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Evaluation of the elective home education statutory guidance

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Evaluation of the elective home education statutory guidance

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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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Glossary

Attention Deficit Hyperactivity Disorder (ADHD)

A neurodevelopmental disorder defined by impairing levels of inattention, disorganisation, and/or hyperactivity-impulsivity.

Additional Learning Needs (ALN)

A person has additional learning needs if they have a learning difficulty or disability (whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for additional learning provision.

Additional Learning Provision (ALP)

Educational support that is additional to, or different from, what is generally available to others of the same age in mainstream school settings.

Autistic Spectrum Disorder (ASD)

The features of autism spectrum disorder include

- persistent deficits in reciprocal social communication and social interaction
- restricted, repetitive patterns of behaviour, interests or activities
- symptoms which cause clinically significant impairment in social, occupational or other important areas of functioning and that
- these disturbances are not better explained by intellectual disability or global developmental delay.

Child and Adolescent Mental Health Services (CAMHS)

A National Health Service (NHS) that helps children and young people with emotional, behavioural and mental health difficulties.

Children Missing Education (CME)

These are children of compulsory school age who are not registered pupils at a school, are not being educated at home and are not receiving any alternative provision.

Elective Home Education (EHE)

A term to describe where parents or guardians have decided to provide education at home instead of sending their child/children to school full-time.

Education otherwise than at school (EOTAS)

This is any education provided in various settings other than traditional school environments that is provided by local authorities (i.e., the local authority has financial responsibility for it). It can include hospital schools, pupil referral units, independent special schools, e-learning and provision through third-sector organisations.

Education supervision order (ESO)

This order requires parents and their child to follow directions made in the order to work with a local authority supervising officer to improve their child's attendance at school.

Full time equivalent (FTE)

A unit of measurement to show the total hours worked by an employee.

General Certificate of Secondary Education (GCSE)

An academic qualification taken by students in a wide range of subjects, typically at the end of Year 11.

Individual Development Plan (IDP)

This sets out a child or young person's Additional Learning Needs (ALN) and the Additional Learning Provision (ALP). It is a legal document, and the ALP must be documented within an IDP. It is a legal entitlement under the new ALN system in Wales. It is a person-centred document which is developed with input from the child and their parents/carers or professionals. It must be reviewed at least annually.

Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+)

An acronym used to describe the gender identity and sexual orientation of people.

Local authority (LA)

This refers to the relevant council that is responsible for providing local government services within a certain area e.g. health, social care, education.

Montessori education

A child-led education approach which emphasises self-directed learning rather than formal teaching.

Not in Education, Employment or Training (NEET)

A young person aged 16-24 is defined as not in education, employment or training if they are not engaged in any form of education, government-supported training or employment. This includes those who are unemployed and actively seeking work, and those who are economically inactive and not seeking work.

Pastoral Support Plan (PSP)

This is a school-based intervention designed to help students who are at risk of exclusion or who are experiencing significant challenges at school whether academic, behavioural, emotional or social.

Pupil level annual school census (PLASC)

A yearly collection via an electronic census, typically conducted in January, of individual pupil data in Wales.

Pupil Referral Unit (PRU)

An alternative education setting specifically designed for students who struggle to succeed in a traditional school environment.

School attendance order (SAO)

If, a local authority remains unsatisfied that a parent has evidenced the provision of a suitable, full-time education they are expected to write to the parent and inform them of the intention to serve a School Attendance Order (SAO).

United Nations Convention on the Rights of the Child (UNCRC)

An international human rights treaty adopted in 1989 which outlines the fundamental rights of all children.

Welsh Joint Education Committee (WJEC)

An examination board that provides academic and vocational qualifications in Wales.

1. Introduction and background

1.1. Background

OB3 Research, in collaboration with Miller Research, was appointed by the Welsh Government in March 2025 to undertake an evaluation of the [Elective Home Education \(EHE\) statutory guidance](#). The aim of the evaluation was to explore the effectiveness of the EHE statutory guidance, examine whether local authorities considered their position to 'see' and communicate with the child to have been strengthened following the publication of the guidance and to find out whether any amendments were needed to improve the guidance.

The main purpose of the evaluation was to assess:

- the effectiveness of the guidance in supporting local authorities to carry out their duties in relation to EHE
- whether local authorities had changed their EHE processes in response to the guidance
- the extent to which the statutory guidance is effective in strengthening the position of local authorities to 'see' the child in the home, to determine receipt of suitable education
- whether local authorities had seen more children as a result of the guidance
- whether local authorities had experienced issues applying the guidance
- any proposed amendment to the guidance that might help local authorities address any current issues
- any examples of successful practice that could be shared by local authorities to inform others.

1.2. Legislative and policy context

Education is a fundamental right for every child, essential for their development, well-being, and future opportunities. This is underpinned by the [principles of the United Nations Convention on the Rights of the Child \(UNCRC\)](#) which were adopted by the United National General Assembly in 1989 and ratified by the UK in 1991. Article 28 of the UNCRC declares the right of all children to receive an education and Article 29 declares that education should develop each child's personality and talents to the full.

Local authorities and parents have a statutory duty to ensure that children receive an education. Section 7 of the [Education Act 1996](#) states that parents are legally required to ensure their child receives an 'efficient full-time education', suitable to the 'age, ability and aptitude' of the child.

Section 436A of the Education Act 1996 places a duty on local authorities to make arrangements to establish the identities of all statutory school age children living within their

areas who are not registered learners at a school and to act if it appears that they are not in receipt of a suitable education. There is an expectation in the Education Act 1996 that local authorities do all that is reasonable, practicable and appropriate to identify children in their area who are of compulsory school age and not receiving a suitable education.

The [Education \(Wales\) Act 2014](#) outlines the responsibilities of both local authorities and parents regarding children's education.

Since its establishment, the Welsh Government has committed to ensuring that all children receive a suitable education and [Education in Wales: Our National Mission \(2023\)](#) reinforced this commitment. The commitment was further emphasised in [Our national mission: high standards and aspirations for all](#) which sets out to achieve high standards and aspirations for all 'by supporting every learner'. The principles set out in Our National Mission apply to all children, including those who are home-educated.

The [Well-being of Future Generations \(Wales\) Act 2015](#) promotes a more equal Wales by supporting an inclusive, equitable education system where all children are supported to overcome barriers to learning and participation.

1.3. Elective home education

The [elective home-education \(EHE\) statutory guidance for local authorities](#) was published in May 2023 and replaced the non-statutory guidance that was previously in place. It was developed to support local authorities to exercise their functions to make arrangements to establish the identities of those children not receiving a suitable education.

As stated in the statutory guidance, education is compulsory, but school attendance is not. Elective Home Education (EHE) refers to situations where families choose to educate their children at home rather than sending them to school. As the guidance explains, families can make this decision for a wide range of reasons, and many feel they are better able to meet their child's educational needs outside of a classroom environment.

The guidance acknowledges that although there is no legal definition of what constitutes a full-time education, it is generally understood to take up a significant proportion of the child's time. It further states that home-educated children are not required to follow the Curriculum for Wales or meet a minimum number of learning hours. The guidance recognises that approaches to home education are highly varied and tailored to the individual needs and interests of each child. There is no single way to provide home education; it can be formal and structured with a timetable, or more autonomous, flexible and child-led.

Parents do not need formal qualifications to home educate. They may choose to teach their child directly, employ a tutor, make use of online learning, or arrange for their child to learn in groups alongside other home-educated children. The guidance states that any arrangement where five or more learners (or one learner of compulsory school age is looked after, has an ALN statement, an individual development plan (IDP) or an education, health and care plan) are educated at a single location other than a maintained school, this may fall in the scope of an independent school which must be registered with the Welsh Government.

The guidance states that local authorities can assess the suitability of the education provided by parents, and it is not unreasonable for local authorities to ask parents about their approach and the education being delivered. Assessing suitability of education is not about measuring a child's attainment or testing their abilities in any way.

The guidance notes that a suitable education would include provision in numeracy, literacy and language skills suitable to the child's age, ability and aptitude and meeting any additional learning needs (ALN) the child may have.

The guidance has not changed local authorities' duties in relation to EHE. However, several aspects were strengthened to clarify the legislation, and the role and responsibilities of local authorities and parents under the current legislative framework. These aspects were:

- clarity in terms of roles and responsibilities - the guidance provides greater detail to parents about what constitutes a 'suitable education' and outlines the types of evidence local authorities may request to assess educational progress, and in offering support to home-educating families and maintaining communication
- balancing parental autonomy and local authority oversight - an important aspect of the guidance is its balance between respecting parental autonomy in choosing home education and ensuring that children's educational and welfare needs are met
- safeguarding and child welfare - the statutory guidance underlines that local authorities have a duty to safeguard children
- support for home educators - the guidance stresses that local authorities should adopt a supportive approach, offering information and advice to home-educating families, rather than concentrating solely on monitoring and enforcement. This is in line with the Welsh Government's broader focus on inclusion and providing tailored support to meet the needs of diverse educational settings.

The Welsh Government committed to evaluating the impact of the guidance once local authorities had been given a suitable period of time to be able to fully embed it.

At the start of chapters three to seven, we outline in further detail the relevant sections of the statutory guidance to provide context for the findings drawn from our fieldwork with local authorities.

2. Methodology

2.1. Approach

The work programme for this evaluation was conducted across 4 stages.

The first stage was an inception meeting with the client to agree the approach and timetable and gain access to the relevant documentation.

Stage 2 was analysis of existing data and research. This included desk-based research of existing policy and strategy documents [outlined in section 1.2] including the published EHE guidance and supplementary materials.

During this stage scoping interviews were also held with 2 policy leads at Welsh Government to ensure a sound understanding of the current situation, explore any further research or data that might provide further context to the evaluation and to agree upon the themes and questions to be covered during the fieldwork with local authorities.

Stage 3 of the methodology included the development of a discussion guide to be used during primary research with each local authority in Wales – to include EHE lead officers and other relevant local authority staff as necessary (such as Education Welfare Officers or Additional Learning Needs (ALN) leads). A data sharing template requesting EHE data as reported to the Pupil Level Annual School Census (PLASC) for January 2025 was also prepared. Draft research tools and a bilingual privacy notice were shared with the client for comment and sign-off prior to starting the fieldwork phase. The privacy notices were hosted online and a hyperlink shared with all fieldwork contributors within the initial invitation to interview.

Invites were sent via email to the lead EHE contact at each local authority, to 2 relevant teaching unions representing headteachers and school leaders, and the Children's Commissioner for Wales office.

Semi-structured interviews were secured with representatives from all 22 local authorities and a teaching union between mid-April and mid-July.

Each interviewee was sent an initial email invite outlining the purpose of the evaluation and the requirements for interview. The discussion guide and data sharing form were also sent to contributors in advance of the interview. Up to 2 follow-up email reminders were sent to contributors as required. All interviews were held via Teams either as one-to-one discussions or small group discussions (see copy of the discussion guide in Annex A of this report). In total, 34 individuals contributed their views during the qualitative fieldwork phase.

Upon completion of the fieldwork, stage 4 of the evaluation included analysis of the fieldwork. Responses to questions in the discussion guide were added to an Excel analysis framework, with each question analysed, and relevant information added under the appropriate headings throughout. The thematic coding in a question-led framework enabled

direct comparison of answers to the specific research questions (e.g. whether local authorities felt their ability to 'see' children was strengthened) and helped to extract examples.

