabled peers are able to travel out of area without question, to choose the provision that best meets their needs and aspirations. The system leads to a postcode lottery of support, undermining the integrity of the Code of Practice by preventing young people and families accessing a fair system, irrespective of where they live. This is inconsistent with the ambitions of the legislation which focussed on putting the learner first, with choice and aspiration at the heart of the process. A national system with more consistency would create cost savings through reduced duplication, more equitable decision making, reduced bureaucracy and fewer appeals and tribunals.
- **Additional administrative burden:** Specialist colleges work with an average of 18 local authorities, with some dealing with over 50. Colleges working with multiple LAs have to deal with inconsistent and time-consuming paperwork, which has created an unfunded administrative burden for colleges. The amount of staff time required to administer the different requests and procedures set by councils is substantial: responses from Natspec members indicate that 84% of them have had to employ at least one member of staff as a result of the localised funding system. One large specialist college has had to employ 15 administrative, QA, HR and finance staff, at a cost of over £300,000. Those that have not taken on additional staff are placing additional burdens on existing staff: "We need to recruit more staff; however, we do not have the finance to do this. Existing staff are completing funding and admissions documentation... Lead tutors are drawn into working well over and above their teaching/management and other duties to ensure that pre-advice, post-advice and any additional reviews/EHCP reviews are administered and attended to."
- **Multiple monitoring visits** by different LAs are particularly time-consuming and wasteful, when specialist colleges are subject to inspection by Ofsted, and frequently also by CQC, and have already had to supply the same information to ESFA to be compliant with their main national funding contract.
- **Late payments:** Additional staff employed by colleges are often used to chase payments and collect debt from local authorities. Ten colleges have told us that they are owed over £500,000 by councils for students in 2018/19 and one college is owed £1m. Carrying these debts is unsustainable and for some smaller colleges, threatens their viability. It can also have a direct effect on the education of students if staff contracts are terminated as a result of unfunded provision.
- **Late decisions and disrupted education:** Late decisions regarding placements or late contracts result in stress for families, debt for colleges, and uncertainty for staff.

Recruitment of staff is one of the biggest issues that arises from late decisions, as colleges have to decide to either release staff from their contracts/make redundancies or keep them on with the risk that students will not be placed. Those that decide on the former sometimes then have to re-recruit staff or spend even more on costly recruitment of temporary or agency staff to work with students who are placed late, instead of more effective forward planning. 70% of Natspec colleges have reported that some of their students who joined the college this year have had their education disrupted as a result of the funding system. Examples include:

- delays due to social care and education officers working to different timescales
 - students arriving at college in October or January, having had to wait for tribunal dates. One family took out a bank loan to self-fund the first term for their son, as the decision had not been made regarding placement prior to the summer break, to ensure that he was able to start in September with his peer group
 - one college reported that 20 students started late (representing over 50% of their intake), because placements had failed elsewhere or they had become NEET waiting for decisions
 - colleges having to pay agency staff because decisions are not confirmed in time to recruit full-time staff, compounding the financial impact
 - many students, having arrived at college, remain uncertain as to whether they will be allowed to finish their course. One college reports that 112 out of 144 current students have not had their places confirmed for next year, demonstrating the inequity for high needs students, as this lack of certainty would almost never occur for students who are not funded under the high needs system.
 - estimates of the financial impact on colleges of late starts range from £20,000 to over £250k.
- **Procurement frameworks:** despite DfE guidance advising LAs that SEND placements should not be subject to the Public Contracts Regulations, specialist colleges are continuing to be asked by LAs to join frameworks leading to unnecessary and costly bureaucracy. One college told us that it took two days to complete the paperwork required to join the framework, with no apparent benefit to any of the parties involved. Despite the high costs involved in setting up such systems, many placements are still made "off framework", with some not being used at all, except in crisis cases.
 - **School to college and preparing for adulthood:** some schools are being granted exceptional approval to retain students past the age of 19, whilst others are being encouraged to open post-19 centres, and we have examples of parents being told by their local authority that they must keep their young person at school, and that vocational courses at specialist colleges are not an option for them. It is not cost-effective to open new school-based provision when there is capacity and greater choice in the FE sector to meet the needs of these young people. Furthermore, approving all these small providers means opportunities for economies of scale are lost, as learners are spread more thinly across a greater number of organisations. It is also very difficult for smaller school-based post-19 centres to offer the same range of vocational or independence options that existing specialist or mainstream colleges can provide,

reducing economies of scale further and working against the principles of preparing for adulthood. There should be a marked difference between school and post-school settings, with the focus on an adult learning environment, with age appropriate high-quality provision with a philosophy and curriculum based on preparing for adulthood.

