



Date: 6 October 21

To: Jeremy Miles - Minister for Education

Dear Mr Miles,

We are writing to submit to you **the enclosed rebuttal** of the unjustifiable use of the UNCRC by the Children's Commissioner for Wales in her February 2021 "Review of the Welsh Government's exercise of its functions." We also seek the opportunity to liaise with you to ensure that the home educating community is represented and treated as fairly and honourably as any other community within our society.

The Welsh Government states that it seeks to encourage, promote and celebrate diversity in Wales, advocating for a pluralistic and tolerant society.[1] Any such society has to have a diverse and pluralistic approach to education.

As home educators in Wales, we embrace this approach. A register of home educators is completely at odds with a tolerant and pluralistic society.[2] One would certainly never envisage mandatory registers for people on the grounds of their religious, political or philosophical beliefs or because of sexuality.

A tolerant society protects the clear legal principle of "innocent until proven guilty," by adopting a reactive stance to the investigation of any potential crime or infringement of the law. One does not take action against subgroups of the community without evidence, "just in case" there *might* be a risk of harm to individuals or the community; the authorities only act if there are reasonable grounds to believe there *is* risk of harm, and any measures taken have to be reasonable and proportionate.

Evidence would be required that home educated children were at significantly increased risk of harm, such as abuse and neglect, in order to justify registration. There is no such evidence. Indeed, research has shown that home educated children are statistically at significantly *less* risk of abuse and neglect within the home than their school educated peers.[3]

Furthermore, home educated children are not at risk from the considerable rates of peer and adult-mediated sexual, physical and emotional abuse which the Welsh Government are starting to acknowledge occur so frequently in school-based education.[4] The concept of alleged "visibility" cannot possibly be taken as a safeguarding gain when schoolchildren are "seen" and a register taken on a daily basis, and yet so many of them still suffer from abuse and neglect

We would welcome further opportunity to familiarise you with our experiences of the wonderful diversity of educational approaches being used by home educators. We look forward to a change of narrative in future, accompanied by a more constructive dialogue between the Government and home educators here in Wales.

*Families First in Education Wales*

---

#### References

- 1] Curriculum for Wales guidance - page 42, "Diversity" paragraphs 1 & 2  
<https://hwb.gov.wales/api/storage/afca43eb-5c50-4846-9c2d-0d56fbffba09/curriculum-for-wales-guidance-120320.pdf>
- 2] Forcing homeschooling parents to sign up to register 'risks treating them like sex offenders'  
<https://www.dailymail.co.uk/femail/article-9783345/Forcing-homeschooling-parents-sign-register-risks-treating-like-sex-offenders.html>
- 3] Home Education and the Safeguarding Myth: Analysing the Facts Behind the Rhetoric  
<https://www.educationotherwise.org/home-education-and-the-safeguarding-myth-analysing-the-facts-behind-the-rhetoric>
- 4] Inspectors to visit schools as part of sexual harassment review - Wales Online  
<https://www.walesonline.co.uk/news/education/sexual-harassment-schools-wales-review-21571540>