The report is structured around the objectives outlined in the specification (see bullet points in section 1.1). The draft report was subject to an internal peer review prior to submitting it to the client and redrafted following receipt of comments.

2.2. Methodological considerations

Whilst a mixed-methods approach was used for this research, combining qualitative semi-structured interviews (covering operational practice, interpretation of the guidance, and examples) with a structured five-question quantitative snapshot from local authorities, it mainly relies on qualitative responses provided during interviews.

Several local authority practitioners noted that the children 'seen' figures vary over the course of the academic year as visits are scheduled, so a January snapshot may under- or over-represent activity depending on local timetabling. Interviewees reported differing interpretations of guidance terms (for example, what constitutes 'seeing' the child or acceptable evidence), which affects how monitoring categories are applied. These issues were raised by local authority respondents during interviews and in the data returns themselves.

The qualitative fieldwork draws on extensive perspectives given that interviews were secured with representatives from all 22 local authorities. This provides full national coverage of practitioner perspectives.

Fieldwork responses reflected a range of roles within local authority teams (EHE officers, coordinators, team managers and senior managers), and in several local authorities more than one practitioner contributed to the discussions. The variety of roles represented was valuable: operational officers provided detail on day-to-day practice and data recording, while managers offered a strategic view of resourcing and policy decisions. However, the perspective offered by any single local authority therefore depended on who participated, and this shaped the level of detail and historical knowledge available in each interview.

A small number of interviewees were newly in post following implementation of the May 2023 statutory guidance. Those respondents were often able to describe current processes and the operational impact of recent local changes but frequently found it difficult to compare the current situation with the period immediately before the guidance (pre-May 2023).

The local authority discussion guide covered many detailed questions and, in several cases, it was challenging to cover the full set within the standard one-hour interview slot. This was identified as an issue and therefore the discussion guide was sent to participants in advance and local authority contacts were made aware that interviews could overrun - particularly for small-group meetings where multiple contributors wished to add detail. Despite this, some interviews reached the scheduled time limit before all questions were fully explored. In those

instances the research team either arranged short follow-up interviews or invited additional written responses by email to ensure any outstanding points were captured.

The advance circulation of the guide helped participants prepare evidence and documentation, which frequently improved the quality of answers even when time was limited. Where follow-up contacts or written responses were obtained, they were integrated into the analysis and treated as equivalent to interview material.

The focus of this evaluation was to gain the views of local authority staff. As such the analysis can only reflect practitioner views, operational challenges, and examples of practice, and the views of families or learners cannot be triangulated. This is an important limitation when interpreting claims about family motivations or how acceptable families find the guidance. It should be noted that EHE families have provided their views in the [consultation on the statutory guidance and the handbook for home educators undertaken in 2019.](#)

Findings are presented with qualifying language as follows:

- few (less than 10%)
- several (less than 20%)
- some (more than 20% but fewer than 50%)
- many (around half)
- a majority (more than 50% but fewer than 75%)
- most (more than 75%)
- vast majority (nearly all responses with some having a different opinion)
- almost all (all respondents, or the vast majority who responded gave similar answers and the rest did not comment).

Wherever possible claims are quantified to the number of authorities that provided evidence. The qualitative evidence has been used where possible to explain patterns observed in the quantitative data returns (e.g. why some local authorities saw more children).

Draft analysis underwent internal peer review and redrafting to test interpretation and reduce analyst bias.

3. Findings: current situation

3.1. Policy context

The EHE statutory guidance outlines expectations for local authorities to collect and utilise data to inform the development of their policies and practices on home education, to better understand the reasons why some families choose to home educate and put in place appropriate support and advice.

The guidance also states that local authorities are expected to provide clear and accurate written information on their policies on their website on a page specifically for home education, including contact details for home education support organisations where available. They should also provide parents who are, or are considering home education, with a named contact within the authority who is familiar with home education policy and practice.

The guidance sets out that local authorities are expected to report to relevant scrutiny committees and elected members on home education matters at least annually. It is also noted in the guidance that each local authority should have a named senior officer with responsibility for home education policy and procedures. The guidance states that local authorities are advised to review these procedures regularly and that home education organisations, parents and children should be involved in the review process.

3.1.1. Welsh Government annual funding to support delivery of EHE services

The Welsh Government confirmed that additional funding to support local authorities with their existing statutory EHE duties, had been approved in 2021. Funding terms were agreed and allocated for 3 academic years: 2021/22, 2023/23 and 2023/24. The funding was extended for a further year in 2024/25. Funding is subject to set terms, with local authorities required to submit a report annually.

This funding includes an annual fixed £50,000 sum and an additional pro-rata allocation based on the number of children known to be receiving EHE in each authority. The EHE funding is now part of the Local Authority Education grant.

Local authorities are expected to use this funding to maintain accurate records of children receiving EHE, provide support and guidance to EHE families, monitor educational outcomes, engage with EHE families, and report on how the funding has been used to the Welsh Government.

The fixed £50,000 allocation is provided to local authorities to enhance their existing staffing capacity for elective home education and support them with the implementation of the statutory guidance.

3.2. Current situation

All local authorities were asked to complete a data collection template as part of this study. In all, 21 of the 22 local authorities returned the data collection form which provided information as per their January 2025 data capture position. This data is set out at Table 3.1. It shows that a total of 7,146 EHE learners were recorded by 21 local authorities as of January 2025. Of these, 63% were deemed to have a suitable and efficient education and 35% had been seen and spoken with.

A total of 288 EHE learners were classified as CME across 18 local authorities who provided this data. This varied from a high of 65 EHE learners missing education in one local authority area to no such cases in another authority area where it was considered that all EHE learners were having a suitable education.

In all, 17 local authorities provided data about the rate of EHE learners per 1,000 pupils across their local authority. These rates ranged from a high of just over 26.7 per 1,000 pupils in one local authority to a low of 9.7 per 1,000 pupils; averaging 19.8 pupils per 1,000 pupils across the 17 areas which provided data.

Table 3.1: Data on EHE learners provided by 21 local authorities

	Number
Number of EHE learners	7,146
Average rate of EHE learners per 1,000 pupils [17 local authorities]	19.8
Number of EHE learners seen and spoken with ^[footnote 1]	2,473
Number of EHE cohort being deemed as having a suitable and efficient education	4,475
Number of EHE cohort classified as CME [18 local authorities]	288

Source: Local authorities, as at January 2025

3.3. EHE role and responsibilities

The 34 local authority contributors who were interviewed for this evaluation typically undertook one of the following 3 roles:

- EHE officers who also held other job titles such as EHE Education and Support Officer, EHE Specialist Teacher, Education Welfare Officers (EWO) and Inclusion Officers

¹ This data includes children and young people seen and spoken with during home visits, virtually via Teams sessions as well as in-person events such as activities arranged by the local authority. One local authority noted that it also included children and young people seen and spoken with by other, non EHE, local authority officers.

- EHE co-ordinators and team managers who typically were responsible for EHE officers and EHE teams, but who often also held other wider departmental responsibilities relating to ALN or gypsy and traveller services
- Senior managers and heads of services such as those holding the roles of Heads of Education Welfare Services or Inclusion Services.

EHE officers reported that their responsibilities typically include responding to school de-registrations, arranging and conducting home visits, liaising with EHE families, and undertaking monitoring and reporting duties. In many cases, they are also involved in planning and coordinating EHE enrichment activities, as well as administering Welsh Government EHE funding for families.

EHE coordinators and team managers often have responsibility for developing EHE policies and managing EHE officers. Their roles also include attending Welsh Government meetings relating to EHE, preparing mandatory returns, and approving reports from home visits carried out by officers. In smaller local authorities these post holders may also be directly involved in frontline EHE work, including conducting home visits themselves.

Senior managers and heads of service reported having overall responsibility for EHE, alongside other education-related areas such as school attendance, Children Missing Education (CME), Education Other Than At School (EOTAS), safeguarding, Gypsy, Roma and Traveller services, Additional Learning Needs (ALN), service children, home tuition, and broader team management functions. In one case, a senior contributor noted that their role included legal responsibilities, such as managing formal actions and legal processes related to EHE.

It was very common for EHE officers and their line managers to be qualified teachers, with prior experience working in schools as both teachers and welfare officers. For example, in one authority with 2 EHE officers, the officers had respective teaching backgrounds in primary and secondary education. In another area, the EHE officer had previously worked as an Education Welfare Officer in a school setting.

Whilst no administrative staff contributed directly to the research as part of our fieldwork, many EHE officers and managers reported that they drew upon the support of these staff, either embedded within the EHE team or provided through the wider education service.

3.3.1. EHE management and accountability structure

Based on data shared during the fieldwork, a total of 45.4 full-time equivalent (FTE) posts are allocated to dedicated EHE roles across 22 local authorities, an average of just over 2 FTE roles per local authority area.^[footnote 2] Staffing capacity varies, ranging from a minimum of 1 officer (in 3 local authority areas) to a maximum of 3.5 officers in another which has a high number of EHE children. In some authorities, these roles are term-time only primarily because local authorities have appointed teachers who are on term-time only contracts to

² In calculating this figure, a full time term-time postholder has been counted as 1 FTE; and any part-time staff whose hours worked per week is unknown or estimated has been calculated as 0.5 FTE. The figure includes any vacant positions but excludes any agency staff.

undertake them. Additionally, 6 local authorities reported drawing on administrative support to supplement the core EHE team. In one case, an authority has employed agency staff to bolster internal capacity due to recruitment challenges. In another case, a part-time post has remained unfilled for the past year as a result of long-term health-related absence.

3.3.2. Working with families

Where EHE is pursued out of necessity rather than as a positive choice made by families due to factors such as ideological or philosophical beliefs, local authority staff highlighted the importance of:

- intervening early as soon as they suspect parents might deregister, to keep children in school if possible. These contacts typically take place within a 10 to 14 day window. In these cases officers such as Education Welfare Officers and Family Engagement Officers reach out quickly to identify the barriers to attending school and to explore alternatives to EHE. Officers often find that families cite unmet ALN needs, bullying or poor relationships with schools as their reason for leaving, and feel that these issues were not addressed before deregistering. In these cases, officers will work with colleagues such as the ALN team and inclusion colleagues to see what solutions can be secured, and if returning children to school is an option that parents want to consider
- building positive relationships with EHE families, by maintaining friendly and supportive relationships. Interviewees highlighted the importance of staff not appearing overly authoritative and developing relationships via phone and face to face, rather than via more formal emails or other written communication. Several local authorities noted that they reach out by phone in the first instance, as they find that they are better able to ascertain the real reasons for de-registrations in this way
- spending time with parents to allow them to make fully informed choices about whether EHE is appropriate for them and their child. This role involves spending time explaining what EHE involves, clarifying parents' roles and responsibilities, and challenging misconceptions such as the idea that the local authority will provide a tutoring service. During these conversations, staff will check if deregistration was truly in the child's best interest and explore options to address problems at school. In some cases an initial discussion is attended jointly by a EHE officer and a Family Engagement Officer
- providing information and resources such as the EHE guidance, as well as other resources such as an EHE Padlet, and signpost to other sources of support such as Careers Wales
- monitoring and follow-up conversations. Local authorities reported following statutory annual contact requirements but that this would often be supplemented by additional informal check-ins.

