

Present:

Lord Michael Watson, Labour education spokesperson.

Lord Clive Soley

Daniel Monk professor of Law, Birkbeck University of London

David Harvey, Hampshire, AEHEP.

Geraint Evans, Ofsted.

Ofsted

Hilary Alford, Scott Bagshaw Kent LA

CLLR Gillian Ford, Clive Harris LGA

Kevin Grant Bromley LA

Anna Shaw Hertfordshire LA

Viv Trundell Buckinghamshire LA

Victoria Franklin NASWE

Sara Griffiths NASWE/ Cornwall Council

Venetia Buchanan EHE Sheffield, AEHEP

Alison Renouf London safeguarding Board

Janice Alison Whitaker Baroness – House of Lords

Introduction

The meeting was called by Lord Soley to discuss the merits of the Private Members Bill which is supported by Government but no time due to Brexit. The second reading is likely to be end of November. The meeting was partly to reaffirm key issues and discuss law/guidance

Comments/Observations

- AEHEP suggested an early first step would be the need for mandatory collection of data by DfE, nobody collects this data. Numbers of pupils EHE is not known, this was felt to be unacceptable.
- The bill as a clarification that the local authority already is responsible, the existing guidance has led to confusion and has enabled a wide range of interpretation, there is a lack of clarity on this issue and hence the good thing about the bill is that you are clarifying a duty which already exists and of course there needs to be checks to any exercise of power. We already

have reviewing systems for an appeal process – independent exclusion tribunals for instance, we could expand their remit. (DM)

- GE: Does this information exist somewhere else? With healthcare professional? Ofsted does look at children being withdrawn, and can contact the local authority. Believes that logistically would be difficult for Ofsted to take on this role, as they are already doing a lot of work on unregistered schools, this could be an aspect of what they do. Unsure if they would support an appeal process at this moment. If we move it from who does the checking to what is checked, it would be easier to check if the child is safe than how good the education is – should the focus be on safeguarding as opposed to an education check?
- Concerns that EHE is driven by schools not always parents.
- Discussion around LA role in terms of checking/creating relationships – key issue being the Guidance not the law
- Concern that some vulnerable parents are 'spoon fed' what to say to LA's by EHE groups
- Increase in EHE due to exclusion? Concern from LGA that academies data not available
- Kent reported link between EHE and troubled (gangs, poverty, etc) groups
- LSCB - Every borough keeps a record of home schooling kids they know of, it is the unknown who we are worried about from a safeguarding issue. There are children who may never be known. From a safeguarding position, nothing is more important than the parent registering children being home schooled. They are concerned about home schooling and radicalisation – we would want to see greater power for local authorities or an independent organisation where a child can be seen without their parent. Child protection plan could be useful if applied to home schooling. If the local authority were not to do the inspections, then we would need a national organisation to carry them out which would be expensive and complicated.
- NASWE - Agrees with the requirement to register, so the question is what is the action to be taken if the parent does not register the children? Parents were saying they felt they had to remove their children out of fear of their children being permanently excluded from school. Kent is very well resourced, but different local authorities may not be as able to carry out these checks. Also, there is no single standardised view on what constitutes as 'satisfactory' education.

Action to attendees: one paragraph of rough numbers in the areas, or shortcoming of the evidence which can be sent to the education minister, including any information about cases where children have been abused or radicalised.

AEHEP (DH) agreed to organise future meetings as matters develop.

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10 April 2017

Dear Sir Alan

Re: Elective Home Education

The AEHEP are writing to set out our views on how the 2007 guidance could be updated and to provide some statistical data and qualitative case studies to illustrate our concerns.

The founding principle of the AEHEP is to better support pupils and families who EHE. We want to make it clear that we have no wish to prevent EHE. The key challenges we face are families who EHE but have no intention of educating their child, or those who feel forced to remove their child from school in order to avoid exclusion as a result of a child's behaviour. It is not always appreciated that EHE is neither formally or uniformly monitored by the Local Authority (LA).

The AEHEP has recently undertaken a survey of members representing over 90 LA's and the following results are notable by the degree of consensus:

- 100% of EHE professionals surveyed do not believe that the current statutory guidance is fit for purpose.
- 100% of EHE professionals believe the current statutory guidance is in need of urgent review.
- 90% of EHE professionals do not believe that the current statutory guidance assists them to fulfil the requirements of their role.
- 98% of EHE professionals do not believe that the current statutory guidance supports the process of identifying which parents are providing a suitable education.
- 100% of EHE professionals do not believe that the current statutory guidance clearly indicates what a suitable education would look like in practice.
- 98% of EHE professionals do not believe that the current statutory guidance clearly indicates what parents are required to do to deliver a suitable education.

- 98% of professionals do not believe that the current statutory guidance supports safeguarding responsibilities. It does not assist professionals to keep children safe.

The AEHEP believes that the statutory guidance as it stands is not fit for purpose. The Education Act 1996 Section 7 requires parents to ensure their children receive a full time education suitable to their child's age, aptitude and ability. The Guidance begins with a statement that 'education is a fundamental right for every child' and that para 1.3 makes clear that the purpose of the guidelines is to support LAs. Regrettably the current statutory guidance does not equip local authorities with the tools to ensure parents fulfil this duty nor does it provide clear indicators as to how parents should meet this obligation when educating at home.

Perhaps of greatest concern is the belief that the guidance does not enable effective safeguarding of children as one AEHEP member says:

"The statutory guidance as it stands leaves children at risk because it is wide open to abuse by those who have no intention whatever of providing education; those who seek to hide a child from the authorities; those who seek to provide indoctrination unhindered by any regulation or challenge; and so on. The guidance flies in the face of all other areas of child protection law – as well as of common sense."


In order to address these serious concerns the AEHEP are proposing a series of changes to the guidance and these can be seen in Appendix 1. We note that Guidance can be revised quickly where there is the will as evidenced by the changes made to flexi schooling a few years ago.

The AEHEP are growing increasingly concerned about their inability to adequately fulfil statutory safeguarding requirements whilst also ensuring parents meet their educational obligations. Whilst it is not possible to provide an accurate number of children educated otherwise (no central data is collected by DfE), what is known from the experiences of professionals is that thousands of children are now receiving provision in the home which is, in the main, unchecked and unverified. Appendix 2 illustrates, from a random selection of Local authorities (those on the executive committee of the AEHEP), the growing number of children who are EHE. There are now significant numbers of children for whom no information is known regarding their well-being, progress or safety. This cannot be in the public interest.

The rise in EHE numbers must also be set against a background where secondary schools in particular, are 'easing' pupils off roll who might otherwise negatively impact upon performance data. These are our most vulnerable pupils.

In the immediate future the AEHEP would be pleased to discuss this matter further and in the longer term we are intending to organise a national conference to highlight the issues raised in this letter. We would welcome your support.

Yours sincerely



David Harvey

Appendix 1

Amendments AEHEP Guidance March 17

	Current	Proposed
2.16	Section 53 of the Children Act 2004 ("the 2004 Act") sets out the duty on local authorities to, where reasonably practicable, take into account the child's wishes and feelings with regard to the provision of services. Section 53 does not extend local authorities' functions. It does not, for example, place an obligation on local authorities to ascertain the child's wishes about elective home education as it is not a service provided by the local authority.	Section 53 of the Children Act 2004 Act sets out the duty on local authorities to, where reasonably practicable, take into account the child's wishes and feelings with regard to the provision of services. Section 53 does not extend local authorities' functions. However, good practice and equitability between the rights of children educated at school and those educated otherwise would require local authorities to capture and record the voice of children educated at home.
2.3	The responsibility for a child's education rests with his or her parents. An "efficient" and "suitable" education is not defined in the Education Act 1996 but "efficient" has been broadly described in case law ¹ as an education that "achieves that which it sets out to achieve", and a "suitable" education is one that "primarily equips a child for life within the community of which he is a member, rather than the way of life in the country as a whole, as long as it does not foreclose the child's options in later years to adopt some other form of life if he wishes to do so".	The responsibility for a child's education rests with his or her parents. An "efficient" and "suitable" education is not defined in the Education Act 1996 but "efficient" has been broadly described in case law ¹ as an education that "achieves that which it sets out to achieve", and a "suitable" education is one that "primarily equips a child for life within the community of which he is a member, rather than the way of life in the country as a whole, as long as it does not foreclose the child's options in later years to adopt some other form of life if he wishes to do so". In line with this definition there will be an expectation that provision within the home include supervised instruction in reading, writing and numeracy which takes into account the child's age, ability, aptitude and any SEND. "We regard the fundamental academic skills of writing, reading and arithmetic as fundamental to any education for life in the modern world.....We should not in the ordinary case regard a system of education as suitable for any child capable of learning such skills, if it failed to instil in the child the ability to read, write or cope with arithmetical problems". (Harrison and Harrison v Stevenson)