- **Transport costs:** lack of resources for LAs is resulting in an increasing number of LAs asking parents to pay the cost of transport to college. This has a direct effect on the ability of the young person to attend and has in some cases resulted in them not receiving their education. In line with the ambitions of the legislation relating to all children and young people aged 0 to 25, we believe that pre and post-16 students with EHC plans should have equality of access to transport without this discrepancy in levels of funding.
- **Destinations:** there are difficulties securing appropriate destinations, with colleges reporting a lack of resources for transition planning, poor communication with social care or housing organisations, or employers not being trained or ready to provide appropriate jobs. This means that there is a danger that money invested in the education of young people could be wasted if they do not then get the chance to exercise the skills they have developed once they leave college. There are also particular issues relating to the benefits system which need resolving, with families sometimes reluctant to encourage their young people to take jobs that are offered to them.

Question 21. Notwithstanding your views about the sufficiency of funding, please describe any other aspects of the financial and funding arrangements that you think could be amended to improve the delivery of provision for young people with SEN.

15. We suggest the following changes to the funding arrangements:

a) Universal or specialist? There is a need for clear guidance to define universal provision, and for longer-term strategic planning for low incidence and/or complex SEN, backed up by demographic and trend research, and a mechanism for funding this at regional or national level. A common understanding between LAs and providers about how best to meet the needs of the small number who require specialist expertise that it is not cost-effective to provide in every local area, would address many of the current inefficiencies. It would help avoid costly disputes, tribunals, late placements, late starts, disrupted education and allow specialist colleges to forward plan their recruitment, creating further cost savings.

b) Research long term value. Further return on investment studies, with an agreed methodology between funding agencies and providers, should be undertaken to calculate the long-term economic and social value of the outcomes achieved for this group. This would provide an update to the 2011 National Audit Office study and evidence to support the guidance suggested above.

c) More careful investment to avoid duplication/extend regulation. A lack of strategic planning for new provision is creating dilution of specialism and is a false economy in the longer term. The number of SPIs has risen from fewer than 60 in 2012 to [115 in 2019](#), with a further 7 having been approved by ESFA for entry in September 2019. New post-16 centres have extensive set-up costs, sometimes require capital funding, have significant staff training needs and stretch Ofsted resources through additional inspections.

Where they are opened following a thorough strategic review, supply and demand analysis and consultation with existing FE providers, they can be successful and there are examples of this good practice, but too often LAs are encouraging schools or social care providers to open colleges without a full options analysis or a thorough understanding of the consequences of opening new provision. The focus for funding should instead be on improving existing quality and workforce development, with new provision opened only where geographical gaps cannot be addressed through outreach and partnership work.

d) An extension of regulation so that all organisations that provide specialist post-school education are identified and monitored, not just those providers directly funded by the ESFA, would also be helpful.

e) Workforce development. National investment into centres of specialist expertise would support local provision and would be a more cost-efficient alternative to opening new SPIs, which each need to invest individually in training to keep themselves abreast of latest research and effective practice. National specialist centres would also help to halt the decline in qualified specialist teachers, giving them an opportunity to network and upskill through mutual support and training. The centres would act as central “hubs”, enabling specialists to come together and maintain and develop their expertise in particular types of SEN, and/or undertake innovative research. The centres would also reach out and develop training and education programmes to upskill the workforce and support local and mainstream providers.