Several local authorities had experienced parental resistance to engagement and found that this was sometimes fuelled by EHE parent groups. It was reported that some parents use

standard deregistration letters downloaded from social media, often advised by EHE parent groups to refuse further contact. These template letters make it harder for local authorities to engage with families, check suitability of EHE, or address issues like bullying or unmet needs. One local authority thought that longer-established EHE families tend to be less keen to engage with the local authority whereas those families that are new to EHE are more likely to engage.

Where EHE isn't a positive choice made by families, EHE officers reported close engagement with a wide range of local authority staff and other partners, the most cited being:

- schools. When deregistration takes place, the EHE officer issues a form to the school to gather reasons for de-registering, including any concerns that they might have about the child's safeguarding, attendance or health
- social services and children's welfare service, in cases of non-engagement, undertaking safeguarding checks
- ALN staff who provide input to assess the need for ALN support or to review IDPs. In one authority, it was reported that a dedicated ALN officer attends person-centred planning (PCP) and IDP meetings
- local authority inclusion staff, particularly if the deregistration is due to issues such as bullying or a breakdown in school relationships
- youth services to access support such as mentoring or youth clubs
- Careers Wales. Depending on age, EHE families will be signposted as appropriate
- health and educational psychologists especially where anxiety or school phobia is an issue for the child
- admissions teams to help families access school places again if needed
- children's services for joint visits or in cases where there are safeguarding concerns.

Those interviewed highlighted the importance of taking a child-centred approach to resolving issues where EHE is not a positive choice. Contributors also highlighted the importance of taking a multi-agency approach when a decision about EHE is being taken, as this can support a managed move to another school rather than EHE.

3.3.3. Use of data

The fieldwork revealed that data is used effectively by most local authorities to identify EHE trends and patterns. Several authorities highlighted that the data was showing an increase in the number of EHE children across their area in recent years, which had, in some cases, helped to make the case for increased staffing resources within the EHE team.

Data is being used by local authorities to:

- track EHE entry and exit points. Local authorities commonly reported that they capture the reasons for withdrawing from schools and engaging with EHE as part of this tracking, which helps to target support appropriately
- identify schools with high deregistration rates. This helps to flag up potential 'hot spots' which can then be addressed by the authority and where learners can be encouraged to stay in school
- highlight concerning patterns, such as high Year 11 deregistration trends or schools that have more than 4% to 5% of their pupil cohort deregistering
- highlight seasonal patterns, such as high rates of deregistration before examination periods
- identify any geographical trends, which helps to identify areas which require targeted support. For instance, one authority had used data to identify the need for swimming clubs for EHE pupils across the county whilst another has used geographical data to inform the targeting of youth services
- identify shifts in the profile of EHE learners and their families. For instance, to identify if there are increases in numbers of EHE learners with complex needs, ALN, or from certain demographic backgrounds. One authority reported using the data to track patterns of EHE by ethnicity compared to the overall school population. Another authority reported that the data showed an increase in EHE learners with extremely complex needs.

EHE data is commonly used by local authorities to plan their annual programme of work, including sorting their EHE lists by the date of last contact to arrange home visits for the next academic year and to prioritise the visiting of particular cohorts, such as Year 11 learners. One local authority reported using a RAG³ rating approach to prioritise EHE cases for intervention. In this case, the local authority colour codes EHE children on their database: for instance, a red code highlights a safeguarding concern whilst a blue code identifies a new EHE.

The feedback from local authorities also showed that EHE data is frequently drawn upon to prepare reports and inform scrutiny committee discussions. EHE data is also used to raise issues at a strategic level within the authority, including with colleagues, at headteacher forums and safeguarding boards.

Furthermore, several local authorities use EHE data as part of their school improvement processes to escalate concerns if particular issues are identified. For instance, schools in 5 authority areas are challenged directly where their data shows disproportionate de-registration trends. One of these local authorities also adopts a RAG approach to code schools according to de-registration proportions whilst another authority also escalates the

³ Red, Amber and Green

issue with colleagues from the school improvement team. One local authority contributor described the process that they adopt:

“we collect data on where the children are coming off school roll...and we look into why that's happening. So where X number of children are coming off that particular school, are they being advised by teaching staff that they can home educate? Are they being discouraged? So we do a piece of work and we go into the school and just tease that out.”

In terms of using data to drive EHE process change or approaches within the local authority, some good practice examples were gathered over the course of the fieldwork:

- one authority had used EHE data to look at the destinations of their Year 11 cohort this year and worked with the local college to ease the transition into post-16 education, to enable them to accommodate their needs
- one authority reported that they had established a new panel for EHE which supported them to adopt more robust processes
- one local authority had improved their data capturing processes around de-registrations, which had led to improved insight into trends and patterns. In this case, the local authority has adopted Microsoft Forms rather than word documents for capturing information from parents and schools, which asked for the reasons why a child has left school:

“on the form we've made every question compulsory, so they can't submit the form without answering every question, whereas on the previous form we pretty much asked the same questions, but [only] some would fill in all of it. Some would fill in a bit, so we never got good detail. Every question answered, otherwise they can't submit.” As a result: “we found [de-registrations at] some schools were at 4% or 5% of their school population. And then there were other schools that were less than 1%, but what it showed is, well, this school is clearly encouraging or supporting or there's an issue which allowed us then to raise that and dig deeper into those conversations.”

Two local authorities thought that greater use could be made of their EHE data: in one of these cases, recent increased staffing capacity meant that this was now underway.

Four local authorities appeared to use their EHE data primarily for reporting purposes rather than to inform and change practice.

3.3.4. Use of annual contribution to EHE role

It was commonly reported by local authorities that the annual £50,000 Welsh Government funding to enhance existing EHE staffing capacity was used to fund a specific EHE officer role. In several of these cases the grant was acknowledged as being a ‘contribution’ towards the post, as it did not cover the full salary costs. This was often because local authorities had chosen to appoint teachers who were already on higher pay scales.

In 9 local authority cases, the funding was used to offset the costs of employing a team of officers, which often included the role of an EHE officer as well as administrative support. For instance, in 3 cases the funding was used to contribute towards the salaries of 2 posts - an EHE officer (or equivalent) and administrative support; in another it funded 2 EHE posts, 1 being full time and another part time; in another it funded an EHE officer and Family Liaison officer post; whilst in 2 other authority areas it contributed towards a larger team of between 3 and 4 FTE members.

In 4 cases the Welsh Government funding contribution was reported to have directly helped to increase the authority's capacity and in these cases it was noted that the funding had helped to make an additional EHE officer role possible. In a fifth authority, the EHE team had been expanded in anticipation of the grant funding being awarded. The additional capacity put in place across these areas was often reported to have helped built relationships with EHE families over time, not least because the EHE officers had greater capacity to visit and arrange activities for EHE families.

In other cases the local authority had been unable to expand their capacity as the funding had been used to maintain current staff levels, despite having seen recent increases in the number of EHE learners.

Some caution was expressed that the funding awarded for 2024/25 was only for a one-year period, and longer-term funding arrangements are preferred by local authorities.

3.3.5. Process change since statutory guidance was introduced

The research found that statutory guidance has not uniformly driven change across local authorities, largely due to its lack of enforceability, parental resistance and variable interpretation by different local authorities. Several interviewees highlighted the lack of clarity within the guidance itself as a barrier to implementation (discussed later in more detail in this report).

Based on feedback from 22 local authorities, 9 thought that they had introduced EHE process changes since the statutory guidance had been introduced, be they major or incremental changes, whilst a further 2 reported that they were already in the process of implementing changes when the guidance was published. Conversely, 10 local authorities reported making no changes or very only minimal adjustments since the guidance was published. In 2 remaining cases, interviewees were newly appointed and unable to comment on whether any previous changes had been made.

4. Findings: determining suitability of education

4.1. Policy context

The guidance confirms that home-educated children are not required to follow the Curriculum for Wales. However, it outlines that a suitable education would include provision in numeracy, literacy and language skills, and be suitable to the child's age, ability, aptitude and be suitable to any ALN the child may have. A suitable education should also include socialisation and prepare the child for everyday modern life. Further information on aspects local authorities should consider when determining suitability are included within the guidance (sections 4.1 – 4.21).

The guidance outlines that local authorities should review the suitability of education being provided at least once a year. This aligns with their statutory duty to identify children who are not in receipt of an efficient education suitable to their age, ability, aptitude and any additional learning needs they may have.

The guidance advises that the frequency of meetings with home education families should be proportionate and based on the circumstances of each individual child.

The guidance sets out the expectation that a local authority should prepare a report no later than 10 days after meeting with a home-educating family, outlining if the provision is suitable or not, and provide reasons for the assessment made. In accordance with the guidance, local authorities are to provide an opportunity to discuss the report with parents so that any factual inaccuracies can be corrected quickly.

4.2. Approach to determining suitability of education

The majority of local authorities noted that they prefer to carry out annual in-person home visits to observe the learning environment, review resources and, where possible, talk to the child.

Most local authorities described how they conduct annual visits to assess suitability, with additional visits scheduled where concerns exist. Home visits enable observation of the learning environment, informal conversations with parents and children, and a review of resources such as textbooks and online learning platforms. Some local authorities highlighted the importance of being flexible, including adopting virtual visits or accepting written-only evidence, though authorities generally preferred face-to-face meetings. For such annual visits, most local authorities described the use of a report template to be completed upon completion of a visit.

Neutral, community venues such as libraries, parks, or community hubs are sometimes offered where families are reluctant to host officers at home. One local authority reported an increase in the number of visits being conducted (and children being sighted) when parents were given a choice to choose a venue – whether at home, a community venue, an organised event for EHE or a convenient, civic office.

Virtual visits were less commonly cited during the research but some local authorities have conducted virtual visits via Teams/Zoom, particularly since COVID-19, or where families refuse physical access. Home visits were always described as the preferred option. The virtual approach was generally seen as being less effective but was used pragmatically if families only agreed to engage this way or in situations where a virtual visit was deemed more suitable under the circumstances – for example, where a child has severe anxiety or mental health issues around meeting in person.

Some authorities preferred the term ‘activities’ rather than ‘evidence’ to avoid conflict with families who dislike being ‘tested’. Progress over time is a central criterion: authorities described how they look for improvement in literacy, numeracy, and other core competencies, and assess whether learning is appropriate to the child’s age and/or ability. Several respondents noted that parental use of artificial intelligence to generate reports is increasingly making it more difficult to judge the authenticity of the work. Some also mentioned how they feel slightly more suspicious if all evidence is very recent, i.e., clearly prepared just before a visit or request for samples.

Several local authorities described various templates or forms that are shared with parents in advance of any face-to-face meeting to provide evidence but noted that parents were under no obligation to use any specific templates and often would not do so. Where reporting templates were used, it helped ensure consistency internally for the local authority.

A recurring theme was the reliance on trusting parental accounts, particularly where families resist visits or only engage in writing. Officers from over half of local authorities acknowledged the difficulty of verifying whether parental reports accurately reflect the child’s learning experience. Some authorities emphasised relationship-building strategies, such as friendly initial phone calls rather than formal forms, to encourage cooperation.

Many local authorities emphasised the importance of speaking with the child directly to cross-check parental accounts and assess motivation to learn.

Discussions with children serve to verify parental accounts, provide insight into the learner’s interests, and allow officers to gauge motivation and understanding. For example, in visiting families at home, a child may read to the EHE officer or complete mathematics work while they are there, discuss a book they are reading, or explain a theme that they are currently learning about. In some instances, ‘doorstop visits’ were also made, with no expectation to be invited in, but it was seen as a good opportunity to speak with the child and get a feel for safeguarding issues. However, local authorities were fully aware that engagement is voluntary, as the law does not mandate a child’s participation, and it was noted that some families refuse access.