2.6	<p>Local authorities have a statutory duty under section 436A of the Education Act 1996, inserted by the Education and Inspections Act 2006, to make arrangements to enable them to establish the identities, so far as it is possible to do so, of children in their area who are not receiving a suitable education. The duty applies in relation to children of compulsory school age who are not on a school roll, and who are not receiving a suitable education otherwise than being at school (for example, at home, privately, or in alternative provision). The guidance issued makes it clear that the duty does not apply to children who are being educated at home.²</p>	<p>Guidance on local authorities duties under section 436A of the Education Act 1996. The last sentence in para 2.6 states that 'The guidance issued makes it clear that the duty does not apply to children who are being educated at home'. The guidance referred to here, in footnote 2, was replaced in 2009 and the new guidance made clear that the section <i>did</i> apply to EHE. It stated that:</p> <p style="padding-left: 40px;">In order to comply with this duty local authorities need to make arrangements which will as far as possible enable them to determine whether any children who are not pupils at school, such as those being educated at home, are receiving suitable education. In order to do this local authorities should make enquiries with parents educating children at home about educational provision being made for them'</p> <p>The 2009 guidance was subsequently replaced in November 2013 and this current guidance, similarly makes clear that the duty <i>does</i> apply to EHE, by referring to it explicitly (page 5) and, generally, by advising that: 'The LA should consult the parents of the child when establishing whether the child is receiving suitable education' (p4).</p> <p>Could para 2.6 be amended to reflect the current position?</p>
2.7	<p>Local authorities have no statutory duties in relation to monitoring the quality of home education on a routine basis.</p> <p>However, under Section 437(1) of the Education Act 1996, local authorities shall intervene</p>	<p>Local authorities have no statutory duties in relation to monitoring the quality of home education on a uniform basis. Local authorities should though be able to ascertain that families are still living in their area and provision is continuing by receiving updates. Parents are expected to provide initial information regarding their provision at home at the point of deregistration or upon becoming known to the local authority in the case of children not previously on roll at school. This</p>

		<p>information should be updated at regular intervals.</p> <p>However, under Section 437(1) of the Education Act 1996, local authorities shall intervene</p>
2.8	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures. Parents are under no duty to respond to such enquiries, but it would be sensible for them to do so.</p>	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. All parents should respond to informal enquiries in order to assist local authorities to determine that education at home is suitable. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures.</p> <p>Philips v Brown case law would support this change</p>
3.4	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents should be given the opportunity to address any specific concerns that the authority has. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way. Parents are under no duty to respond to such requests for information or a meeting, but it would be sensible for them to do so.</p>	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents can expect to be given the opportunity to address any specific concerns and local authorities can expect parents to provide further information as requested. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way.</p>

3.6	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in the vast majority of cases, be able to discuss and evaluate the parents' educational provision by alternative means. If they choose not to meet, parents may be asked to provide evidence that they are providing a suitable education. If a local authority asks parents for information they are under no duty to comply although it would be sensible for them to do so.</p>	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in all cases, be able to discuss and evaluate the parents' educational provision by alternative means. Parents will be asked to provide evidence that they are providing a suitable education. Parents might prefer, for example, to write a report, provide samples of work, have their educational provision endorsed by a third party (such as an independent home tutor) or provide evidence in some other appropriate form.</p>
3.15	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>consistent involvement of parents</p>	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>Supervised reading, writing and numeracy at a level appropriate to their child's age, aptitude, ability and any SEND</p> <p>consistent involvement of parents</p>

Appendix 3

Case Studies from a variety of Local Authorities

Child A (Yr 10) began to self-harm and school attendance became an issue. Child and Adolescent Mental Health Service (CAMHS) were involved but Child A was still not able to attend school and when they did, behaviour was problematic. School informed mum that they would either prosecute for nonattendance or permanently exclude. School wrote a letter and mum signed it. Child A continues to self-harm and has also attempted suicide. The family have confirmed this child is not receiving an education.

Child B (Yr 11) was removed from roll to be educated at home without a deregistration letter following a conversation with parents. Attendance and behaviour have been poor throughout this child's school life. A representative from school informed me that 'this child was a nightmare' and they would not have Child B back in school. They continued by saying that 'they would find a way to get rid of him, it's easily done.' Since then Child B's whereabouts have been an issue. Police have been involved due to Child B going missing. The family have confirmed this child is not receiving an education.

Child C (Yr 11) is at risk of Child Sexual Exploitation (CSE). School attendance was sporadic. Home life was difficult with other family members either at risk of or involved in CSE. School advised parents that home education would be beneficial as Child C did not want to go to school. Police and social care involved.

Child D (Yr 11) was removed from school roll in September 2016. Parents had written a letter to the school which had been forwarded to the local authority. In January the parent contacted the LA to complain about lack of education provision, it emerged parent was illiterate and had no idea she had signed a letter to remove child from school to EHE.

Child E (Yr 8 C&YP) taken out of school by father as he had been prosecuted for son's nonattendance, father works 40 hours per week. Son is left to complete some English and maths work on applications on a tablet. When the EHE officer asked the young boy what he does when he doesn't understand what to do, he said he moves on to something else.

Child F/G/H/I Family consists of mother and 11 children, 8 are school age. Historic attendance concerns for all children in family and mother has been in enforcement process on several occasions. Two boys on EHE during 2015, mother did not engage with EHE Officer. S437 letter sent and boys returned to school. Attendance concerns continued By November 2016 the two boys (now Yr 11 and Yr 10 and both known to police for antisocial behaviour and drugs) again removed from school to

EHE along with Yr 8 boy. Mother did not engage with EHE Officer and process in place via In Year Fair Access Panel to return to school. Case currently referred to Social Care by Secondary school which Yr7 boy attends. Concerns include his presentation (hungry, dirty), presence of unknown male in house and lack of engagement by mother. Historic Social Care involvement over several years (neglect, domestic violence). Primary school reports that younger children are taken to school by older siblings, mother is never seen. Professionals are rarely allowed access to house. Any conversation is held on doorstep.

Child J (Yr11 C&YP) Academy school met father and suggested that his son was at risk of permanent exclusion. They suggested he consider electively home educating to avoid the exclusion going on his record. The father said the school asked him to sign a printed de-registration letter asking the school to take him off roll to electively home educate. The father was promised he could access GCSE examinations at the school but once he was de-registered this offer was redacted. Due to the level of vulnerability of this young man he was later taken into care by the Local Authority.

Child K (Yr 3,4 & 5 C&YP) taken out of school because school had referred to safeguarding due to concerns. Children are left to look after younger siblings, children have significant Special Educational Needs and Disability (SEND) and parents do not have the relevant skills to meet these needs but they refuse to engage with agencies to ensure their children are assessed for Education, Health and care Plans.

Child L : Y8 Boy. Child L was deregistered from his primary school by his father in early 2007. Parent refused to cooperate, arranged and cancelled meetings, court cases adjourned but by October 2008 still no one had seen the child. Home visits were made but the house was 'barricaded' to prevent any contact. Social services had no concerns so reluctantly the LA dropped pursuing the family as father had refused access and was not prepared to provide any evidence.

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10 April 2017

Dear Lord Soley

The AEHEP wrote to you on 24 January 2017 regarding concerns around Elective Home Education (EHE). We are writing again now, as promised, to set out our views on how the 2007 guidance could be updated and to provide some statistical data and qualitative case studies to illustrate our concerns.

The founding principle of the AEHEP is to better support pupils and families who EHE. We want to make it clear that we have no wish to prevent EHE. The key challenges we face are families who EHE but have no intention of educating their child, or those who feel forced to remove their child from school in order to avoid exclusion as a result of a child's behaviour. It is not always appreciated that EHE is neither formally or uniformly monitored by the Local Authority (LA).

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Yours sincerely



David Harvey

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2.8	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures. Parents are under no duty to respond to such enquiries, but it would be sensible for them to do so.</p>	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. All parents should respond to informal enquiries in order to assist local authorities to determine that education at home is suitable. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures.</p> <p>Philips v Brown case law would support this change</p>
3.4	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents should be given the opportunity to address any specific concerns that the authority has. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way. Parents are under no duty to respond to such requests for information or a meeting, but it would be sensible for them to do so.</p>	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents can expect to be given the opportunity to address any specific concerns and local authorities can expect parents to provide further information as requested. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way.</p>

3.6	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in the vast majority of cases, be able to discuss and evaluate the parents' educational provision by alternative means. If they choose not to meet, parents may be asked to provide evidence that they are providing a suitable education. If a local authority asks parents for information they are under no duty to comply although it would be sensible for them to do so.</p>	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in all cases, be able to discuss and evaluate the parents' educational provision by alternative means. Parents will be asked to provide evidence that they are providing a suitable education. Parents might prefer, for example, to write a report, provide samples of work, have their educational provision endorsed by a third party (such as an independent home tutor) or provide evidence in some other appropriate form.</p>
3.15	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>consistent involvement of parents</p>	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>Supervised reading, writing and numeracy at a level appropriate to their child's age, aptitude, ability and any SEND</p> <p>consistent involvement of parents</p>

Appendix 2

Number of EHE pupils by Selected Local Authorities*

Name of Local Authority:	Total number of EHE pupils			Percentage increase
	2013/2014	2014/2015	2015/2016	
Bromley	172	181	212	23%
Croydon	179	193	197	10%
Doncaster	216	237	267	24%
Hampshire	626	802	987	58%
Hertfordshire	598	668	798	33%
Lancashire	748	921	1146	53%
Sheffield	420	452	525	25%
Somerset	560	629	734	31%
Staffordshire	490	592	758	55%
Stockport	98	116	141	44%
Total	4107	4791	5765	40%

* these LA's represent the executive committee of the AEHEP. These figures represent those EHE pupils who are known to the LA, if a child has never attended school then parents are not obliged to tell the LA.

