

19 August 2019

Dear sir/madam

Consultation - Education Authority draft guidelines on Elective Home Education.

Thank you for the opportunity to respond to the above consultation.

The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. To date 94% of controlled schools have opted-in to register with CSSC.

The controlled sector is:

- Large – it accounts for 49% of all schools and caters for over 143,600 children, making it the largest education sector in Northern Ireland.
- Diverse – providing education across all school types, i.e. nursery, primary, secondary, grammar and special schools. Within this, controlled integrated and controlled Irish Medium schools are included.
- Inclusive – providing education for children of all faiths and none (63% of pupils define as Protestant, 10% Catholic and 27% 'other') and over a third of newcomer pupils in Northern Ireland.

CSSC welcomes the opportunity to comment on the Education Authority's draft guidelines for elective home education. CSSC agrees with the key principles underpinning these guidelines which recognise a parent's right to secure their child's efficient full-time education outside of the formal school environment process in accordance with the legislative basis and the diversity of approaches to elective home education. CSSC notes the child centred and parent focused approach to the guidelines which acknowledges the diversity of possible approaches parents may wish to employ. As the support body for the controlled sector CSSC would like to comment specifically on the application of these guidelines for schools.

The guidance regarding the de-registration of a child is clear with respect to the role of parents and schools. CSSC is, however, concerned at the reference included in section 4.2 to the potential for discord in reaching a decision about home education where more than one person has parental responsibility. The inclusion of this possible scenario in section 4.2, which is in relation to the roles and responsibilities for schools, implies a mediation role for schools and CSSC believes that this is not an appropriate role for schools and would suggest that the EA's Elective Home Education Team is better placed to provide the advice and

support which could resolve parental discord in relation to the decision to home educate a child. CSSC therefore recommends that this reference is removed and that the responsibility for reaching an agreement on a decision is clearly stated as a responsibility for those with parental responsibility for the child and is stated as so in section 4.1 rather than what is currently drafted in section 4.2.

The guidelines, in stipulating the roles and responsibilities of parents in section 4.1, state that the EA encourages schools to offer parents information and support in transitioning to home education, and also encourages parents to contact their school to see what help they can offer. Home educating parents are not required to teach the Northern Ireland curriculum. The guidelines state that there are many valid approaches to educational provision; schools, on the other hand, are required to teach the Northern Ireland Curriculum and provide a broad and balanced education. Schools should therefore not be required to provide advice which is outside the framework of the Northern Ireland curriculum which is where their expertise lies. Advising parents to seek support from schools in this instance implies that schools are knowledgeable about the philosophy of home education and will be able to inform and influence a parent's decision regarding home education of their child. Home Education NI state that 'teaching in a classroom environment is very different from the kind of learning in small groups found in families.' The guidelines need to clarify for schools and indeed parents the extent of the support and help which can be provided by schools. The current implication is that schools have a role to play in building the capacity of parents to home educate their children. Indeed, as acknowledged by Home Education NI 'teaching in a classroom environment is very different from the kind of learning in small groups found in families.'

Further references are made in section 4.2 to the constructive support which should be offered to schools in supporting children to make the transition to home education and these include providing curriculum materials to help parents in the first few weeks of home education or the short term loan of text books. CSSC contends that schools, as professional, child centered organisations will facilitate the transition to Elective Home Education (EHE). The school will be well placed to provide a brief written report on the child's progress and attainment to assist parents in planning for EHE provision. CSSC is mindful that de-registration of a child will impact on a school's budget and potentially staffing, particularly if the de-registration concerns a child who is in receipt of a statement of Special Educational Needs and is receiving classroom assistant support. The advice for schools to provide parents with curriculum materials, to allow for the short-term loan of textbooks and to be open to future discussion of provision with parents particularly during the transition phase builds parent's expectations about the extent of practical school support following their decision to home educate their child. Further clarification is required for schools and parents about the likely duration of what is referred to as the 'transition phase' and more detail should be provided about what this support from schools will include so that parents have realistic expectations of schools and schools do not continue to have a responsibility which the process of de-registration clearly removes.

CSSC notes the processes that EA will follow when there is a concern about the suitability of a child's education. These steps relate to the period of time following deregistration. There is no reference to how schools may articulate a concern they may have about a parent's

decision on notification of the intention to deregister. The guidance for schools is clear that a school cannot legally prevent or delay de-registration of a child once formally notified by the parent, however, should a school have a valid concern about the suitability of this decision there is no reference to whom the school should direct this concern. The obligation on schools is to complete an attendance form and provide additional copies to the child's parent via email to the EHE Team at the Education Authority along with a scanned copy of the parent's de-registration letter, and the Education Welfare Service as per DE Circular 2018/12. While the email address for the EHE team is provided it is not in the context of expressing a concern. CSSC would like to see guidance provided to schools with respect to how they may best address a concern at the very beginning of the process to members of the EHE team. A named contact for schools at the EHE team would also facilitate communication of these concerns.

The guidance for parents in how the EA will, in accordance with statutory processes, explore and address a concern about the suitability of education being provided by a parent is clear. The guidelines are, however, silent on how, in the event of EA serving a School Attendance Order requiring the child to become a registered pupil at a school, the transition from elective home education to school based education will be supported by the EHE team. CSSC recommends that the guidance addresses this potentially challenging transition in its guidelines so that both parents and schools have a clear understanding of their roles and responsibilities in supporting the child's continuing education.

CSSC has considered these draft guidelines and believes that they provide a clear understanding of the legal and practical framework in relation to elective home education in Northern Ireland, particularly for parents. While CSSC is mindful that it is only a small percentage of parents who will choose to home educate their children it is essential that schools, if faced with this situation, are confident of their role in the process. The guidance must ensure that parents do not have unrealistic/unreasonable expectations of on-going support from school and provide clarity in respect of the advice and support provided by EA to parents who make the decision to home educate their child.

CSSC welcomes the opportunity to respond to this consultation and to be given the opportunity to influence the final content of the guidelines for elective home education. CSSC is happy to discuss this response.

Yours faithfully



Barry Mulholland
Chief Executive