The ability of officers to make informed judgements about suitability was described as being closely linked to their professional expertise. Several respondents noted that being a qualified teacher enhanced the quality of assessment, as trained educators they felt that they were better able to evaluate progress and identify gaps. Others highlighted resource shortages, with only one officer responsible for hundreds of children, which constrained the depth of assessment that took place.

4.3. Evidence to determine suitability of education

Almost all responses indicated that local authorities considered literacy and numeracy to be essential benchmarks of suitability: “criteria such as literacy, numeracy and digital skills are fairly non-negotiable.” These are assessed either directly through evidence of work or indirectly through discussions with parents about the child’s learning. For older learners, authorities also look at qualifications, future aspirations, and whether the educational provision aligns with realistic career pathways.

However, some respondents outlined an issue with the statutory guidance as it stands, as it is difficult to assess whether the education is appropriate for the learner in question when EHE officers are so far removed from them to know whether it is at an appropriate level and approach for the child in question:

“There is a massive oversight in that the policy talks about appropriate education. It does not talk about teaching and learning. So you can have the best education provision, it can be gold standard, but if it is not delivered in a way that that child can learn it’s a moot point. But essentially what we’re being asked to do is look at the curriculum, not the learning… What might be appropriate for one learner wouldn’t be appropriate for another. So I think that there is an over reliance that local authorities must check that there’s an appropriate education without considering the learner at any point in the EHE guidance.”

Many local authority responses recognised that home education can take varied forms, ranging from structured curricula to child-led approaches such as Montessori. Suitability is therefore assessed against the child’s needs, abilities, and aspirations, rather than conformity with the curriculum for Wales. Parents are often asked to articulate their educational philosophy and aims, which are then used as reference points for follow-up assessments.

Many local authorities also explicitly considered opportunities for socialisation, physical activity, and wider life experiences as part of their assessment of suitability. While less consistently emphasised than literacy and numeracy, social engagement was viewed as contributing to a balanced and “broad” education.

Local authorities described how they draw on a wide range of evidence when assessing the suitability of home education. While the emphasis is often on samples of the child’s work, there are variations in how formal or structured this evidence is expected to be.

Some local authorities routinely request to see examples of written work, creative projects, or subject-based exercises. These local authorities reported that they ask to review workbooks, essays, art, or mathematics exercises. For example, in one local authority, officers will sometimes ask children to “read to them, complete mathematics work while they’re there, discuss books they’re reading or explain a theme they’re learning about.”

Other local authorities highlighted broader forms of evidence that are accepted as evidence including photographs, videos, diaries, or certificates from online schools. One local

authority emphasised that families are encouraged to “lead the presentation of evidence to avoid confrontation and encourage openness.”

Almost all local authorities accepted written reports, samples of work, photographs, videos, or progress logs as part of their suitability of education assessment. In a few local authorities, written reports were only accepted if a visit was declined.

Several authorities described how they often must accept or rely on written reports from parents. For example, one local authority said they “will accept written reports, although we don’t feel that by itself is sufficient as we can’t directly attribute everything to the child.”

One local authority, for instance, highlighted the importance of considering “whether it meets the child’s aspirations” and whether families have “enough resources i.e. textbooks” and a suitable learning environment.

The extent to which evidence can be directly attributed to the child is a recurring concern. Direct attribution to the child is strongest where visits and observations occur. Where evidence relies on parental reporting alone, confidence in attribution is lower. Several local authorities identified this as a challenge.

Several local authorities described how attribution is supported through face-to-face interactions such as asking children to read aloud or complete short exercises during visits. Officers at one local authority noted they can usually “judge if the child has completed the work themselves based on handwriting”.

A few local authorities raised specific concerns that when only photos or parental reports are provided, “there is no clarity that it is actual learner work being shown”. Another local authority also noted that without recent direct contact with the child, attribution remains uncertain. Similarly, it becomes difficult to directly attribute something to a child, or measure progress, unless the child was also seen a couple of years previously.

A few local authorities reported that while they may ask, they do not feel that the guidance, in the way it is currently written, allows them to insist on samples of children’s work. In practice, many families are willing to provide them voluntarily.

4.4. Frequency of assessments

Annual reviews are the standard expectation across most authorities in their attempts to determine the suitability of education for EHE children. However, with the growing numbers of EHE children across Wales, many local authorities described how this was becoming increasingly difficult to achieve - particularly when looking to arrange in-person visits:

“We have 400 children to assess and one member of staff so there are definitely resource issues here as in all local authorities”

Additional visits or requests for evidence may be triggered if there are concerns about suitability, safeguarding, or attendance of a child with ALN. In some local authorities, frequency increases in critical exam years (Year 10–11) or where little/no evidence is

provided at first contact. Many local authorities reported some form of prioritisation for the arranging of visits and requesting evidence. The main bases are

- safeguarding concerns - children known to social services or on child protection registers are reviewed more frequently and more thoroughly
- educational risk factors - children with no evidence of learning, minimal parental engagement, or reports raising doubts about literacy/numeracy are prioritised
- critical school years - learners in Years 10–11 (exam years) are often prioritised to ensure they are on track with qualifications
- structured prioritisation systems - several local authorities use RAG (Red-Amber-Green) rating systems to categorise families according to level of concern, with red cases monitored most closely.

Engagement with visits is mixed across Wales, with clear examples of both strong and limited cooperation. Several authorities reported that many families willingly share evidence and meet officers. For example, one local authority described that ‘some families are brilliant and will show what their children are working on,’ while another noted that parents often provided extensive samples, including online school certificates. In another example, it was emphasised that a family-led approach to presenting evidence helps maintain engagement. Some parents were reported as being grateful that EHE officers were qualified teachers that could offer detailed guidance – and were more willing to trust officers because of this.

One local authority noted that while face-to-face meetings are effective, “some families do not meet up with the EHE officer” and pointed that some families are ‘warned’ by EHE groups to never engage with the local authority or any form of authority. In such instances, some families will initially only engage via phone calls, but over time, can start to trust the EHE officers and agree to meet later in the process. Other families will completely fail to engage and often have a history of non-attendance and prosecution at school prior to electing for home education.

One local authority was struck at how nervous most EHE families were, when visits were being arranged:

“What struck me is they are incredibly anxious when you come – and I suppose when you only visit once a year, they are likely to be aren’t they? But incredibly anxious. I am confident that we do put them at ease and that they feel far more comfortable when we leave. We are always invited back. We can see that they will engage with us once we’ve got in.”

Another added that where evidence is weak, officers support families to improve rather than escalate immediately.

A minority of parents were described as resistant or refusing visits. One local authority reported that “some parents don’t want to engage,” while another noted that in these cases

written reports are accepted as an alternative. Another raised concerns that without seeing every child directly, the authenticity of written evidence cannot be assured.

4.5. How suitability of education is agreed

Across Welsh local authorities, there was considerable variation in how the suitability of education for EHE children is assessed and agreed. In most areas, decisions rest primarily with individual EHE officers or coordinators, though some authorities reported adopting, moving towards or considering panel-based approaches for more complex cases.

In a majority of local authorities, decisions on suitability are made by individual EHE officers or coordinators. These officers are often qualified teachers or education welfare staff, and they typically base their judgement on evidence provided by families, observations from visits, and conversations with children and parents.

For example, in one example, suitability is determined by “EHE officers, who are both experienced former teachers” with the option of consulting with specialist colleagues (e.g. ALN or disability services) if required. Similarly, another local authority reported that the EHE coordinator makes the decision alone, while in another, “the EHE officer makes the decision alone and bases it on any evidence given and the child's development against expectations.”

In some cases, there is regular discussion with managers or colleagues to provide additional oversight, even where the final decision rests with the EHE officer. For instance, one local authority noted that their EHE lead “has monthly meetings with her manager to discuss what she is and is not happy about” whilst another local authority emphasised that decisions are sometimes made collectively: “just today I went to discuss with a colleague and made a decision based on a collective opinion.”

Only some local authorities currently use, or are planning to use, a formal panel system to review suitability. One local authority reported that, while decisions are currently made by the officer alone, “from September, families where there are doubts regarding suitability will be assessed by the new EHE panel.” Similarly, another local authority explained that although suitability decisions are usually made by officers, “if we think we need to start [a] SAO process we will take this to the multi-department panel to discuss.” Another local authority also reported escalating “tricky cases” to a panel, while a further 2 local authorities are considering introducing panel arrangements specifically for SAO cases. This suggests that while panel-based oversight is not yet common practice, there is a growing recognition of its value in ensuring consistency and robustness, particularly for more complex or contested cases.

In just under a third of local authorities, decisions are subject to formal sign-off by a manager or team lead. Local authorities with such processes in place felt that it provided a second layer of professional judgement and helped reduce the risk of inconsistency or dispute. For example:

- in one local authority, suitability decisions are “signed off by the Team Manager” after review of officer reports

- another local authority requires the EHE officer's recommendation to be reviewed and signed off by the education welfare service lead
- one local authority noted that if EHE officers are "unsure, they'll come to me and we'll have a conversation and supervision" before initiating further steps
- in another example, it was explained that decisions are signed off by the EHE lead and, where there is uncertainty, by the interventions manager
- two local authorities both emphasised managerial oversight through discussions and case review.

4.6. Use of the statutory guidance in assessing suitability of education

Seven local authorities reported that the statutory guidance has provided greater clarity and consistency in assessing suitability. One local authority said the guidance was clearer than the previous version, particularly in setting out expectations around progress and providing a standardised framework across Wales. Another LA described the guidance as "really helpful" in clarifying processes for when a child comes off the school roll, and another said it had shaped a structured assessment framework. One LA noted that the flexibility it allowed in accepting creative outputs (such as photos or posters) alongside more formal work was valuable.

A few of these local authorities reported more substantive process changes attributable to the guidance, though in 2 cases these were described as standardising practice that was already largely aligned locally.

A further 8 local authorities reported that the guidance had made little or no difference to practice. In some cases this was because similar processes were already in place, while others said they continued to rely on local professional judgement rather than changing practice.

Ten local authorities highlighted limitations, describing the guidance as vague or contradictory. One local authority said it had not been particularly useful because the authority already had similar processes in place and had consequently drafted its own internal EHE guide. Another felt the guidance served mainly as a prompt rather than a tool which had prompted significant change. Other local authorities reported only a limited effect, noting that while the guidance formalised expectations, it had not changed practice. Two local authorities stressed that the ambiguity of the guidance sometimes enabled parents to resist engagement or to provide weak evidence. One local authority observed that some other jurisdictions have annual assessments, including basic tests that home-educated children are expected to complete but that there did not seem to be an appetite for this in Wales which, in their view, limits the ability to demonstrate progress.

Seven local authorities criticised the overall tone and wording, arguing that 'should' rather than 'must' has resulted in too many grey areas that weaken enforcement and safeguarding. One local authority pointed to contradictions between sections 4.11 to 4.13 and 4.16 to 4.17 which made pinning down a definition of 'good' education difficult and called for stronger and clearer wording. For example section 4.13 notes what local

authorities should not require of home education and 4.16 and 4.17 were deemed too vague in noting what they did require. It also noted that the guidance makes it clear at 4.34 that local authorities can make informal enquiries of parents for details of the educational provision for their child, but that there is a lack of clarity about the depth of questioning and analysis that constitutes an ‘informal’ enquiry.