Thank you for letting me know your views on my Home Education (Duty of Local Authorities) Bill. I am sending a general reply at this stage but will add further comments in due course as some of you have asked specific question. I will not be able to answer all these questions until we reach the second reading stage probably at the end of the year.

This Bill is likely to be debated in the House of Lords towards the end of this year. I hope that in the intervening period I will be able to meet with those of you who wish to discuss it further. I will also be very willing to come to any meetings that might be arranged subject to time and place.

A few points of clarification at this stage. I am not opposed to home education indeed I have always seen it as an important right and one which deserves support. It does not get much support at present.

I am also aware that many parents take their child or children out of school for home education because they feel that the school is not giving their child the education that they think is necessary. This is strongly felt by parents who had a bad experience of the SEN Service in some schools.

I am also very conscious of the rights of parents but as some of you acknowledge this should be balanced with the rights of the child. If a child does not get the basic education necessary to cope in our modern and very complex society then we are failing that child. It is important to remember that some of these children are rejected by the school because they are 'difficult' and these children also deserve better support than they currently receive.

There is also the problem of the abuse of children. There has been a rapid rise in Home Education and this has co-incided with a greater public awareness of child abuse. We know that some children have been taken out of school and subsequently suffered abuse. An abusing parent is now more aware of being caught and taking the child out of school enables them to 'hide' the child.

In recent years this has been given additional urgency as there is some evidence that children have been removed from school to work illicitly at home or in a parent's business.

The Government is also concerned about the use of Home Education to put children into situations where they receive indoctrination supporting violent

extremism. You may wish to listen to this extract from the BBC Today news programme: <http://www.bbc.co.uk/programmes/b08xxdh3>. This was broadcast on the 20th July but it has been a growing concern for governments in recent years. The full item starts 2hrs and 40 minutes into the programme and the part concerning the wrong use of home education starts at 2hrs 40.

These are just some of the complications of this sensitive area of policy. It is my aim to create a better situation for parents who choose to home educate while also ensuring the rights of the child are recognised. I think we can do this much better than we are at present. Parents who Home educate deserve support so my Bill will try to get this balance right and that is why I will be willing to consider changes to the Bill if they appear necessary.

Yours,

Clive Soley

Lord Soley of Hammersmith



Summary Analysis of the ADCS Elective Home Education Survey October 2017

Executive summary

In October 2017, the Association of Directors of Children's Services (ADCS) issued a survey to all 152 local authorities (LAs) in England to understand better the volume and characteristics of the cohort of children and young people who are known to be home schooled and the support on offer to them and their families. Headline findings from this exercise, include:

- 118 responding LAs recorded a total of 35,487 children and young people known to be home schooled in their localities on school census day, Thursday 5 October 2017. It could be inferred that approximately 45,500 children and young people were being home schooled in England
- 92% of respondents reported year-on-year increases in the number of children and young people being home schooled
- Overall, slightly more males are known to be home schooled than females up to the end of key stage three, however, this trend reverses in key stages four and five where there are more females than males known to be home schooled. Overall, there is a significant jump in the number of children being home schooled between key stages one and two
- This cohort of children and young people is extremely fluid with the aggregated results of this survey suggesting between 35,819 and 49,154 were home schooled at some point in 2016/17, an in-year variation of 37%
- The majority of respondents reported over 80% of their known cohort had previously attended school, with general dissatisfaction with school being the most commonly cited reason for families choosing to home school
- 92% of respondents reported 0 – 10% of their known home schooling population had special educational needs and/or disabilities
- 37% of respondents reported they were aware of children in their area who were home schooled yet attending unregistered schools or tuition centres. Serious concerns about the quality of education on offer and the safety and welfare of attendees were reported
- Whilst the majority of home schooling families engage with their local authority and take up the offer of visits, respondents reported a small number of families refuse to meet or to share evidence of the education provided at home in different ways e.g. via samples of work or report from a tutor
- 65% of respondents reported having one or fewer full time equivalent staff to coordinate and monitor home schooling provision in their locality.

Commentary provided by LA staff highlighted concerns about the growth in numbers of children and families choosing to home school, many noted the absence of a registration requirement hinders the fulfilment of LA's statutory duties to identify children who are not receiving a suitable full-time education and to safeguard them. The growing complexity of this cohort's needs, links with unregistered schools and apparent breakdowns in the relationship between schools and families were also raised as issues multiple times. LA staff recognised that home schooling experiences can be suitable and nurturing, however, concerns arise when the education provided is not suited to the child's aptitude and ability or where the choice to educate at home is a further component of abuse and neglect. When the LA is denied the opportunity to see and speak to a child this is when the greatest concerns arise.

ADCS believes parents and carers who opt to electively home educate should register with the LA and LAs should be resourced to establish systems and safeguards to assure themselves that children and young people who are home schooled are receiving a good standard of education, delivered in a suitable learning environment, and that they are safe. These conclusions were first drawn in the Badman review of elective home education in England in June 2009, ADCS members firmly believe that many of Badman's recommendations remain pertinent to this day and should be adopted.



Summary Analysis of the ADCS Elective Home Education Survey October 2017

1. Background

In January 2016, the Association of Directors of Children's Services (ADCS) issued a survey to all 152 local authorities (LAs) in England on elective home education (EHE). The questions were designed to gauge the volume and characteristics of this cohort of children and young people, to understand how LAs across the country are supporting families who opt to home school and to understand how resources are being deployed in this area. A total of 73 valid responses were received and from the data provided, ADCS estimated somewhere in the region of 37,500 children were being home schooled nationally on Thursday 21 January 2016 (school census day).

This exercise was repeated in October 2017 and an updated version of the survey was issued to all LAs. A total of 118 valid responses were received from LAs across all nine regions. The results are summarised below.

2. Understanding the cohort

2.1. Total number of children known to be home schooled on Thursday 5 October 2017

Across the 118 LAs completing this survey, a total of 35,487 children and young people were known to be home schooled. Using this figure, it could be inferred that there were somewhere in the region of 45,712 children and young people being home schooled across the 152 LAs in England on 5 October 2017, an increase of approximately 7,500 on 21 January 2016. This growth may, in part, be due to rising birth rates, greater parental awareness of this option, improved LA recording techniques and better sharing of information between GPs and housing groups, for example.

The smallest reported cohort in any one LA was four children and the largest was 1,960 children, see appendix one for a breakdown of average cohort size by unitary, county, London borough and core city.

The majority of respondents strongly suspected the numbers of children being educated at home in their locality was much higher than reported but noted that without a mandatory registration scheme or a duty placed on parents and carers to comply with enquiries from their LA, there was no way of knowing with certainty the true size of this cohort:

"Just to note that the numbers of children known to be educated at home are probably equalled in number by those educated at home within the LA who remain, quite lawfully, un-registered with the LA."

"There is constant fluctuation during the academic year. Numbers generally peak around September and again in March/April and again in July. A lot of this appears to be related to transition points and parents not getting their first choice schools. There is also a large group of long term home educators."

"The number of registered electively home educated children within [LA] is at the highest level ever recorded."

2.2. Year-on-year increases in the home schooling cohort

117 LAs answered this question, 108 (92% of respondents) reported an increase and nine LAs said numbers had largely remained static or had fallen slightly in recent years. The majority of authorities reported steady year-on-year increases and a small number shared concerns about the rapid expansion of this cohort locally:

"EHE numbers continue to increase. On 5 October 2017, 39 new EHE notifications have been received since 1 September 2017 [LA with EHE population of 758]."



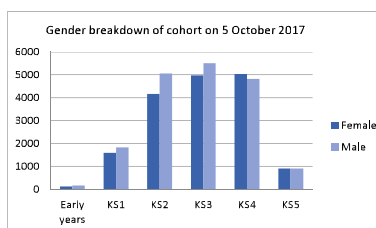
"Between July 2016 and July 2017, a significant increase of 56% [LA with EHE population of 1540]."