f) A voice for post-16 locally. The operation of the schools forum is not an appropriate mechanism for determining funding across a 0-25 SEND system. Fewer than 5% of Natspec members responding to our survey had any input into their local forum, and college representatives are always heavily outnumbered by schools. The schools forum is unrepresentative of post-16 and members often have little or no knowledge of the issues affecting the post-school sector; there is no protection for post-16 within the high needs budget. We suggest that schools forums should be disbanded, significantly re-shaped and re-named so that they can become strategic planning bodies, with a proportion of the HN budget ring-fenced for post-school provision.

e) Standardisation of policies and paperwork. To address the additional administrative and staffing burdens on colleges caused by the localised system, the work currently being undertaken by the Special Interest Group of DfE, LGA, NASS, Natspec and LA/provider representatives should be accelerated. Five years after this issue was first raised, there is now an urgent need to provide to LAs, standardised fee templates and contractual requirements, and clear guidance on much greater co-ordination of monitoring visits between funding and regulatory agencies. A standardised EHC plan template with requirements to follow central guidance would contribute to reducing inconsistencies across LAs and the amount of administrative time producing, interpreting and reviewing plans. This in turn would lead to both financial savings and a likely improvement in the quality of plans.

f) More effective transition planning. Planning for transition, both to enter college and to leave college, is ineffective because the funding system makes it difficult for college staff to liaise in a timely manner with schools and other agencies. Reduced resources for LAs have resulted in LA staff not being able to attend reviews, and sometimes ceasing plans at short notice with little or no reference to the most recent review. We ask that the Department for Education reduces the number of exceptional approvals given to schools to

retain students past the age of 19, and introduces tighter controls on establishing new provision that emerges from schools to ensure they are not an extension of the school provision.

Question 22. If you are able to provide any examples where local authorities and colleges have worked together effectively to plan provision to meet the needs for SEN support and high needs, please describe these below.

16. The latest Natspec survey identifies some examples:

- **Joint commissioning:** Colleges report that where people are positive and engaged, resolutions to funding problems can be found. One college said that positive solutions are found “where health, social care and education are open to discussion on a placement and outcomes, especially with young people with complex disabilities who would be difficult to place. It's the people involved rather than following the process that makes this successful. It works best and is a lot easier when health and social care ‘buy in’.” Another college mentioned that through communication and proactive multi-agency involvement, a young person with a degenerative condition was placed much quicker than anticipated. A third college gave an example of an LA in the north west which routinely invites specialist providers to meetings, proposing placements one year ahead, promoting trust and enabling effective forward planning.
- **Transition:** Again, the best examples include local authority representatives who are actively engaged in the review process: “This meant that SEN progress was understood and places were confirmed as a result.” Other examples include:
 - “One LA was flexible and willing to look at alternative options when trying to accommodate the transition out of college for one young person in order that the desired outcome was achieved”.
 - “Reviews and multi-professional meetings which are actively attended by LAs do tend to run far smoother due to the understanding of required outcomes and the individual young person”
 - “Where necessary we work with existing providers during transition, e.g. visiting a residential and/or education placement with staff who will be working with the young person - familiarisation and getting to know each other. We have had staff stay residential (at our expense) at another provider during transition.”
 - “Some LAs are genuinely interested in transitioning students, to ensure that the processes are smooth and in the students’ best interest, rather than just doing it the cheapest way possible. This results in more successful transitions and is cost-effective in the long run”.
- **Specialist colleges working with mainstream colleges.** There are many examples of specialist and mainstream colleges working together, but these partnerships tend to occur based on personal relationships rather than encouraged by the system. One college gave this example: “We have always worked in partnership with our neighbouring mainstream college and this does provide a level of flexibility when we are planning programmes. We haven't got to the stage where both colleges are named on the EHCP though, so there is always the risk that we will be left with responsibility for

the students if something goes wrong. On balance though, the arrangement works well and the local authority likes it.”

- **Specialist colleges working with feeder schools.** Some colleges have retained link placements for pre-16 students, although these are not as easy or as common as they have been in previous years. Other colleges report active programmes working closely with local feeder schools and other external organisations to improve outcomes.
- **Partnerships with LAs and others:** Linkage College was able to open a new campus as a result of an effective and collaborative partnership with the county council and Heritage Lottery Fund.
- **Invest to save:** National Star College, The Orpheus Centre and the Seashell Trust have all commissioned independent return on investment studies that show that for every £1 spent on their provision there is a higher return in either savings or increased economic activity as a result. These examples are available to share if required.