Others observed that flexibility in interpretation has produced wide variation in practice between local authorities and may not reflect the changing profile of the EHE cohort, many of whom have been withdrawn from school for negative reasons and whose parents feel unsupported or unprepared. In such instances, parents were described as often being “incredibly anxious” and struggling to know what to do in terms of providing suitable education for their child. These local authorities highlighted the importance of making these parents feel at ease from the outset. Initial and early contact by phone (within 10 days of deregistration) was seen as a more “friendly” approach to build a positive relationship from the outset, than sending a form. Where families continued to struggle, one local authority mentioned how they offered quarterly meetings to support improvement.

Four local authorities described practical difficulties in judging progress and attributing evidence to the child without a statutory assessment framework. The ongoing evidence-gathering process was described by one officer as “tricky and resource heavy” because it depends on parental cooperation.

Responses to the guidance’s Annex A’s suggested characteristics of suitable education were mixed. One local authority said that progress forms based on these characteristics were useful for families, while another regarded literacy and numeracy indicators as helpful touchpoints. Others argued that these indicators were not strong enough to define suitability in practice, and others felt the Annex largely reinforced processes they already had in place.

A few of local authorities said that although the guidance was helpful, it lacked the “ammunition” to compel change when education was unsuitable and required adaptation to local practice to be workable.

Local authorities suggested improvements including clearer definitions and standards with practical exemplars, more parent-facing materials and templates, stronger guidance on evidence attribution (for example how to demonstrate that work is child-produced), more guidance for families of children with ALN and clearer signposting between educational monitoring and safeguarding.

Overall, while the guidance has provided useful prompts and structure for some local authorities, for others its ambiguity and limited enforceability have constrained its operational impact, with outcomes depending heavily on local capacity, existing procedures and the extent to which each authority has translated the guidance into local tools and processes.

5. Findings: arrangements made to see the child

5.1. Policy context

The EHE statutory guidance emphasises the importance of seeing and speaking with a home-educated child to determine suitability of education. This was a new addition to the revised guidance, in response to the [Children's Commissioner's review](#) (2021) of the Welsh Government's exercise of its functions in relation to EHE and independent schools, and was intended to support local authorities to undertake their existing statutory duties.

In section 4.21 to 4.26 of the guidance it states that in order to determine suitability the local authority 'should see and communicate with the child', although this is not mandatory. However, whilst parents do not have to agree to a meeting, the guidance states that ultimately it will be difficult for the local authority to determine suitability of education without seeing or speaking to the child. Such meetings do not have to take place in the home and can take place in a mutually agreed location.

If a meeting does not take place, the guidance states that a local authority must decide whether it can be satisfied that the child is receiving a suitable education based on the material evidence the parent has provided. The guidance notes that in certain circumstances it may not be in the best interest of the child for the local authority to meet with them, and in such circumstances, the local authority can conclude without seeing and communicating with the child that they are receiving a suitable education.

5.2. Arrangements in place to see the child

Local authorities described a range of arrangements to enable them to see EHE children, with most acknowledging that engagement relies heavily on building trust with families. While statutory powers remain limited, staff emphasised that "soft" approaches, flexible meeting options, and persistence are fundamental to creating opportunities to see children.

Most authorities reported that their standard expectation is to see the child as part of an annual review, ideally in the home environment. However, recognising that some families are reluctant to allow home visits, alternatives are routinely offered. Meetings were reported to take place in council offices, cafés, libraries, community centres, or even outdoor spaces such as local parks. As one officer explained: "If the family doesn't want us in the home, that's fine – we'll meet wherever they're comfortable. The important thing is that we see the child and get a sense of their progress."

Several authorities also use enrichment or community activities to increase opportunities for seeing children in less formal, social settings. Examples included group learning sessions in local venues, resource distribution events, coffee mornings, and drop-in workshops. One officer noted that: "Sometimes parents who are hesitant about home visits will happily bring their child to a science session or a craft workshop. That way we can interact with them in a natural way."

More direct approaches were also reported. Doorstep visits were mentioned as a pragmatic strategy where families did not permit home entry. One local authority explained that this was not ideal but at least provided “a way of having some contact - we can see the child, even if just briefly, and check they’re okay.” Another described allowing parents to keep children in the background during meetings, even if they did not want them to engage directly: “If we can at least see the child in the room or in the garden, it reassures us they’re there and that’s often the first step towards building trust.”

Local authorities also highlighted staged approaches to correspondence and follow-up. Letters, phone calls, and text reminders were described as standard, often followed by joint visits with other professionals already working with the family. Traveller education coordinators, social workers, or health visitors were cited as important partners in reaching families who may be harder to engage. As one officer explained: “We don’t give up after one letter. We keep trying, and sometimes another professional who knows the family can open the door for us.”

Finally, many local authorities emphasised that safeguarding is the backdrop to these arrangements. Staff receive training, attend multi-agency forums, and have agreed escalation routes into social services where engagement is not forthcoming. One officer summarised: “We’re not there to police home education, but we have a duty to check children are safe. If we can’t see them at all, that’s when it becomes a safeguarding concern.”

5.3. Difference in ability to see the child since statutory guidance introduced

Local authorities gave a mixed picture of whether the statutory guidance had improved their ability to see EHE children. Overall, while a small number of authorities could point to incremental increases in children being seen, the majority said that the statutory guidance itself has not been the primary driver and that it had not resulted in substantive change.

Some authorities reported a modest rise in the number of children they are now able to see. These gains were typically described as “slight” rather than transformative, with increases of “a handful” of learners rather than large jumps. One local authority estimated that they were now able to see “around 10% more of our cohort” compared with before the guidance, though stressed that this was primarily due to changes in staffing and practice. Another suggested they had managed to bring in “a few extra families each year” but added: “It’s not dramatic - the guidance alone hasn’t shifted the dial.”

Where improvements were observed, the biggest drivers cited were not the guidance itself but local-level factors. These included:

- increased staffing capacity (e.g. employing dedicated EHE officers or administrative staff to maintain registers and follow up promptly)
- new processes, such as scheduling visits earlier after deregistration, or making persistent contact attempts through multiple channels (letters, calls, texts)

- relationship-building approaches, including drop-in events, activity sessions, and group workshops that created more informal opportunities to meet children
- post-pandemic flexibility, with some families now more open to video calls or alternative meeting arrangements.

As one local authority described: “The increase we’ve seen is down to how we’re working differently - more proactive, more creative. The guidance didn’t give us the tools; we had to build them ourselves.”

In contrast, some other authorities reported that the number of children they are able to see has either stayed the same or, in some cases, declined. Staff highlighted persistent challenges including:

- parental resistance, with families becoming more confident in refusing contact, sometimes quoting the guidance itself: “Parents will say, ‘Show us where it says we have to let you in.’ And of course, we can’t - so we hit a brick wall.”
- a lack of legal powers, with officers emphasising that, despite the guidance, they cannot compel a child to be seen which leaves them reliant on voluntary cooperation
- growth in the EHE population and the rising numbers of EHE children making it harder to sustain one-to-one visits with limited staffing: “Even if we’re getting round the same proportion, the actual number we’re missing is higher because the cohort has grown so much.”
- the influence of advocacy groups - with some local authorities in particular describing instances where a few parents actively cite advice from campaign organisations in order to decline visits.

5.4. Views on whether guidance goes far enough in affording local authorities the powers to see the child, and other key areas

There was near-universal agreement that the statutory guidance does not go far enough in equipping local authorities with the powers they need. Local authorities consistently stressed that, while the guidance encourages them to see children, it does not create a statutory requirement for families to comply.

The main gap identified was the absence of legal compulsion. One local authority felt this undermined their authority to do so: “We can ask, but if the family says no, that’s the end of the conversation. There’s no legal lever to pull.” Several local authorities stressed that the only meaningful way forward would be legislative change to require children to be seen at least annually.

Beyond this, local authorities highlighted specific gaps and areas where the guidance could be strengthened or clarified. Several local authorities felt that there needed to be clearer expectations around parental obligations, describing the guidance currently as “too woolly” on what families must do. One explained: “It needs to spell out what’s expected of parents, otherwise they interpret it however they want.” A few suggested that parents should be

required to provide evidence of educational plans or samples of work at the point of deregistration. Other local authorities called for clearer deadlines for when children must be seen after deregistration, rather than leaving this vague.

A number of local authorities said the guidance should be backed by a legal requirement for an EHE register, ensuring all children are accounted for. Some wanted the guidance to more clearly separate educational monitoring from safeguarding duties, to avoid confusing families and professionals alike. They also raised issues with the definition of 'seeing the child' and noted that the guidance does not specify what counts as seeing a child - e.g. whether video calls, group events, or brief encounters are acceptable. This, they argued, creates inconsistency across local authorities' approaches.

Local authorities also pointed to the ambiguous language of the guidance, which they felt created loopholes. Terms like 'should' rather than 'must' were viewed as diluting its force. As one put it: "Parents pick up on the word 'should' straight away - it tells them it's optional."

Overall, while some valued the guidance as a statement of intent, the overwhelming view was that it is not sufficient to guarantee access to children. Local authorities wanted clearer, firmer wording, explicit parental responsibilities, and ideally a statutory underpinning that would remove ambiguity. One local authority summed up the dominant perspective: "Until it's law, we'll always be asking, not requiring. That's the gap."

6. Findings: school attendance orders (SAO)

6.1. Policy context

The school attendance order (SAO) process is outlined in section 5 of the guidance. The section includes an overview of the legislation, and when local authorities should refer to the SAO process. Further detail on the SAO procedure itself is set out in the [All Wales Attendance Framework](#).

The guidance sets out the following expectations on local authorities, where it appears that a child of compulsory school age is not receiving a suitable education: the local authority must serve a notice in writing to the parent to satisfy them within a specified period that the child is receiving such education. If the parent fails to do this, and the local authority considers it expedient for the child to attend school, they must issue the parent with a SAO which details the school the child should attend.

Furthermore, the guidance states that if a parent fails to comply with an SAO, the local authority must then consider whether it is appropriate to apply for an education supervision order (ESO) in respect of the child. Where the lack of suitable education appears likely to impair a child's development, then, in accordance with the guidance, the local authority is expected to fully exercise their safeguarding powers and duties to protect a child's wellbeing and ensure they are protected from significant harm.

6.2. The SAO process

Before starting a formal SAO process, most local authorities described how they usually try to work closely with EHE families to improve the suitability of the education and/or the evidence of suitability provided. Examples provided by respondents of the type of support offered at this point include holding quarterly meetings with the family to support improvement; sharing techniques and resources; providing advice on how to evidence suitability; referring the families to wider support networks; providing specific literacy and numeracy support; and developing an action plan for improving the suitability of education. Local authorities explained that the support provided may also be collaborative and multidisciplinary when the family receives support from wider departments and agencies (such as social care or youth offending teams). There was a clear preference amongst local authorities to proactively engage with families in this manner as a first course of action, using the formal SAO process as a last resort. However, respondents noted that this approach only applies when EHE families are willing to engage with local authority EHE officers to some extent and not when there is complete refusal to engage.

If, after this support, the local authority does not deem the education suitable, most local authority EHE officers described how they usually inform parents in an informal and approachable manner such as in-person or over the phone. During our interviews, they explained that the intention is to provide families with a final opportunity to improve the suitability of education and/or the evidence provided and discuss the option of the child returning to school. Again, this is only possible where the families have engaged with the

local authority to some extent. For example, one local authority noted that in around 9 out of 10 cases, the family will agree that the child can return to school at this point.