"At the end of the academic year 2016-17, 2.4% of the [LA with EHE population of 325] school population aged 5-16 were EHE. This compares to 2.1% in 2015-16 and 1.6% in 2014-15."

2.3. Breakdown of home schooled children by key stage and gender on school census day

114 LAs were able to supply this information in the format requested. As in 2016, a significant increase in the numbers of children being home schooled between key stages one and two for both males and females was evidenced, numbers remain steady thereafter.

Overall, 52% of the cohort are male and 48% female, this is in line with the findings of the 2016 survey. However, there are slightly more females in key stages four and five than males.



The 2017 survey requested information about early years and key stage five aged children and young people for the first time given the national policy focus on the early years and the raising of the participation age to 18 years, please note only 41* of the 114** respondents were able to provide these figures:

"We only record data for children once they have reached their fifth birthday, and up to the third week of June in the year they turn 16 years of age in accordance with current legislation."

	Early years* (Ages 0-5)	KS1** (Ages 5 – 7)	KS2** (Ages 7 – 11)	KS3** (Ages 11 – 14)	KS4** (Ages 14 – 16)	KS5* (Ages 16 – 18)	Total
Female	119	1595	4169	4980	5045	912	16820
Male	168	1823	5057	5504	4822	906	18280
Total	287	3418	9226	10484	9867	1818	35100

Please note the figures in this table are based on 114 responses so do not add up to 35,487.

2.4. The highest/lowest number of home schooled children and young people in 2016/17

112 LAs answered this question which was designed to capture the fluid nature of the home schooling cohort. A number of LAs reported that their cohort was at its smallest in the autumn term and largest in the summer term. In additional commentary, however, a smaller number of LAs reported their population is at its highest in the autumn term linked to an inability to access preferred school places, particularly in special schools. In 2016/17 the cohort ranged from 26,393 at its lowest point up to 36,219, aggregating these numbers up across the 152 LAs it could be inferred that the in-year cohort ranged from 35,819 to 49,154 children and young people, a considerable variation of 37%. This may potentially indicate home schooling is increasingly being used as a short-term intervention rather than a philosophical or lifestyle choice:



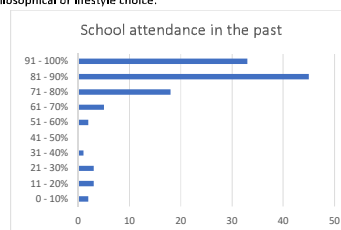
- A unitary in the North West had a home schooling population of 139 on 5 October 2017. Across the 2016/17 academic year the same LA had between 85 and 142 children on record, an in-year variation of 67%.
- A London borough had a home schooling population of 187 on 5 October 2017. Across the 2016/17 academic year the same LA had between 151 and 245 children and young people on record, an in-year variation of 62%.
- A county in the Eastern region had a home schooling population of 1019 on 5 October 2017. Across the 2016/17 academic year the same LA had between 708 and 1112 children on record, an in-year variation of 57% across the year.
- A unitary LA in the West Midlands had a known home schooling population of 1145 on 5 October 2017. Across the 2016/17 academic year the same LA had between 884 and 1215 children on record, an in-year variation of 43%.
- A county council in the South West had a home schooling population of 750 on 5 October 2017. Across the 2016/17 academic year the same LA had between 640 and 917 children on record, an in-year variation of 43%.

2.5. Previous school attendance

112 LAs responded to this question, 33 LAs reported 91 – 100% of their local EHE cohort had previously attended school whilst 45 LAs reported 81 – 90% had previously attended school. This too might suggest that home schooling is no longer purely a philosophical or lifestyle choice:

"We only have 3 children on our register who have never been to school [LA with EHE population of 322 on school census day]."

"The figure is 84%, this is compared to 69% in October 2013 [LA with EHE population of 709]. The concern is that the decision to EHE is made because of school related disputes on a wide range of issues from attendance, behaviour, perception of needs not being met, perceived pressure on children, admissions etc reflecting a growing parental dissatisfaction of formal education settings."



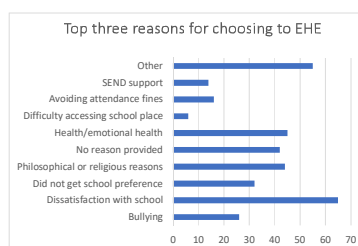
"60 of the current 451 have not previously attended schools. Some of this number includes Gypsy Roma Traveller families, under 5s and children from out of authority where the previous school may not have been noted on the notification."

2.6. Most common reasons given for choosing to home school

Here LAs were asked to select the top three reasons for choosing to home school provided by parents or carers locally. 'General dissatisfaction with the school' was cited 65 times, 'other' 55 times and health/emotional health 45 times. Within 'other,' anxiety/ stress/ school phobia was referenced several times as was behaviour management. Often parents feel they can better meet their child's needs themselves or simply do not supply a reason for choosing to home school.

A handful of LAs do not record reasons for home schooling, but most did. Additional commentary illustrates the complexity of this issue:

"Parents of Year 9, 10 and 11 students who EHE at this late stage for the first time increasingly report an 'unresolved difficulty' with an academy as the key reason or motive. It can include the threat of attendance penalty notices or behavioural issues linked to the potential for further exclusions. Increasingly, some parents allege that EHE is 'suggested' to them as an 'option' to avoid attendance fines or further exclusions. These parents invariably say they do not know what EHE entails."



"There is a real mix of reasons. The vast majority do not supply a reason. We have a large proportion of GRT [Gypsy Roma Traveller] pupils, a number of teenagers being open under CAMHS who are not coping with a mainstream school environment. We also do have a small proportion who withdraw to avoid prosecution for non-school attendance. Our long-term home educators tend to do it for philosophical/religious reasons."

"The current statutory guidance doesn't enable the LA to easily access these families to ensure the children's needs are being met. The traditional cohort has now been replaced as the philosophical home educators are now outnumbered by those families that feel they have no choice but to educate at home."

2.7. Special educational needs or disabilities

117 LAs provided a response to this question, of this number 109 said 0 – 10% of their home schooling cohort had special educational needs or disabilities, seven said 11 – 20% and one said 21 – 30%:

"Health/emotional health and worries around SEN has been a significant factor cited by parents for EHE in 2016/17."

"The current trends for EHE include SEND where parents have been refused an EHCP (this cohort often return to school)."

"A significant number of children de-registered from school have additional needs (social, medical, SEN). Many parents report to feeling they felt they had no other option. Some parents report that EHE has been suggested to them by school staff. Children with ASC [Autism Spectrum Condition], ADHD [Attention Deficit Hyperactivity Disorder] and/or anxiety make up a significant proportion of those children de-registered from school to be home educated."

2.8. Children missing education

The latest update to the Department for Education's (DfE's) children missing education (CME) guidance, which came into force in September 2016, placed a clear duty on all schools, including independent schools, to collect, record and share more detailed information with the LA about onward destinations when a child is removed from a school's roll at a non-standard transition point.

Views were mixed amongst the 111 respondents who provided an answer to this question, 50 LAs felt changes to the CME guidance had made a difference whilst 61 did not. Some noted there was no firm



evidence one way or another whilst others stated they already had strong processes and relationships in place with all local schools and/or tools to assist with notifications e.g. an online portal. Amongst those who felt the guidance had made a difference, six respondents specifically referenced clearer expectations of independent schools as a positive development:

"Since 2015-16 [LA] has had a robust system by which schools have reported a parental decision to electively home educate to the local authority."

"Schools having to submit starters and leavers information has definitely made a difference."

"We didn't think the changes in CME guidance 2016 resulted in greater awareness of pupils becoming EHE as our CME policy has always been robust. However, there has been one case where the child left one independent school and parents were EHE until they found another school – we wouldn't have been aware of this child without the new guidance."

2.9. Structures, systems and links to exclusions

111 LAs responded to this question, 50 of whom felt ongoing changes to school structures and wide ranging curriculum reforms were impacting on the rising numbers of children and young people withdrawing or being excluded from the mainstream schooling system, others were less sure:

"EHE numbers are increasing which in part may be due to increased pressures on schools and pupils to achieve academically and to improve attendance and behaviour. For some families and young people, the pressure becomes too great and EHE seems like a viable alternative. Budget cuts to schools and local authorities have led to there being fewer resources to support complex young people particularly those with SEMH [social, emotional and mental health needs] and this in part is a contributing factor."

"The rise in EHE referrals has coincided with the increase in academy conversions. This may be coincidental and the reasons for opting for EHE are relatively anecdotal and may be seen differently by schools/academies. However there remains a concern that "suggesting", "proposing" or "promoting" EHE may increasingly be used as a strategy to move children from roll."

"Although hard to verify, perceived reduction in school resources has led to an increase in potential exclusions which schools and parents would often prefer to convert to an EHE arrangement. In 2015/16 - 4% of EHE had been PEx [permanently excluded] - in 2016/17 this figure was 11%."

