

## COVER LETTER TO EDUCATION OTHERWISE CONSULTATION SUBMISSION

*nb please note that EO also responded via online questionnaire response identifier 990*

Please find attached the consultation submission from Education Otherwise, comprising Overview, revised draft guidance and a copy of a letter from Lord Adonis to Lord Judd.

Annette Taberner of Education Otherwise Government Policy Group has also asked for a separate series of discussions around the alleged connection between forced marriage and home education to be submitted as part of the Education Otherwise consultation response.

We would also like to present for consideration the notes from our meeting with DCSF on August 29th which may be found here:

<http://www.freedomforchildrentogrow.org/CMereportIDDCSF29thAugust08meeting.pdf>

In our Overview we say that we believe the Department has three options, namely to leave the 2007 guidance untouched, to update the 2007 guidance with reference to subsequently enacted legislation and guidelines or to publish revised guidance along the lines proposed by Education Otherwise.

If the DCSF decides NOT to issue revised guidance on Children Missing Education they may still want to update the following :

Cover could be changed issuing department DCSF not DfES

1.2.7 Latest date for ContactPoint to be introduced is now Summer 2009 rather than "the end of 2008".

1.5.1 How will the new duty be monitored.

This talks about Joint Area Reviews which are now to be replaced by CAA.

2.2.5 Exclusions

Since this "6th day" duty has now been introduced, it would make more sense to refer to it in the present tense and to give link to guidance. It is also perhaps relevant to note that parents are now responsible for keeping their children out of public spaces for the first 5 days of exclusion.

3.2.7 It may be useful to highlight the changes in funding/commissioning Connexions Service introduced in April 2008.

3.2.9 Revised Attendance and Exclusions Sweep Guidance was published in September 2007, following the introduction of the "6th day" duty mentioned in 2.2.5. This reference could usefully be updated.

3.3.2 makes reference to Joint Area Reviews, shortly to be replaced by CAA. 3.3.2 could perhaps be updated with latest information about data collection from Pupil Referral Units ? 2008 White Paper on Alternative Provision could also be cited ?

3.3.11 Reference should be made to DCSF Elective Home Education Guidelines published in November 2007

3.4.3 Again the introduction date for ContactPoint could be changed.

3.7.2 Updated references could be made to the School Admissions Code. ( Current guidance refers to February 2007 in future tense)

3.7.3 In Year Fair Access Protocols reference could be updated. Current guidance refers to September 2007 in future tense.

3.7.3 URL could be updated from DfES to DCSF

3.8.2 update URL from DfES to DCSF

3.8.3 Ref to 2008 White Paper on Alternative Provision ?

3.8.4 URL could be updated from DfES to DCSF

3.9.4 Ref could be updated from DfES to DCSF

We suggest "awareness of DCSF Home Education Guidelines" could usefully be added to the checklist on p.31.

Education Otherwise has also responded via the online questionnaire on the DCSF consultation site.

Yours faithfully

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Member of Education Otherwise Disability Group  
Trustee Education Otherwise

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#### **POSTSCRIPT SENT TO CONSULTATION UNIT 24/10/08**

A question has come up in connection with Education Otherwise consultation response.

To our surprise, it seems that there is a possible misreading of the following sentence from the amended draft guidance supplied by EO:

"In order to discharge their duties in relation to children not receiving an education, local authorities should make inquiries with parents about whether their home educated children are receiving education. The Elective Home Education Guidelines for Local Authorities make clear that parents who home educate may take a number of equally valid approaches to educational provision for their children. "

What we had in mind was as follows:

Question: is your child receiving education?

Answer: yes

Question (rhetorical) so your child won't be needing a school place, then.

Answer: that's correct.

This is in respect both of the duty to provide school places and also of the duty to make arrangements to identify children not receiving education.