



**Families First  
in Education Wales**

Website: [familiesfirst.wales](http://familiesfirst.wales)

Email:

Date: 8 April 2024

To: [ElectiveHomeEducation@gov.wales](mailto:ElectiveHomeEducation@gov.wales)

Cc: [Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@gov.wales)

Dear Equity in Education Team,

Thank you for forwarding the children and young person's version of your consultation document *Children Missing Education Database*. We shall not be encouraging home educated young people to use the Child friendly versions [CFVs] of the consultation on Children Missing Education databases as things stand, for the reasons listed below:

1. The CFVs have not been published on the Consultation webpage or made generally available, despite the fact that the consultation has already been going on for over two out of the proposed three month consultation period.
2. No local authority in Wales has informed home educators already known to them about the CFVs.
3. Home education groups were only informed about the CFVs some two months after the consultation began, limiting time for responses.
4. There is no return address on the forms.
5. There is no information on the CFVs to explain what the data collected by the CFVs will be used for, and it is not clear that there is a WG consultation into which responses will be fed.
6. The CFVs stigmatise Electively Home Educated [EHE] children by showing them as ghost figures.
7. The CFVs are not directed towards home educated children, nor are they aimed at any alleged "ghost" children depicted in the imagery, yet these are the young people it is said that the proposals are being introduced to support.
8. The wording of the CFVs gives the impression that if a child is not on a LA database, they are automatically at risk. This is discriminatory and divisive. Such children are already "known" to many people in other areas of society and of course to their own family, who are primarily responsible for them.
9. The CFVs seem to be targetted at the children who are least affected by the proposals. For example, the majority of children depicted in them are clearly dressed for school or college, thus giving a subliminal message to those responding that to be happy, safe and learning, a child *has to be* in school, yet EHE has the same standing in legislation as school attendance.
10. The CFVs are one-sided. The information is presented in a biased way, providing respondents with only a narrow perspective of the proposals. There is no discussion of risks or of counterarguments and concerns.
11. The CFVs fail to draw respondents' attention to the fact that sharing any data about children from medical records *without their or their parents' consent* would create barriers, risking children not being "known" to healthcare sources as well as to councils, or, more frequently, inhibiting helpful free and open communication between healthcare professionals and families.
12. The wording of the questions in the CFVs is leading. The CFVs tell children and young people that this "will happen." They do not ask if it *should* happen.
13. There is no information on the CFVs to explain what the data collected will be used for, and it is not clear that there is a WG consultation into which responses will be fed.
14. There is no mention in the CFVs that data on adults other than a child's parents would also be collected. This would potentially include: leaders of youth clubs & groups, such as Scouts/Guides/Brownies/Cubs, swimming/sports teachers and coaches; music teachers; Sunday school teachers & religious leaders; other home educating parents (when families take part in shared learning activities); grandparents of home educated children; community volunteers who provide educational activities; and the like.

Further, we are also both concerned and confused by the fact that the CFVs appear to have been in circulation prior to them being shared with home education groups. It seems probable that the networks used by WG to consult with young people have not reached out to those who would be impacted the most by the measures proposed. Sending the CFVs to EHE representatives at this late stage seems like an afterthought.

We have recently been made aware from other sources that online forms are available for the collection of responses:

Enligh [sic]- <https://forms.office.com/e/CzGuYzt29V>

Welsh- <https://forms.office.com/e/OEEw2R7tur>

There is no indication on these forms as to which organisation is collecting the data submitted, how it will be processed, nor any means for the respondents to identify how they are currently being provided with an education. There is no privacy statement on the forms other than a generic one from Microsoft stating, "Microsoft is not responsible for the privacy or security practices of its customers, including those of this form owner."

The forms also enhance the impression that this part of the consultation is biased towards children educated in schools, for they state "If you are a pupil, ask a member of staff for this document." Admittedly, they acknowledge that some young people will have received them by email, but that too probably excludes EHE young people; as stated above, to the best of our knowledge LAs have not been sending them to EHE families with whom they are in contact.

The only contact information on the forms is an email address belonging to the Children in Wales domain. What is this organisation's relationship with the Welsh Government? How will the data collected be processed? How will it be reported? We note that there was a similar CFV in English published as part of the 2020 Government consultation web page, though no CFV responses were included in the Interim response (published Feb 2021) nor was any clear reference made to them in the Summary of responses (Oct 2021).

In view of all the above points, we ask that both versions of the CFV documents be withdrawn immediately. Responses elicited by means of the CFVs should be disregarded, as they will be based on unreliable information. Should balanced CFVs be considered desirable, then replacements which do not exhibit conscious or unconscious bias should be prepared and trialled with young people, including those who are electively home educated. Then a further consultation period should be opened up for children and young people to respond *in their own time*, (i.e. not under the supervision of school staff,) and the Government's response to the rest of the consultation delayed until all CFV submissions have been processed and included in the documentation.

We look forward to your considered response to the above concerns. Please note that, given the lack of time before the consultation closes, we shall be posting a copy of this letter on our website without delay. For the sake of transparency, we will also make any replies we receive from your department available there as well.

Yours sincerely,

*Families First in Education Wales*