3. Supporting home schooling children and their families

3.1. Visit at home or at a neutral venue

113 local authorities answered this question. 97 authorities (or 86%) reported they offer a home visit while 16 (14%) do not. Some LAs reported they only make a visit when requested to do so by families or when concerns arise, whilst one LA offers a single visit per key stage. A number of LAs reported they are prioritising visits to children and families who are known to wider services, including children's social care or the SEND team, for example.

94 respondents provided figures showing an average of 76% take up rate of visits. Some LAs reported that a higher number of families agreed to a visit but cancelled or were not at home when the officer arrived:

"We have great confidence in our systems of monitoring and tracking EHE in the borough but are aware that where parents refuse a visit we are unable to pursue unless we have significant safeguarding concerns. Our neighbouring borough does not pursue visits at all unless parents actually request one therefore there is great discrepancy in approaches across the country."



"The policy of offering annual visits to all families has been amended to provide more on-going support. This change was necessary due to the increasing complexity of the students."

"When the LA first becomes aware that parents have chosen EHE, initial contact is made in order to establish a plan for provision is being made. This is done via inviting parents/carers to complete and return an initial EHE form. Once a year EHE parents/carers are sent an EHE Self Evaluation Form to complete and return with information about the child's learning. The form asks parents to describe the form and content of the educational programme, and to include samples of the child's work. In addition to this, some parents prefer an EHE visit meeting. Both forms invite the parent /carer to say if they wish to meet with the EHE link Advisor and Senior Education Welfare Officer. Where this preference is stated, a meeting will be arranged with the parents/carers. The LA may also initiate a request to meet with the parent /carer in cases where the information provided by the parent/carers gives cause for concern about the suitability of the provision, or where it appears that there are gaps in the provision that may indicate that the child's learning and social opportunities are restrictive or limited."

3.2. Take up of home visits and presence of children and young people

81 LAs were able to provide this additional information suggesting children and young people were present at an average of 85% of visits but there was significant variance amongst the responses.

3.3. Alternative evidence of education

62 LAs responded to this question, 21 provided commentary whilst 41 provided a numerical answer. Based on the 41 numerical responses received, an average of 48% of families opted to provide evidence of education in lieu of a home visit e.g. samples of work or a report by an independent tutor.

3.4. Use of school attendance orders (SAOs)

Of the 112 LAs that answered this question, 66 (or 58% of respondents) reported not issuing any notices in the last full academic year. 46 LAs (or 41% of respondents) reported they had issued a total of 258 school attendance orders (SAOs) relating to home schooling, ranging from one to 47 SAOs per LA in the last academic year. 34 LAs reported a total of 85 children returned to school as a result of formal SAO action via the courts.

As in 2016, a number of authorities reported that once they had initiated the SAO process either families began engaging with the LA or the child(ren) returned to school, several others said they were supporting home schooling families via early help services to head off the need for formal action:

"20 School Attendance Order cases were initiated. 5 children returned to a school based education and evidence of a 'suitable education' was produced in most of the other cases."

"The sanctions available to Magistrates where a parent fails to comply with a School Attendance Order (SAO) need reviewing. At the moment a parent can only be given a fine of up to a £1,000 or a conditional discharge. There are occasions where following prosecution, a parent still fails to comply with the SAO and an LA is left with no alternative but to go back to court. Both Magistrates and LA Officers are frustrated, that just continually fining a family may not produce compliance. Sanctions equal to those given to Magistrates under Sec 444 1a of the Education Act 1996 need to be put in place where there is failure to comply with an SAO. Currently a parent who 'knowingly fails to secure the regular attendance at school of their child', can receive a more severe sanction than the parent of child where there is no/unsatisfactory evidence there is any education at all, but they still fail to comply with the SAO."

"As the only means of challenging parents not providing a suitable education, school attendance orders are not as effective as required. Timescales are not proportionate so children not being educated at home can be without education for many months. The system doesn't seem to be as useful for children educated at home and a more streamlined method of returning children to school would be beneficial. The LA should be



able to remove the designation of 'educated otherwise' without the need to go to court once provision has been deemed unsuitable. A key concern is the increasing number of vulnerable children now being educated at home. I have increasing numbers of children and parents with mental health issues, anxiety, depression, children known to social care and youth offending."

3.5. Exam support

Of the 113 LAs responding to this question, 53 (47% of respondents) provide support to home schooling children in sitting formal exams. Types of support on offer include signposting or leaflets about exam boards/exam centres and revision techniques, the provision of telephone advice and networking meetings.

One LA stated it contributes up to £200 whilst two contribute £287 for each child sitting formal exams and two LAs pay for two GCSEs as long as one is English or Maths.

"We provide names of exam centres in the local area that can be used by EHE children - the information is given in our "Information to Parents" booklet together with details of exam boards and costs. We have also helped children to sit their exams through our alternative provision when parents have been unable to afford the fees."

"We commission a unique parent led support program. This has been commended as good practice by Ofsted."

"One of our Pupil Referral Units acts as the registered exam centre so that EHE students can be entered as external candidates. The exams officer and LA officer provide administrative support. The parents pay for the exam entries."

3.6. Formal exam entries

Of the 96 responses to this question, 36 LAs stated the number of local children who are home schooled and sat formal exams, including GCSEs and A Levels, was currently unknown while 13 LAs said they do not collect this information (neither parents nor the schools and colleges where the child sits their exams are required to notify the LA). 12 LAs reported zero home schooled children and young people sat exams in 2016/17 while the remaining 35 LAs reported a total of 384 young people had sat exams with a range of 1 – 62 candidates per LA.

3.7. Support for controlled assessments

Of the 108 LAs answering this question, 40 (37% of respondents) reported local schools and colleges provided some form of support to home schooling learners to sit exams whilst 68 (or 63%) did not:

"One of the local academies offers support but it is not co-ordinated by the LA."

"We signpost EHE pupils to local colleges who provide access to examinations and accreditation."

"FE colleges do not provide support for EHE in controlled assessments but they do provide FE vocational training courses to EHE registered children."

4. Safeguarding

4.1. Information sharing policies for out of area moves

Of the 113 LAs responding to this question, 102 (90% of respondents) reported they had a policy to enable the sharing of information while nine (or 10%) LAs did not, this mirrors the findings of the 2016 survey.

4.2. Use of Section 17 Assessments, Section 47 Enquiries and Child Protection Plans



99 responses were received to this question, 25 LAs reported zero Section 17 Assessments (S17s) had been completed, 74 LAs reported a cumulative total of 1282 S17s had been completed. Figures ranged from 1 – 156, in 2016 the range reported by 66 respondents was 0 – 84 assessments per LA.

96 responses were received about the numbers of Section 47 Enquiries (S47s). 23 LAs reported zero enquiries had been undertaken, a total of 425 S47 enquiries were carried out by the remaining 73 LAs. Figures ranged from 1 – 41, in 2016 the range reported by 65 respondents was 0 – 22 enquiries per LA.

103 responses were received about the numbers of children and young people who are home schooled and the subject of a child protection plan (CPP). 18 LAs reported zero CPPs, the remaining 85 reported a total of 368 CPPs. Figures ranged from 1 – 19, in 2016 the range reported by 68 respondents was 0 – 8 plans per LA:

“Currently 58% of children on our EHE list are known [London Borough with EHE population of 246].”

“80.5% of children included in the EHE school population in the 2016/17 had either been known to social care or are actively involved with the children’s social care [London borough with EHE population of 272].”

“We revised our EHE policy so that children subject to child protection plans cannot be EHE and if they are a child in need, EHE status is reviewed to ensure that this status would not cause the child further impairment or damage to their wellbeing or development.”

4.3. Use of unregistered schools and/or tuition centres

Of the 115 LAs that answered this question, 40 (or 34% of respondents) were aware of unregistered schools/tuition centres operating in their area. In localities with a high concentration of unregistered schools, LAs report they are in regular contact with Ofsted and the DiE about their concerns:

“I am very concerned about the use of unregistered schools by EHE families where children appear in many cases to be receiving the majority of their education. I am concerned at how owners of these establishments are advertising and recruiting and how they are projecting this approach as a method of ‘home’ education.”

“A small number of EHE parents use tuition centres, private tutors or online providers. Requests for information about the form and content of the educational provision is in the first instance made to the parent(s) to provide this from the provider. In all the cases where parents use external providers, parents gave consent for the LA to approach the provider directly for this information.”