The process for formal action, where required, was generally consistently described across all interviewed local authorities: it involves a step-by-step escalation process (sometimes supported by a flow chart), providing families with opportunities to respond. It is at this point that local authorities' legal teams become involved and, in some cases, overall responsibility passes to the wider Education Welfare Service (EWS) or an EHE multidisciplinary panel.

Most local authorities explained that the process typically involves sending 3 letters to families in line with the guidance. The first letter outlines the local authority's concerns and requests improvements within a set timeframe (such as 15 days). The second letter gives further warning that an SAO process may be initiated and names a school the child could attend. The third letter gives formal notice that an SAO is being initiated.

“Currently if we feel that the education isn't suitable, there'll be a conversation with a parent. And if the parents engage, usually they'll get together more evidence or examples of learning or they provide an additional report and then that's reassessed. In most cases, that's what happens, and then the education is deemed suitable. [But] if the parent disengages or won't answer our telephone calls or acknowledge our home visit letters or announced calls to the home, that would initiate our first letter, which would be the Section 437 with the intent [to issue an SAO]. And then if they don't engage with that, they're given 15 days to respond. If no response is received within 15 days a second letter goes out. If no response is received after that, a third letter will go out and the parent will be summoned to court.”

In many cases, local authorities find that the initial steps in the formal process are sufficient to encourage improvement in the suitability of education. This may include an improvement in the suitability of the education provided, an improvement in the quality of evidence provided or a return to school. Alternatively, families may not respond until later in the process (for example, after the issuing of a third letter) but their response may be sufficient to halt the SAO process.

“Some of the time, the families themselves will admit “we've made the wrong decision. It isn't working for us. It's a lot more responsibility that we took on than we actually realised.” So sometimes they're completely on board with it. Other times, if it is blatantly, really clear that there is insufficient home education being provided, I'll be very firm but fair.”

A small minority of local authorities also explained that alternative processes may be used instead of, or in addition to, SAOs. For example, a child may be taken into foster care and/or move to live with an alternative family member able to provide a suitable education. One local authority specified that, due to amount of time it can take for an SAO to reach court, they refer families to the social care team alongside the SAO initiation so team members can investigate any welfare concerns related to a lack of suitable education in the meantime. Another local authority also noted that, in some cases, they were able to resolve matters through open child protection cases rather than formal SAO processes.

6.3. SAOs issued

Roughly two-thirds of local authorities reported having issued SAO notices in the past 3 years, although most of these local authorities have issued a very small number (and occasionally only one). There is no clear geographic trend amongst local authorities who have issued at least one SAO notice compared to those which have not.

Amongst local authorities who had issued at least one SAO, by far the most common reason was an almost complete lack of engagement from EHE families. In such cases, the local authority had received no evidence from families, had received no response to their outreach attempts and/or had been met with refusal to speak or meet with local authority representatives.

“Most [SAOs] are not because of lack of suitable and efficient education. It’s more that we’ve failed to make contact with them, so we refer them on at that point.”

A small minority of local authorities had issued SAOs because the education had not been deemed as suitable, based on the evidence provided by parents, and showed no sign of improvement despite local authority support.

Amongst those who had not issued any SAOs, the most cited reason was the effectiveness of the initial constructive engagement and support provided to families. Families who had not engaged with the local authority at all typically responded to warning letters before it was necessary to issue the SAO. As such, local authorities reported that issuing SAOs was not the first nor the most suitable course of action in many cases.

“I think the number of cases [in our local authority] where SAO might be appropriate are very, very, very small.”

Overall, the views of local authorities on the effectiveness and value of issued SAOs were mixed. One local authority found that issuing SAOs did improve EHE family engagement and prompt them to share required information. Another was keen to see the system strengthened to allow authorities to intervene more effectively where there are additional safeguarding concerns and for statutory checks to be required before deregistration is permitted. Others, however, felt that constructive engagement with families was more likely to lead to improved educational outcomes for the child. Another had mixed experiences of the effectiveness of court decisions in supporting local authority concerns.

“If what we are after is children being educated and happy, [my belief is that] issuing an SAO makes no difference.”

“Is [an SAO] going to affect a change? Or is it going to affect no change and further breakdown every relationship that's in place. So I think it's about understanding the position for that family, for that child. If someone's got a complete lack of provision of education for their child or it's nearly at that point, there's generally other things going on, other agencies involved, so it becomes part of a larger discussion and the improvement for that child or that family as a whole is taken forward through other processes.” (Local authority)

A minority of local authorities reported structural challenges related to issuing SAOs. These included:

- a lack of capacity in the local authority EHE team or the legal team to issue SAOs, with the process being described as lengthy and resource-intensive
- the length of time it takes for SAOs to reach court
- finding spaces for children in schools, particularly in oversubscribed areas
- legal uncertainty and the fear of becoming a test case.

“We could be stronger on School Attendance Orders; we're not moving fast enough on that [because of capacity challenges].”

A couple of local authorities indicated that the new statutory guidance had formalised and clarified their SAO processes and provided a level of confidence to start the formal process. Another clarified that they had referred to the statutory guidance but did not feel their existing processes required significant changes as a result.

“We have asked for SAOs before but now these processes have happened because of the guidance...so certainly the guidance has helped SAOs...Because we know what we're looking for in suitable provision and then you've got the process - letter one, no response, so you send letter two, nothing, then you sent letter three saying that we don't receive anything we'll start the SAO process...the [SAO] processes are more concrete, they are there to support us as local authorities.”

“We don't want the legal challenge. We try to make sure everything aligns with what Welsh Government provides.”

6.4. Use of non-statutory supplementary materials

A majority of local authorities reported using the non-statutory supplementary materials provided alongside the statutory guidance. Most of these local authorities had amended the materials to meet their own internal style requirements, EHE context and approaches to engaging with EHE families. Local authorities reported amending reporting and letter templates to make them more user-friendly, for example ensuring the voice of the child is represented or making the language more approachable.

Those local authorities who stated that they do not use the supplementary materials did, in most cases, report that they reviewed the materials to ensure their existing documentation aligned with the most essential elements. These local authorities preferred the style and format of their own templates but recognised the value of having the non-statutory supplementary materials as a reference point.

“I would say that what we have got is a bit more user-friendly...we've covered all of the aspects of it, but we've made it look better.”

A few local authorities reported that they do not generally seek to use the initial template forms for families. They noted that they prefer to engage with the families over the phone or

face-to-face initially to build a positive relationship and work with the families to develop their EHE plans.

“Trying to build the relationship up rather than sending a very formal letter out to them straight away. And we just felt [that] for our community, that that would get a lot of parents' backs up. So, for us, it works better with that phone call.”

On the other hand, a few local authorities also reported that the current non-statutory nature of the family forms limits compliance in some cases. These local authorities believed that making it a statutory obligation for families to complete the forms would support local authorities to exercise their duties effectively.

While local authorities did not identify any necessary additional materials, a couple emphasised that local authorities should be more effectively involved in the design of materials to make them as user-friendly as possible.

7. Findings: support for EHE families

7.1. Policy context

Section 6 of the statutory guidance outlines how local authorities can support home-educating families. Local authorities are encouraged in the guidance to support home-educating families by providing general advice and facilitating access to discounted rates for educational materials, informing families about projects or programmes available to home-educated children and offering access to community and sports facilities on the same basis as school children.

Local authorities are encouraged in the guidance to offer practical assistance, such as access to counselling, educational resources, and examination centres, to help families provide a suitable education. Home-educated children should also have access to youth support services and Careers Wales services. Local authority officers can share information with such services, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA 2018) and should consider sharing information wherever it is legal to do so.

The guidance states that parents of EHE children are responsible for examination costs, but local authorities are expected to provide access to Welsh Joint Education Committee (WJEC) examinations at identified centres for external candidates.

The statutory guidance emphasises the importance of supporting families who choose EHE, particularly those with children who have Additional Learning Needs (ALN). The guidance sets an expectation on local authorities to work collaboratively with families to identify and secure the appropriate additional learning provision (ALP), as outlined in the child's Individual Development Plan (IDP). The local authority must also regularly review the IDP at least annually to ensure that the ALP is being delivered effectively and meeting the needs of the child.

The guidance notes that local authorities should ensure that home-educated children with ALN receive tailored support to meet their needs, and they must actively review and monitor the delivery of ALN provisions.

7.1.1. Additional funding made available for local authorities

Additional funding made available by Welsh Government to local authorities (outlined in section 3.1.1 above) is intended both to strengthen officer capacity and to provide direct support to families who choose to home educate. The funding is provided to enhance staffing so that local authorities are better able to meet their statutory duties in relation to home-educated children. The funding also recognises that families incur costs when providing educational resources and opportunities that are otherwise freely accessible in schools. Local authorities therefore have flexibility to use this funding to help meet a wide range of needs, which may include support with qualifications, Welsh language learning,

resources and materials, digital learning tools, facility hire for group activities, and enrichment opportunities such as outdoor education or music.

The funding terms and conditions stipulate that it is not intended to replace the responsibility of parents to provide their child's education, nor should it be used for purposes unrelated to learning. The terms and conditions of the additional funding makes clear that the money should not be used for direct payments to families.

7.2. Extent that guidance has provided clarity

There was a divide between the local authorities with about half (10) reporting that the guidance had provided better clarity on support to be offered to EHE families, and about half (9) stating that it had made little to no difference.

Those who reported greater clarity explained that the guidance outlines the responsibilities of local authorities which clarifies the support to be offered to families. In setting out baseline requirements it creates transparency that is useful for parents as well as the local authority. For example, what financial claims can be made by families. It was noted that whilst providing clarity on the responsibility to support Welsh medium learning, some local authorities struggled to meet this due to a lack of providers and other resources in their areas.

The main reason for stating the guidance has not improved clarity was that the local authorities were already delivering everything before, and no new content was added. For some this was an example of bringing together best practice but for others this limited the guidance's usefulness. They expressed a desire for stronger guidance with more operational details.

For a minority the guidance has provided suggestions for ways to support. In one example the guidance coincided with new staff in posts so the guidance has been used extensively to help redesign systems in the local authority.

7.3. How has additional funding been used

The interviews showed that additional Welsh Government funding for EHE families is used in various ways across local authorities. A central feature is the direct learner grant. Many authorities distribute funds directly to families, often on an annual basis (commonly £100 to £250 per learner). Families usually apply for this support and indicate how they intended to spend it, with flexibility to use it for exams, laptops or books at their own discretion.

Another important reported use of the funding was exam and tuition support. Local authorities often contribute towards GCSE and other exam fees, and in some cases support tuition or academic courses. Group tuition in English, Maths, Science and other subjects is arranged in community settings, by parents or sometimes by the EHE community itself and paid for by the local authority. It was reported that this provision has been particularly valued by families with older learners preparing for formal qualifications.

Funding has also been widely used for educational resources. Local authorities reported providing items such as stationery packs, journals, age-appropriate resource bags, Twinkl subscriptions, and book vouchers (for example £40 per learner). These resources support day-to-day learning at home and are often tailored to the learner's stage and needs.