Question 23. Are the current funding or financial arrangements making early intervention and prevention more difficult to deliver, causing costs to escalate?

17. The impact of the current funding and financial arrangements on early intervention and prevention depends on individual circumstances. It would be more accurate to consider when interventions would be *timely*, rather than assuming that *early* intervention will always be a benefit. Judging when intervention is timely for the child or young person requires experience, expertise and an individualised approach rather than blanket policies regarding transition. There are examples of young people who would have progressed more quickly at college, and would not have needed so much support on arrival, if they had received a different type of support at school. However, the function of schools is very different from that of colleges, and it would not be appropriate for schools to be asked to change their core function or provide an adult education which is primarily focussed on independence or employment. Differences in when a young person goes through puberty or the time at which they are ready to experience and learn to manage risk, a critical element of learning, means that they often need time in college to achieve goals that they would not have been ready to work towards at an earlier stage.
18. For many young people, learning at a slower pace than their non-disabled peers is a fundamental feature of their SEN. Early intervention, therefore, should not be seen as a means of reducing time spent in education, rather it should be viewed as a means of maximising progress and the impact of the education and training the young people receive. It is our belief that almost all young people benefit from a period of post-school further education as part of their preparation for adult life.
19. Effective and sufficient investment in further education would result in colleges being able to support young people more effectively, resulting in young people achieving greater independence throughout adult life, saving the public purse in the future, for example in terms of health and social care, and reliance on benefits.
20. Currently, it is the education department within the local authority which makes the investment with the return seen by a different department, e.g. adult social care, or by another national department of government, e.g. DWP. It would be helpful if there was an

LA-wide or even government-wide consideration of return on investment that encouraged this longer-term, broader view, and a mechanism for local authorities to enable them to offset the short term expenditure on education against the longer term savings to health and social care budgets. A means by which LAs could combine their budgets at regional or sub-national level to secure provision for the small numbers of young people requiring highly specialised provision would also be beneficial.

Question 24. If you can you provide examples of invest-to-save approaches with evidence that they can provide value for money by reducing the costs of SEN support, SEN provision or other support costs (e.g. health or social care) later, please describe these below.

21. Examples of studies from National Star, The Seashell Trust, and the Orpheus Centre demonstrate the savings for health and social care that result from effective investment in further education. These can be made available if required.
22. We urge DfE not to use examples of invest-to-save approaches from schools as a reason to reduce or prevent access to post-school education; there is evidence that LAs are ceasing EHCPs as young people leave school or after only one year in college, citing lack of progress even before progress reviews have taken place.
23. Ceasing EHCPs early, particularly at short notice or just before the start of the summer holidays, is a false economy and causes unnecessary stress and anxiety, leading to young people not meeting their aspirations, and increased costs for the LA later on, for example through increasing numbers of appeals/tribunals or increased health and social care costs.

Question 25. If you think there are particular transition points at which it would be more effective to access resources, please indicate below those you believe would be most effective to focus on.

24. School-college transition has become more difficult with the HN funding system, as schools benefit financially from keeping young people in school. There is a perverse incentive for schools to hold onto learners, even when they would benefit from moving on to a more adult-orientated environment.
25. The funding system should facilitate school-college link schemes to enable young people to have an experience of college sooner. Currently the number of link schemes is reducing rather than increasing due to the complexities involved under the current financial arrangements and the incentives to schools for young people to continue in the same setting.
26. The transition from college to employment, independent living, supported living or adult social care is particularly problematic at present due to the huge pressure on LA budgets and lack of options for students ready to finish their education. Some LAs are actually funding a fourth year at college, for example one young person had chosen where he wanted to live and had been offered suitable employment, but could not take this up because the adult social care package to support him was not in place. The LA consequently funded a further year at college which would not have been necessary, had the social care package been in place.

27. As mentioned previously, transitions to work are also difficult if families feel that they will lose money from the benefits system.