“I am definitely concerned that even when the qualifications and DBS checks may be accurate and up to date there are concerns over a broad and balanced curriculum. Many centres do not offer art, music, PE or even have an outdoor area for children to play in. They know the law and are adept at briefing parents in what to say to LAs, for example ‘parents are offering the remaining curriculum at home.’ Many centres project themselves as ‘schools’ so parents are not always aware that they are not registered and therefore not under the same rigorous protocols as registered schools. Parents are under the impression that their children are attending ‘school’ and see this as an advantage because they are paying. In addition, there are smaller class sizes and they are led to believe that the discipline is better and more effective than mainstream school. Also, more worrying is that this projection is given to other services, for example, social care and they then believe it is a private school. Lots of tuition centres offer specific coaching towards qualifications - sometimes to the exclusivity of any other type of curriculum - and although this is particularly at KS3 and KS4 I am seeing an increased number of children in early years and KS1.”



5. Resources

5.1. Annual budget (and actual spend) on the coordination of home schooling

80 responses were received to this question and annual budgets varied significantly. 10 LAs reported they had no dedicated budget or that these services operated in a wider context. The budgets in the remaining 72 LAs ranged from £4,000 up to £197,000. The majority of LAs noted their budget covered staffing only.

88 responded to the actual budget question, 13 LAs reported an overspend (four of whom had a £0 budget for home schooling yet actual spend ranged from £10,000 - £44,496), just five reported an underspend.

5.2. Number of relevant full time equivalent (FTE) staff

111 responses were received to this question. 45 LAs (40% of respondents) reported they had less than one full time equivalent (FTE) member of staff to co-ordinate and monitor home schooling provision; 28 LAs (25%) had an FTE member of staff; 33 (30%) had between two and three FTE members of staff; and, five (5%) had more than three FTE members of staff. Based on 110 responses received, the average number of FTEs per LA on 5 October 2017 was 1.1.*

"0.4 FTE plus an EHE consultant who accompanies the officer on visits to assess the quality of the education that is being provided."

"One full time EHE Coordinator, one 0.6 fte Consultant undertaking assessments of provision."

"0.7 Advisory Teacher. 0.2 Admin Support."

* One LA reported oversight sits with a wider team of 120 staff, this response has been excluded here.

5.3. Location of team

115 responses were received and the picture was varied. EHE oversight commonly sat with the Access and Inclusion, Admissions, Education Welfare or Pupil Services. However, several LAs reported this sat within safeguarding.

6. Specific comments about existing guidance and legislation

"A review of the EHE guidance is needed to clarify the role and responsibilities of the Local Authority and parents. The current guidance is at odds with CME and the new SEND code of practice which further adds to the confusion."

"The LA, with the support of local councillors, is very concerned by the continuing increase in parents choosing to home educate when this may reduce educational outcomes and aspirations for the young people. We would like to see the current legal framework updated to ensure children are seen regularly (at least twice a year) and provide a clear framework for suitable education to be gauged. We would request consideration of a period of time for the child's place on the school roll to be kept open to ensure parents have the opportunity to consider this action and reduce time out of education if this has been a decision made in haste or without full understanding."

"In the interests of safeguarding, we feel that there should be a requirement for all EHE students to be registered with the LA and that students must be seen by an LA Officer as part of the monitoring process. There should be a mechanism for the LA to record the number of EHE students at Census and appropriate funding made available to LAs to ensure effective monitoring arrangements are in place."

"The lack of a definition of suitable provision is problematic. Whilst there should be scope for parents to develop a personalised package, this does not mean that criteria cannot be put in place. A suitable



provision at home should include formal maths, English, ICT and social activities outside of the house. Parents should also be required to assess the progress of their children and demonstrate that learning is taking place. 'Full time' should be given a set number of hours. Effective systems of challenge need to be developed to deal with those schools that actively off-roll pupils into home education. Some schools have template letters for parents to sign. Parents often leave school without knowing the responsibility they are taking on. More should be done to capture and measure the outcomes of these students. Anecdotal evidence suggests that home educated children are over represented in NEET figures."

"As a local authority we feel that it would be helpful for the DfE to provide a definition of a 'suitable education.' Within this definition we would like to see an outline of the number of hours of education a week, evidence of a broad, balanced planned programme of education that is appropriate to the age, ability and needs of the individual child to ensure that the child's physical, emotional, cultural and intellectual needs are met. Statutory guidance around annual reviews would be helpful."

"EHE greatly concerns us, we have seen growing numbers of parents choosing to EHE their children, and often this has been through coercion from schools, often these are vulnerable families who are not capable of EHE. The DfE guidance is very open to interpretation. There is no definition of a "suitable education", which would be helpful, we think this definition should include what should be taught and the number of minimum hours, expected levels of achievement at each key stage would also be helpful. We could not comprehensively say how many actual children are EHE in the area, given that there is no requirement to keep a register or for parents to contact their local authority."

"...We think that greater provisions should be made to enable EHE children to sit formal exams if they wish at GCSE, otherwise progression into Post 16 education can be difficult if they have no formal recognised qualifications."

"Present statutory guidance is such that should any child stop attending an FE-based EHE provision there is no requirement for that FE setting to notify the LA. The FE College can just remove them from the course; so children missing education is a real possibility."

7. Additional comments

"The Badman review in 2009 examined EHE. The number of children becoming EHE has risen significantly since this review, but the issues remain the same and there are less resources available to the LA. Despite several SCR [serious case review] recommendations and the potential/reality of children not being known - the current legislation enables parents to remain under the radar and/or just provide a philosophy which may have been printed from the internet. That said there are many EHE families who are providing a thorough education which is bespoke and appropriate to their children."

"As an authority we are concerned that parents choose to home educate as an avoidance option and at the moment there is no legal right for LA officers to see, monitor or supervise the education the child is receiving. We can only intervene if there are serious safeguarding concerns or we can prove the child is not receiving a suitable education; this can be very difficult to prove."

"We are noticing a trend of EHE parents requesting a new school place less than 6 months after deciding to EHE e.g. at the October 17 Fair Access Meetings 16 applications for a return to school were presented."

"In [county LA] 0.8% of the school age population are EHE. In 2012 the percentage was 0.3%. The LA has concerns around safeguarding and would support significant change to both the law and DfE guidance."

"I would suggest that schools would prefer a child to become EHE rather than be excluded. As schools are often judged on their attendance and performance results, then I would suggest that for many Yr10/11 children who become EHE, attendance and performance aspects are impacting more significantly than exclusion rates. Medical issues are having a greater impact than previously, with children leaving school



due to anxiety issues. Reduced capacity in terms of Education Welfare Support may also lead to parents making less informed decisions."

"In the past 2 years we have had 2 tuition centres operating as unregistered 'schools' and purporting to be offering tuition to EHE children. This was reported to the DfE and Ofsted and both are now closed. There were serious concerns about safer recruitment, the curriculum that was being taught and the children being exposed to extremist attitudes and materials with the risk of radicalisation and the arrangements for the safeguarding of the children."

"There has been a relative decrease in EHE numbers in [LA] since we have introduced two key policies:
1. A requirement to provide us with written evidence of a Planned Programme of Education. The legal basis for requesting this has been challenged by parents, but they eventually agreed to provide it.
2. A clause in our local Fair Access Protocol which determines that children withdrawn to be home educated who subsequently make an application for another school are required to return to their previous school, in order to discuss / resolve any underlying issues. Schools can arrange a 'managed move', involving a 6-week trial, if a change of school place is considered appropriate."

Appendix one – home schooling cohort breakdown within each type of LA

Based on requests received in 2016 for a greater level of detail to be provided for benchmarking purposes, a random sample of five LAs has been selected by type e.g. core cities, London boroughs.

Random sample of five core cities	Cumulative total	Average	Random sample of five county councils	Cumulative total	Average
Known home schooling population	2433	486	Known home schooling population	5303	1060
Highest / lowest numbers in 2016/17 academic year	1768 to 2551	44% variance	Highest / lowest numbers in 2016/17 academic year	3993 to 5664	41% variance
Has the local home schooling population increased?	100% reported increases	Yes	Has the local home schooling population increased?	100% reported increases	Yes
Male/Female breakdown	50/50	50/50	Male/Female breakdown	52/48	52/48
SEND needs	0 - 10%	0 - 10%	SEND needs	1 - 10%	1 - 10%
Attended school before?	81 - 90%	81 - 90%	Attended school before?	81 - 90%	81 - 90%
Section 17s	26	5.2	Section 17s	125	25
Section 47s	4	1	Section 47s	29	5.8
Child Protect Plans	7	1.4	Child Protect Plans	26	5.2
School Attend Orders	46	9.2	School Attend Orders	13	2.6

Random sample of five London boroughs	Cumulative total	Average	Random sample of five unitary councils	Cumulative total	Average
Known home schooling population	1103	220	Known home schooling population	909	181
Highest / lowest numbers in 2016/17 academic year	904 to 1187	31% variance	Highest / lowest numbers in 2016/17 academic year	747 to 987	32% variance
Has the local home schooling population increased?	100% reported increases	Yes	Has the local home schooling population increased?	80%	Majority yes
Male/Female breakdown	52/48	52/48	Male/Female breakdown	52/48	52/48
SEND needs	1 - 10%	1 - 10%	SEND needs	1 - 10%	1 - 10%
Attended school before?	51 - 60%	51 - 60%	Attended school before?	81 - 90%	81 - 90%
Section 17s	25	5	Section 17s	33	6.6
Section 47s	20	4	Section 47s	13	2.5
Child Protect Plans	17	3.4	Child Protect Plans	9	1.8
School Attend Orders	1	0.2	School Attend Orders	10	2

Survey on Elective Home Education - Introduction

Numbers of children who are electively home educated (EHE) are not routinely captured via a national data return.