A further focus was on extracurricular and enrichment activities. Families have benefitted from leisure and cultural opportunities including swimming lessons, gym passes, forest school sessions, outdoor learning centres such as Nant BH and Pentre Outdoor Education Centres, as well as passes for zoos, Cadw, the National Trust, and theatre or cinema visits. Authorities also use the grant to fund arts, photography, drama and wellbeing sessions. Social events such as coffee mornings are another feature, helping to bring families together, encourage peer support, and reduce isolation.

In some areas, digital access is prioritised. Funding has provided Chromebooks or other IT equipment for learners who needed it, while others have been encouraged to make use of hubs and libraries to access online learning platforms.

There is also targeted provision for Welsh language support, with some authorities offering workshops and courses to help families and learners engage with Welsh as a second language.

Across all, wellbeing and socialisation are emphasised. Local authorities reported creating opportunities for children to mix with peers and for families to connect, sometimes in partnership with local services such as the fire service, police, or botanical gardens. These activities were described by local authorities as filling gaps in EHE left by school-based provision and offering safe, supportive environments for learners.

Some local authorities underlined the importance of flexibility. While some families value signposting to community resources, others prefer independence in how they used the grant. Surveys were sometimes used to gather parental feedback on funding priorities, making provision responsive to families' needs.

7.4. Activities arranged for EHE families

Respondents described a range of activities arranged to build positive relationships with EHE families. These generally aim to reduce isolation, encourage engagement, and create opportunities for staff to meet families in supportive contexts.

Leisure and sporting opportunities are widely used. Free swimming lessons are particularly popular and encourage attendance from families who otherwise avoid direct contact. Other authorities arrange rugby, sports days, leisure passes and gym access. Outdoor learning is another valued approach, with forest schools, beach schools, and farm visits seen as effective ways of engaging children.

Creative and cultural opportunities are also common. These include arts and crafts, photography, science projects, cookery, drama, circus skills, and author visits. Other examples include IT and exhibitions and music sessions or archery.

Social and community-based activities such as coffee mornings and drop-in sessions were described as providing relaxed settings for families to meet officers. Authorities reported that these informal approaches help to break down barriers more effectively than home visits.

The impact of such activities was generally positive. Children often attended events even when parents declined visits, providing informal opportunities for staff to see them and reducing concerns about isolation and safeguarding. Targeted activities were also reported to help improve engagement with specific communities, such as Gypsy, Roma and Traveller communities. Trust was often strengthened when families encountered local authority staff in informal or community settings.

Challenges remain, including inconsistent attendance by EHE families to local authority arranged sessions making it difficult to build rapport and relationships, limited funding, and resistance from some families. However, activity-based and inclusive approaches, often provided in partnership with local services such as the fire service, libraries, and youth clubs, were regarded as the most effective.

7.5. Requests for ALN support

Local authorities stated that many EHE parents had requested assessments for ALN. These requests were common across local authorities areas and covered a wide range of needs, particularly autism, attention deficit hyperactivity disorder (ADHD), social communication difficulties, anxiety and emotionally-based school avoidance.

Local authorities generally follow the same procedures as for schooled pupils, often involving PCP meetings, ALN panels, or direct referrals to ALN teams and other services such as Child and Adolescent Mental Health Services (CAMHS) or educational psychology. In one area EHE officers are qualified to carry out IDP reviews themselves, while other areas collaborate closely with ALN officers through regular joint meetings or shared casework.

Several authorities noted that some parents withdrew children from school partly because ALN needs were unmet or not addressed quickly enough, with EHE sometimes perceived as a way of accelerating access to ALN decisions or specialist placements. While this may have provided families with quicker access to support as “EHE families do not have to provide the same evidence as schools do and effectively get an immediate assessment – their aim is to secure a specialist school location for their child”, it also placed additional strain on ALN services.

Authorities described both benefits and challenges arising from these requests. In some cases, ALN assessments and IDPs created opportunities for learners to re-engage with education, access tailored courses, or begin to consider career pathways. Positive relationships were strengthened when families felt their concerns were validated. However, there was also concern that IDPs for EHE learners were not always effectively monitored or implemented, raising questions about their impact. Limited resources and high demand created additional pressures, and some authorities stressed the need for clearer national guidance to resolve inconsistencies between EHE and ALN legislation.

7.6. Additional Learning Provision

Fieldwork with local authorities suggests that the way appropriate ALP is arranged for EHE learners differs widely but usually involves close collaboration with ALN teams. In many cases, parents provide most or all of the provision themselves, with the authority stepping in only when more specialist input is required.

A number of authorities explained that ALP is identified through the IDP process, often managed by ALN panels or PCP meetings. Where ALN needs are identified, educational psychologists carry out assessments and make recommendations which are then considered by LA panels to decide the most appropriate ALP. The ALN teams typically lead this process with input from the EHE team. These mechanisms ensure oversight, although the responsibility usually rests with parents once a child becomes home-educated.

Where parents cannot provide adequate ALP, local authorities may suggest Education Other than at School (EOTAS) rather than EHE. Other possible ALP provision was described as being delivered through Pupil Referral Units (PRUs), Autistic Spectrum Disorder (ASD) units, phobic units, emotional behaviour units, home tuition and support from CAMHS. A few described additional services made directly available to home educating families including tailored speech and language therapy that parents could not provide themselves, the use of personal assistants or home-based provision, and a dedicated nurse made available to EHE pupils.

A few local authorities described a more structured or formalised process. In one, educational psychologists provide ALN decisions to inform panel decisions on suitable placements. In another area, a dedicated EHE panel has been established to review requests for ALP, reflecting growing demand and the need for consistent oversight.

Authorities agreed that clear processes and strong collaboration across teams are essential, but also recognised that provision is uneven and, in some cases, limited.

7.7. Access to counselling

Local authorities described mixed experiences of EHE families requesting access to counselling services. In a minority of areas, parents had not made such requests or uptake was very low. In most other local authorities, referrals to community or school-based counselling were made when needs were identified.

There are a variety of routes into counselling. EHE pupils can be eligible for universal school-based counselling, even if not enrolled in a school. Families have sometimes been referred to community or voluntary sector services, including Barnardo's, Sandy Bear, Conwy Mind, and CAMHS. Some areas enable direct self-referral through community counselling schemes. Others rely on GP referral as the main pathway.

One local authority had developed targeted arrangements, providing designated EHE counsellors, and also worked with public health teams to offer information on wider wellbeing topics. Another had established a dedicated counselling stream for EHE children and linked this closely with their emotional wellbeing team, ensuring consistent oversight.

Evidence of impact was mixed. A few authorities reported positive outcomes, identifying children who had benefitted from regular sessions or who were supported to manage grief and emotional difficulties. However, most reported that outcomes were not systematically monitored and were only heard about indirectly, often during annual reviews or through panel discussions.

7.8. Access to youth support

Local authorities reported that there was broad access to youth support for EHE learners, although the extent of tailoring, proactive outreach and follow-up differed. Most local authority areas signposted EHE families to universal youth provision whilst some built bespoke routes to reduce isolation, support wellbeing and plan post-16 transitions.

Several authorities stated that they offer dedicated or adapted activities for EHE learners. One arranged EHE-specific youth groups and transport to widen access. Another set up bespoke projects such as Thrive and Seren and promoted daytime youth sheds for learners anxious about busy settings. One highlighted digital mentoring, Discord groups, Free2Bee clubs for anxious learners, one-to-one mentoring and transition guidance. Another referred Year 11 learners to the lechyd Da post-16 service, providing wellbeing and health alongside gentle engagement such as supported walks. One used wellbeing support groups, and lesbian, gay, bisexual, transgender, queer or questioning (LGBTQ+) signposting, coordinating with Inspire and Youth Offending Services.

Most other areas made systematic use of universal services and local partnerships. One referred to youth justice, emotional health, 16+ advice, homelessness teams and Careers Wales under a consistent offer. Others described regular liaison with youth leaders or progression teams and routine sharing of post-16 opportunities. Another passed Year 11 learners at risk of becoming not in education, employment or training (NEET) to the post-16 team and discussed college support for those with IDPs. Others used newsletters to keep EHE families informed, with direct contacts from school nursing teams where relevant. One emailed every family about universal services but noted uncertainty about take-up. Another offered open access youth support, targeted transition activities, and gradual introductions for anxious learners. One described how coordinated calendars of activities were arranged with the head of youth services.

Some limitations persisted. One reported limited demand from EHE families. Another flagged outreach capacity constraints and the need to protect EHE learners from becoming NEET.

7.9. Career services support

Almost all local authorities consistently identified Careers Wales as the main pathway for post-16 planning for EHE learners, particularly in Years 10 and 11, although practice was shaped by consent rules and variable feedback loops.

Local authorities used multiple channels to make families aware of careers support. These included newsletters, education packs and direct emails, often timed around Year 11

transitions. Many teams maintained regular contact with local Careers Wales advisers or held termly meetings to review learners without destinations. Where consent was provided, details were shared to enable direct follow-up; otherwise, families were asked to self-refer.

In several areas, Year 11 learners were guaranteed or routinely offered an appointment with Careers Wales. Targeted support for those at risk of becoming NEET was provided through linked projects such as Inspire to Achieve, Progress and Youth Engagement Services. One area described enhanced college transition arrangements for home-educated learners, including staggered starts and early assessment of social readiness. Another noted a dedicated EHE officer based in the Careers Wales office. Others monitored destinations to ensure lack of engagement was an informed choice rather than a gap in support.

However, data-sharing constraints were raised by local authorities as a common challenge. Several authorities could not pass details without explicit consent, limiting outcome tracking and systematic follow-up. Service quality was also uneven in places; one reported poor responsiveness from a dedicated contact and expected improvement since the appointment of a new adviser, while another asked for more active outreach than standardised letters.

7.10. Support with examinations

Most local authorities recognised the importance of exams, particularly GCSEs, but approaches differed in terms of funding, centres, exam boards and access arrangements.

Several authorities had established dedicated examination centres. Examples included the use of PRUs or specialist bases. One area benefited from a cooperative secondary school that hosted exams without charging EHE pupils to attend beyond administration fees such as exam registration. In other cases, local colleges were used, or new partnerships were being developed, with one confirming a host centre from 2025. Where local provision was not possible, families were directed to private schools or centres, sometimes outside the county.

Funding arrangements showed the greatest variation. One reported offering families up to £600 per learner for exam fees. Another covered entrance fees but parents paid for exams themselves. Some areas contributed partially, for example £250 per learner, while others relied entirely on parental funding. Others charged parents entry fees but ensured not-for-profit rates. One authority, facing high numbers in the current cohort, for the first time informed families it could not fund exams, although it continued to provide venues, invigilation, access arrangements and specialist assessments.

Access to exam boards and subjects was uneven. Whilst some local authorities restricted provision to WJEC Maths and English, others also included Science or a wider range across multiple exam boards such as Pearson, Edexcel and IGCSEs. Local authorities emphasised flexibility where possible, though practical constraints often limited breadth.

Support for learners requiring access arrangements was in place in many authorities. Examples included provision of scribes, extra time and home invigilation where needed. Others offered tours of exam rooms and pre-exam meetings to reduce anxiety. One local authority had trained EHE staff as exam invigilators to provide continuity and reassurance.

7.11. Queries from home education groups

Local authorities reported a wide variation in the extent and nature of queries from EHE groups about statutory guidance. In some areas, engagement was minimal or non-existent, with few or no formal queries received. Others described significant volumes of correspondence, often characterised by a legalistic or confrontational tone.