Question 26. Please describe as briefly as possible below changes that you think could be made to the funding system nationally and/or locally that would foster more effective collaborative approaches and partnership arrangements.

28. In addition to the suggestions we have made in response to Question 21, the following changes would be helpful:

- For LAs to universally and routinely recognise the place of specialist colleges within the Local Offer and include them in planning meetings alongside other providers as part of a mixed economy of provision. Analysis in 2018 showed that only 19 of 48 LAs that had a specialist college in their local area included details of this college on their Local Offer.
- It would be easier for mainstream and specialist colleges to form partnerships and create joint programmes (to the benefit of the learner and potentially better value for money) if they were both subject to the same lagged funding system for HN, as is currently the case for specialist colleges.
- Using Ofsted and ESFA inspection and monitoring outcomes rather than individual monitoring visits by multiple LAs would also save significant time and resource for both LAs and colleges.
- Joint forward planning by LAs, involving all post-16 providers, including specialist colleges serving their area, would facilitate agreement on placements and avoid the need for costly failed placements, appeals and tribunals.
- Regional strategic planning and a mechanism for funding higher cost specialist placements at regional or national level would reduce pressure on individual LA high needs budgets for the very small number of young people post-16 or post-19 who require highly specialised provision that would not be efficient or effective to duplicate in every local area. We estimate that there are fewer than 4,000 young people who require this highly specialist post-school provision, and there would be a significant financial and human benefit if less than 4% of the current high needs budget was ring-fenced nationally for this purpose.

29. It should also be noted that more effective collaborative approaches and partnerships were one of the desired outcomes of the £23m that was invested in the strategic planning fund by the Department for Education in 2016-17, when all LAs were asked to create a SEND strategy involving the full range of partner providers, including those that they might place learners outside the local area. We note that there has been no analysis of the value of this fund, and no comprehensive evaluation of the resulting plans that were produced. We suggested at the time that a proportion of this funding should be used to focus on post-16 and post-19, and also to examine the value of cross-border working with regional and national specialist providers. We are not aware that any such work took place. If there are examples of good strategies that have resulted in better collaboration, they have not been widely promoted to the FE sector. We suggest that a comprehensive evaluation of the use of this funding is undertaken, to ascertain whether or not effective changes were made as an outcome of the strategic reviews and to what extent the plans were made in conjunction

with communities and the full range of providers. We further suggest that, should additional funds be made available to support partnership working, it is used at wider than local level, and should be ringfenced, with clear guidance on the government's expectations of the activity that LAs should engage in to address the fundamental problems created by each local area making their own individual decisions.

Question 27. Are there any aspects of the funding and financial arrangements, not covered in your previous responses, that are creating perverse incentives?

30. The funding system results in discrimination particularly against the following groups:

- Families who are unable to make their case either due to low income or where parents have SEN or are otherwise disadvantaged
- PMLD cohort/those with the most complex needs who are sometimes being treated as ineducable after the age of 19, with funding focused on those who are capable of employment
- Students with sensory impairments e.g. fewer young people with visual impairments are getting EHC assessment.
- Those with moderate learning difficulties or who are on the borderline of needing a specialist place; some who request a specialist college place are being referred to GFE colleges, but then their placement later breaks down.
- SEMH students, who are currently underfunded and at risk of exclusion or off-rolling from mainstream providers, are not given the same level of funding at college as they have had previously if placed in AP or special school.
- Students who request a residential place but are given day places instead – many face 3 or 4 hours in a taxi each day and lose valuable learning time; sometimes a 4 day residential place would be less than the cost of transport.

31. The stage 2 consultation on the high needs funding formula in 2017 promised that research would be undertaken to consider what needs to be done "to protect and fund national and regional centres of specialist provision and expertise, including provision for those with the most complex needs". Over 2½ years later, these specialist centres are unfunded and unprotected. The pressure on budgets, the lack of long term planning, localised decision making and dilution of scarce resources instead of strategic investment has resulted in regional and national centres of specialism becoming increasingly at risk of closure, staff expertise and experience being lost, and the most vulnerable learners at risk of having their education disrupted or curtailed unnecessarily. There is now an urgent need for strategic regional and national investment to address these issues.