In 2016 ADCS issued a short survey to all local authorities in England in a bid to understand more about this cohort of children, the support on offer to EHE families across the country and how these services are arranged locally.

We understand that local authorities can only report on the numbers of EHE learners that are known to them and that it is difficult to gain a comprehensive picture of the size and make up of this cohort without a mandatory registration process, however, we are interested in furthering our understanding in this area. The DfE is similarly interested in the results of exercise.

Please complete this survey using school census day (Thursday 5 October 2017) data.

The results of this survey will be shared with the ADCS membership in the coming weeks, please complete and return this survey by Friday 27 October 2017. If you have any questions or queries please contact [REDACTED]

Thank you for your assistance.

Data

1. On 5 October 2017, how many children in total were you aware of being electively home educated in your LA?

2. Has this number increased year on year?

☐ Yes

☐ No

Comment:

3. How many children are electively home educated by key stage and gender as captured on 5 October 2017?

Male

Early Years

Key Stage 1

Key Stage 2

Key Stage 3

Key Stage 4

Key Stage 5

Female

Early Years

Key Stage 1

Key Stage 2

Key Stage 3

Key Stage 4

Key Stage 5

4. What proportion of your local EHE population has previously attended a school?

- ☐ 0-10%
- ☐ 11-20%
- ☐ 21-30%
- ☐ 31-40%
- ☐ 41-50%
- ☐ 51-60%
- ☐ 61-70%
- ☐ 71-80%
- ☐ 81-90%
- ☐ 91-100%

Comment:

5. What are the top 3 reasons given by parents/carers for choosing EHE, as captured on 5 October 2017

- ☐ Dissatisfaction with the school - SEND
- ☐ Dissatisfaction with the school - Bullying
- ☐ General dissatisfaction with the school
- ☐ Did not get school preference
- ☐ Philosophical/religious reasons
- ☐ Parents did not provide a reason
- ☐ Health/emotional health
- ☐ Difficulty in accessing a school place
- ☐ A means of avoiding school attendance fines
- ☐ Other (please specify)

6. What percentage of the total number of EHE children have a statement of SEND/EHCP as captured on 5 October 2017

- ☐ 0
- ☐ 1-10%
- ☐ 11-20%
- ☐ 21-30%
- ☐ 31-40%
- ☐ 41-50%
- ☐ 51-60%
- ☐ 61-70%
- ☐ 71-80%
- ☐ 81-90%
- ☐ 91-100%

7. Have changes in the Children Missing in Education guidance from 2016 resulted in greater awareness of pupils becoming EHE?

- ☐ Yes
- ☐ No

Comment

8. In the last full academic year, 2016/17, what was the lowest number of EHE children at any point in the year?

9. In the last full academic year, 2016/17, what was the highest number of EHE children at any point in the year?

10. Have exclusion rates and changes to school structures and systems impacted on EHE numbers locally?

☐ Yes

☐ No

Comment:

Education Visits

11. Does your LA contact parents to request an annual home visit or a meeting at a neutral venue in order to discuss the education arrangements for their child/children?

- ☐ Yes
☐ No

12. If 'yes',

What percentage of EHE families agree to a home visit by the LA? Please omit the % sign from your answer,

What percentage of children are present at the meeting with their parents? Please omit the % sign from your answer,

13. If 'no', what percentage of families who refuse direct access, provide evidence in alternative ways? (E.G. a report, samples of work, independent home tutor report, or other appropriate form)

14. How many school attendance notices issued by the local authority related to EHE in 2016/17?

15. How many of these notices relating to EHE resulted in the child returning to a school based education?

EHE Support

16. Does you LA offer any support for EHE children to undertake exams?

- ☐ Yes
☐ No

17. If 'Yes', what support do you offer?

18. How many EHE children in your local area are known to have sat formal exams in 2016/17?

19. Do any schools or FE colleges in your local area provide support for EHE children in controlled assessments?

- ☐ Yes
☐ No

20. Where EHE families move out of area, do you have a policy to enable any relevant information to be shared with the new LA?

- ☐ Yes
☐ No

Welfare Support and Safeguarding

21. How many Section 17 assessments were completed for children who were EHE during 2016/17

22. How many Section 47 Assessments were conducted for children who were EHE during 2016/17?

23. How many EHE children were subject to a child protection plan or entered care during 2016/17?

Tuition Centres and Unregistered Schools

24. Are you aware of EHE children in your area attending unregistered schools and/or tuition centres?

☐ Yes

☐ No

Comment:

25. If 'Yes', do you have any concerns about these settings (safeguarding/health and safety/suitability of educational experience) on offer?

EHE Services in your Local Authority

In order to help ADCS understand how EHE services are provided in your authority, please tell us...

26. What was the budget/actual spend on co-ordinating and monitoring EHE services in your authority in the last full academic year (2016/17)?

Budget Spend £

Actual Spend £

27. What is the number of FTE staff working in your area on co-ordinating and monitoring EHE?

28. Which team within the wider children's services department does EHE sit in?

Additional Comments

29. Any further comments?

30. About you - **please leave your name and email address if you wish to be informed of the outcomes of this work.**

LA or type of LA and region
(i.e. unitary in the North
West)

Name

Email address

Thank you for taking the time to complete this survey.

Home Education

In recent years there has been a steady and significant increase in elective home education. Currently we know that some 45,500 children in England and Wales are registered with local authorities as home educated either as reported by schools, who have a legal duty to inform the LA when a child is taken off roll to home educate, or parents who choose to inform their local authority if the child has never attended a school. There is no requirement for parents to register a child who has never attended school so we can only make an informed guess at the total number. It is thought the total of all children in elective home education will be about 60,000.

In one county (Hampshire) they have 1422 electively home educated children and that figure has tripled over the last five years. We not only have little knowledge of the numbers of children but also of the quality of education they are receiving and whether they are at risk in any way. There is a need for more research in this area.

The majority of parents who choose to home educate are doing so in an informed and responsible way. These are the parents who need minimum help but it is not the whole story. Parents have important rights that must be protected when making decisions about their child's education but children also have rights and those rights must be carefully balanced with the rights of parents.

There are many parents who take their child out for home education and then find it difficult and are unable to deliver the quality of education necessary. Children in this situation are often returned to school having been absent for significant periods. These parents could, with help, make home education a success and avoid the disruption for both school and child of a return to school after a period of absence.

Some children are removed for home education because the parent feels the school or education authority are failing their child. This is especially true for children with special educational needs. Here we really must do better and if a child has been failed by the education department then it is vital that we give additional support.

Finally, there is a very worrying but hopefully small group of children who are at risk either of failing to get anything resembling adequate education or in some extreme case of children being at risk either of radicalisation or of sexual or physical abuse.

With increased awareness of child abuse it seems likely that a small minority of children are removed from school by a parent who seeks to hide signs of abuse. We know of cases where children have been removed from school and then seriously ill-treated. We cannot ignore the dangers here. Equally we have to be much more vigilant about the dangers of radicalisation.

The first essential step is to put a duty on local education authorities to create a register of all children out of school. My Bill will put a duty on the local authority to visit the family and child to ensure the child is being educated but this should not be seen as a negative duty. The idea is to offer help where it is needed. This does not mean a prescriptive instruction to home educating parents; it does mean ensuring the child is receiving an education and is safe and not being radicalised or ill-treated.

If, as I hope my Bill is given a second reading I will propose changes to some of the detail to make sure we are getting the right balance for parents and child. That will be the committee stage probably early next year so I will be taking advice and listening carefully to experts, parents and children,

This is too important an area of educational policy to ignore any longer.

Dear Lord Soley

Re Private Members Bill -EHE

I have circulated and collated the views of AEHEP members.

Title: **"Standards and welfare of children in home education"** bill

The rationale being the current emphasis across education and children's services is around standards and welfare. Pupil progress in school is measured partly to ensure standards are reached but also to hold schools to account for outcomes. There is an argument that parents should also be accountable. The welfare of pupils is critical especially around the push for improved mental health where many EHE pupils are suspected of being isolated and in effect 'invisible.' We thought keeping 'safeguarding' or 'protecting' out of the title would be wise as this would possibly draw criticism from the powerful pro EHE lobby groups.

We recognise parents have a right to home educate 'subject' to the local authority being satisfied that the child is receiving sufficient education. Another way to achieve this would be to add a clause to the Education Act 1996 stating that 'education otherwise' includes home education. We have tried to keep any change of law as simple as possible but essentially want to be able more easily to know if a child is receiving a suitable education.

Clauses:

- A compulsory registration scheme maintained by individual local authorities capturing all home educated children and reported to the DFE on an annual basis (currently the DFE have no idea of numbers of EHE pupils)
- confirming that provisions relating to LAs should uphold the best interests of the child and give specific powers, e.g. the monitoring powers - such as the LA's right to see the child and the child's work in order to determine standards and welfare
- The voice of the child to be heard. A requirement to meet face to face at appropriate intervals, with sensible maximum and minimum time limits, with a LA representative to provide information relating to the education being provided by the home educator. This should be evidenced based, not a verbal description.
- All parents should respond to enquiries from the LA in order to determine that education at home is suitable.
- Parents can expect to be given the opportunity to address any specific concerns and LA's can expect parents to provide further information as requested.

Guidance: please see the attached document. Updating the guidance is a good idea but should happen in tandem but separate from the need to legislate. Revising guidance does not require new legislation but strategically simply asking for clarification of the current law in the guidance is perhaps something that could be seen as a compromise position?

The following is an example of how under the current law and guidance some parents can evade their responsibilities:

"I have been calling around in the last few weeks and have been bounced from one person to the next. I have been most recently told I need to speak to you so I hope you can help me. I am 21 years old and concerned about my younger sisters who are 16 and 13 who live separately from me with my mum. From my knowledge, she has had various visits from education authorities regarding her plans to home school the children herself. I have heard her on numerous occasions mention that she has presented work that has been completed herself in order for there to be no further intervention. The older sibling has no plans to complete her GCSEs any time soon and I am aware they would be due to sit this year. My mother's intentions may be good but I worry that she cannot cope and am deeply concerned about my sisters' lack of education."

The changes we have suggested would result in cases such as this being more robustly addressed to the benefit of the child, parent and society.

I hope these ideas are helpful, I please do not hesitate to contact me should you require input from the AEHEP

Yours sincerely

David Harvey

Appendix 1

Amendments AEHEP Guidance March 17

	Current	Proposed
2.16	Section 53 of the Children Act 2004 ("the 2004 Act") sets out the duty on local authorities to, where reasonably practicable, take into account the child's wishes and feelings with regard to the provision of services. Section 53 does not extend local authorities' functions. It does not, for example, place an obligation on local authorities to ascertain the child's wishes about elective home education as it is not a service provided by the local authority.	Section 53 of the Children Act 2004 Act sets out the duty on local authorities to, where reasonably practicable, take into account the child's wishes and feelings with regard to the provision of services. Section 53 does not extend local authorities' functions. However, good practice and equitability between the rights of children educated at school and those educated otherwise would require local authorities to capture and record the voice of children educated at home.
2.3	The responsibility for a child's education rests with his or her parents. An "efficient" and "suitable" education is not defined in the Education Act 1996 but "efficient" has been broadly described in case law ¹ as an education that "achieves that which it sets out to achieve", and a "suitable" education is one that "primarily equips a child for life within the community of which he is a member, rather than the way of life in the country as a whole, as long as it does not foreclose the child's options in later years to adopt some other form of life if he wishes to do so".	The responsibility for a child's education rests with his or her parents. An "efficient" and "suitable" education is not defined in the Education Act 1996 but "efficient" has been broadly described in case law ¹ as an education that "achieves that which it sets out to achieve", and a "suitable" education is one that "primarily equips a child for life within the community of which he is a member, rather than the way of life in the country as a whole, as long as it does not foreclose the child's options in later years to adopt some other form of life if he wishes to do so". In line with this definition there will be an expectation that provision within the home include supervised instruction in reading, writing and numeracy which takes into account the child's age, ability, aptitude and any SEND. "We regard the fundamental academic skills of writing, reading and arithmetic as fundamental to any education for life in the modern world.....We should not in the ordinary case regard a system of education as suitable for any child capable of learning such skills, if it failed to instil in the child the ability to read, write or cope with arithmetical problems". (Harrison and Harrison v Stevenson)

2.6	<p>Local authorities have a statutory duty under section 436A of the Education Act 1996, inserted by the Education and Inspections Act 2006, to make arrangements to enable them to establish the identities, so far as it is possible to do so, of children in their area who are not receiving a suitable education. The duty applies in relation to children of compulsory school age who are not on a school roll, and who are not receiving a suitable education otherwise than being at school (for example, at home, privately, or in alternative provision). The guidance issued makes it clear that the duty does not apply to children who are being educated at home.²</p>	<p>Guidance on local authorities duties under section 436A of the Education Act 1996. The last sentence in para 2.6 states that 'The guidance issued makes it clear that the duty does not apply to children who are being educated at home'. The guidance referred to here, in footnote 2, was replaced in 2009 and the new guidance made clear that the section <i>did</i> apply to EHE. It stated that:</p> <p style="padding-left: 40px;">In order to comply with this duty local authorities need to make arrangements which will as far as possible enable them to determine whether any children who are not pupils at school, such as those being educated at home, are receiving suitable education. In order to do this local authorities should make enquiries with parents educating children at home about educational provision being made for them'</p> <p>The 2009 guidance was subsequently replaced in November 2013 and this current guidance, similarly makes clear that the duty <i>does</i> apply to EHE, by referring to it explicitly (page 5) and, generally, by advising that: 'The LA should consult the parents of the child when establishing whether the child is receiving suitable education' (p4).</p> <p>Could para 2.6 be amended to reflect the current position?</p>
2.7	<p>Local authorities have no statutory duties in relation to monitoring the quality of home education on a routine basis.</p> <p>However, under Section 437(1) of the Education Act 1996, local authorities shall intervene</p>	<p>Local authorities have no statutory duties in relation to monitoring the quality of home education on a uniform basis. Local authorities should though be able to ascertain that families are still living in their area and provision is continuing by receiving updates. Parents are expected to provide initial information regarding their provision at home at the point of deregistration or upon becoming known to the local authority in the case of children not previously on roll at school. This</p>

		<p>information should be updated at regular intervals.</p> <p>However, under Section 437(1) of the Education Act 1996, local authorities shall intervene</p>
2.8	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures. Parents are under no duty to respond to such enquiries, but it would be sensible for them to do so.</p>	<p>Prior to serving a notice under section 437(1), local authorities are encouraged to address the situation informally. The most obvious course of action if the local authority has information that makes it appear that parents are not providing a suitable education, would be to ask parents for further information about the education they are providing. All parents should respond to informal enquiries in order to assist local authorities to determine that education at home is suitable. Such a request is not the same as a notice under section 437(1), and is not necessarily a precursor for formal procedures.</p> <p>Philips v Brown case law would support this change</p>
3.4	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents should be given the opportunity to address any specific concerns that the authority has. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way. Parents are under no duty to respond to such requests for information or a meeting, but it would be sensible for them to do so.</p>	<p>Local authorities should acknowledge that learning takes place in a wide variety of environments and not only in the home. However, if it appears that a suitable education is not being provided, the local authority should seek to gather any relevant information that will assist them in reaching a properly informed judgement. This should include seeking from the parents any further information that they wish to provide which explains how they are providing a suitable education. Parents can expect to be given the opportunity to address any specific concerns and local authorities can expect parents to provide further information as requested. The child should also be given the opportunity, but not required, to attend any meeting that may be arranged or invited to express his or her views in some other way.</p>

3.6	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in the vast majority of cases, be able to discuss and evaluate the parents' educational provision by alternative means. If they choose not to meet, parents may be asked to provide evidence that they are providing a suitable education. If a local authority asks parents for information they are under no duty to comply although it would be sensible for them to do so.</p>	<p>Some parents may welcome the opportunity to discuss the provision that they are making for the child's education during a home visit but parents are not legally required to give the local authority access to their home. They may choose to meet a local authority representative at a mutually convenient and neutral location instead, with or without the child being present, or choose not to meet at all.</p> <p>Where a parent elects not to allow access to their home or their child, this does not of itself constitute a ground for concern about the education provision being made.</p> <p>Where local authorities are not able to visit homes, they should, in all cases, be able to discuss and evaluate the parents' educational provision by alternative means. Parents will be asked to provide evidence that they are providing a suitable education. Parents might prefer, for example, to write a report, provide samples of work, have their educational provision endorsed by a third party (such as an independent home tutor) or provide evidence in some other appropriate form.</p>
3.15	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>consistent involvement of parents</p>	<p>In their consideration of parents' provision of education at home, local authorities may reasonably expect the provision to include the following characteristics:</p> <p>Supervised reading, writing and numeracy at a level appropriate to their child's age, aptitude, ability and any SEND</p> <p>consistent involvement of parents</p>