The most common form of contact was through lengthy emails or Freedom of Information (FOI) requests, sometimes sent anonymously or as part of coordinated campaigns. Authorities explained that these communications could be time-consuming, repetitive, or adversarial in nature.

Many authorities emphasised the negative impact of these interactions on staff wellbeing and capacity. Officers in one area reported that the tone and timing of queries had a direct effect on their morale, particularly when demands arrived at the end of term. Another highlighted that organised groups are articulate, well-resourced, and influential in encouraging families to disengage from local authority support. Several authorities stressed that responding to collective campaigns often produced little benefit and diverted time from working directly with families.

At the same time, there was acknowledgement that many individual families remained constructive and willing to engage. Some authorities noted that families had distanced themselves from EHE groups, feeling that they no longer represented their interests. One cautioned against assuming that the loudest group voices reflected the majority of families, stressing that many were content to cooperate with the local authority.

8. Conclusions

The guidance has achieved some benefits in supporting local authorities to carry out their duties in relation to EHE. Several local authorities reported greater clarity and having a standardised framework in place and highlighted its helpfulness in clarifying SAO processes and improving suitability of education assessment templates.

However this is uneven - around a third of authorities reported that the statutory guidance has made little or no practical difference to their approach either because their existing processes already aligned with the guidance or because the guidance is seen as too vague to change practice. Overall, the guidance has clarified intent but has not consistently changed local authority practice or strengthened enforcement levers. The additional funding provided by the Welsh Government has increased local authority capacity in many cases, and there is a stated desire for the funding arrangement to be agreed for the long-term.

Only 9 local authorities stated that they had introduced substantive or incremental process changes since May 2023 in response to the statutory guidance. Examples included revising local policies, adopting Welsh Government templates, establishing new referral processes or EHE panels, and strengthening multi-agency working. However, around 10 local authorities reported some issues around the limitations of the guidance, citing concerns about ambiguity or perceived contradictions. It was also noted that the guidance's reliance on voluntary cooperation from families to meet with EHE officers limits the effective monitoring of, and support for, all home-educated children.

Overall, the evidence does not show that the statutory guidance is being used fully and effectively by all local authorities. While the guidance provides a useful framework and has prompted substantive changes in some areas, its practical application is uneven as it is highly dependent on local resources, interpretation, and the extent to which authorities have embedded the guidance into concrete local processes.

When considering the extent to which the statutory guidance has been effective in strengthening the position of local authorities to 'see' the child in the home, local authorities are clear that it endorses this principle and sets an expectation of at least annual contact. However, many local authorities continue to rely heavily on relationship-building and alternative meeting venues and events to enable sight of the child. There is a strong view that the guidance has not provided local authorities with the power needed to compel parents to provide access, and many local authorities consider that the wording (e.g. use of 'should' rather than 'must') and lack of statutory powers limit its effectiveness in guaranteeing direct contact.

Our research has not uncovered strong evidence that local authorities have been able to see more children as a result of the new guidance being published. There are reports of modest gains in the proportion of children seen within a few local authority areas but these increases are mainly attributed to local factors such as increased staff capacity, new local processes, or the arranging of outreach events rather than the guidance itself. There is no consistent national effect that is attributable to the guidance alone, and many local

authorities report either no change or that growing EHE numbers mean an unchanged proportion still equates to many unseen children in their locality.

When applying the statutory guidance, local authorities have experienced, and reported, some common issues. The guidance is sometimes seen as vague or open to interpretation (creating inconsistent application across local authorities) – and a number of specific examples of this are provided throughout the report. Local authorities also feel that the statutory guidance lacks legal powers when families refuse contact. Uncertainty also remains around the standards of evidence required and the attribution of work to the child, and what further action local authorities should take in circumstances where there are doubts about the evidence and the source of the work. Often local authorities also point to practical capacity limits in general (e.g., one officer covering very large, and increasing, caseloads) which makes implementing the guidance challenging. Some local authorities also noted a lack of capacity within legal teams to issue SAOs resulting in the process becoming lengthy and resource-intensive. The time-consuming adversarial contact from organised groups and resource pressures for SAO/legal processes are also perceived as challenges in some areas.

Where local authorities have experienced issues in applying the guidance, local authorities have adapted their operational processes. This evaluation uncovered many examples of how these issues were being addressed by local authorities. Notable promising practice includes:

- improved data capture approaches (such as compulsory online deregistration forms to capture reasons, which enable targeted follow-up)
- RAG-based prioritisation to target limited resource to higher-risk cases
- EHE panels to take decisions in complex/SAO cases
- the use of neutral community venues and enrichment events to encourage attendance and to see learners
- directing Welsh Government funding to (partial) staffing increases
- tailored use of the Welsh Government grant to create dedicated EHE posts and family support (learner grants, equipment, community activities).

Such measures have been successful in some areas - for example, local authorities reported better data capture, more timely visits, and improved engagement as a result, but they remain limited by capacity issues and the guidance's lack of enforceable parental obligations.

Local authorities made several suggestions and proposals on how the guidance could be amended to help address some of the issues raised. Suggestions offered include

- the use of firmer language (where appropriate: 'must'/clearer expectations of parents)

- greater clarification or an improved definition of what counts as 'seeing the child' (e.g. video/group events)
- statutory or clearer requirements for initial evidence at deregistration, stronger expectations around timescales
- a statutory EHE register, clearer separation between education monitoring and safeguarding duties
- practical examples/templates for evidence attribution and families of children with ALN. Many local authorities also request greater legal backing or legislative change to provide enforceable powers where necessary.

Many local authorities also request greater legal backing or legislative change to provide enforceable powers where necessary.

9. Recommendations

This research aimed to explore the effectiveness of the EHE statutory guidance, examine whether local authorities considered their position to 'see' the child strengthened as a result of the guidance, and consider whether any amendments were needed to improve the guidance. Based on the research findings and conclusions, the following recommendations are proposed.

Recommendations for Welsh Government

Recommendation 1: Consider making statutory changes and prioritise targeted measures where evidence suggests a need for further strengthening.

This evaluation has demonstrated that many local authorities view the lack of legal compulsion as the principal barrier to a consistent and adequate approach to checking that EHE learners receive a suitable education. The Welsh Government should consider revisiting the statutory measures where evidence shows it is necessary to do so. This should include consideration of whether specific statutory levers are required

- (a) to enable local authorities to require an initial evidential submission at deregistration
- (b) for an EHE register (or stronger registration mechanism) so all children are consistently visible to services
- (c) a legal compulsion in terms of parents agreeing to let local authorities to see the child. Any legislative change should be subject to an equality/safeguarding impact assessment and stakeholder consultation.

Recommendation 2: Clarify and strengthen wording in the guidance to reduce ambiguity. The Welsh Government should seek to strengthen wording in the guidance where this will improve clarity and practice. Ambiguous 'should' language should include clearer expectations where appropriate (for example around annual contact and reporting timelines) while protecting lawful parental rights or should be strengthened, if possible. A short preface table could also be added to distinguish which parts of the guidance are legal duties and which are advisory or suggested practice. This would reduce inconsistent interpretation across local authorities, strengthen accountability, and provide clearer messaging to families.

Recommendation 3: Clarify guidance on suitability of education and attribution of evidence (including ALN). Local authorities reported difficulties in attributing work to the child and judging the sufficiency of evidence. The Welsh Government should issue clearer guidance (including refreshing Annex A on the assessment of suitability (including where learners with ALN are concerned) and on evidence attribution along with practical examples to reduce disputes and aid consistent decision making. This should be developed with input from EHE and ALN practitioners as well as assessment specialists. The guidance should provide

practical exemplars of acceptable evidence across ages (e.g. primary or GCSE years) including what constitutes demonstrable progress over time. It could include short case studies that show good practice for assessing literacy and numeracy and for attributing work to the child (e.g. in-visit short tasks, or video-recorded activities where consented). This would assist local authority officers (and families) to gain a shared understanding of suitable provision, would lessen ambiguity over what is deemed to be 'suitable and efficient' and reduce inconsistency and subjectivity in interpretation.

Recommendation 4: Strengthen communication of existing guidance requirements and data reporting to support consistent interpretation of 'seeing and communicating with the child'. While the guidance defines that seeing and communicating with the child at meetings to discuss the suitability of education online or in person, local authorities seem to interpret and record these interactions in different ways. As such, the Welsh Government should consider further strengthening its communication of the appropriate sections of the guidance and share good practice examples where local authorities have used the funding to develop activities which provide further opportunities for officers to see and communicate with the child. Furthermore, Welsh Government should seek to revise data reporting templates to: clarify expectations around the range of acceptable approaches and the minimum evidence required in each case, provide worked examples of how different types of engagement (e.g. in person visit, online meeting, observation at group activity) should be categorised and recorded, and encourage consistency in how these data are captured and reported across Wales. This would support greater consistency in local authority practice, allow for more reliable comparison and analysis of data and ensure that the flexibility in the current approach continues to be applied transparently and effectively.

Recommendation 5: Maintain and clarify funding arrangements that support EHE capacity-building and family engagement. The Welsh Government's targeted funding was designed to enhance local authorities' capacity in this area in preparation for the implementation of the new guidance.. As implementation of the statutory guidance continues, it will be important to maintain this additional capacity and avoid loss of expertise or momentum where possible. Within the constraints of annual or shorter-term funding cycles, the Welsh Government should:

- continue to communicate funding intentions clearly and in a timely way to support local authorities' workforce planning
- provide updated clarification on eligible and ineligible uses of EHE funding (e.g. staffing, training, equipment, enrichment activities, but excluding direct financial assistance to families)
- encourage local authorities to plan for sustainability of EHE functions within core resources over time.

Recommendation 6: Encourage structured early engagement and information-sharing at the point of deregistration. The Welsh Government should consider introducing an expectation that parents provide initial evidence at the point of deregistration. This could take the form of a short deregistration pack including an outline educational plan. A standard form should be made available to support consistency, and the approach could be piloted in a small number of authorities before considering whether to make it mandatory. This would assist local authorities to triage cases more effectively, prioritise follow-up, and ensure that engagement begins on the basis of clear information about proposed provision.

Recommendation 7: Share and scale best practice. Local authorities that used community events and neutral venues and those who provided or funded non-statutory group activities reported higher success in getting to see the child. Sharing these best practice approaches would enable low-cost improvements to be scaled. Local authority EHE officers should continue to encourage the use of practical engagement tools and best practice in outreach, enrichment events. An engagement toolkit could be developed of tried-and-tested approaches (coffee mornings, science workshops, community sessions, doorstep/brief contacts) and a small fund made available for local authorities who wish to trial creative outreach approaches in addition to what is already being provided.

Recommendations for local authorities

Recommendation 8: Strengthen EHE capacity and contingency planning to fulfil statutory duties. Given the continued growth in EHE across Wales, local authorities must have sufficient capacity to discharge their statutory duty to ensure that all children of compulsory school age receive a suitable and efficient education. To achieve this, local authorities should:

- undertake regular staffing and caseload reviews to ensure workloads are manageable and proportionate to local EHE numbers, with indicative caseload benchmarks (e.g. no single officer carrying more than X active cases)
- ensure appropriate administrative support to enable officers to focus on engagement and assessment
- use the Welsh Government additional funding to enhance their existing capacity and prepare business cases to sustain essential roles if external funding ceases
- consider cross-training EHE and ALN staff to reduce reliance on single officers and ensure continuity during staff absence or turnover.

This would help ensure local authorities can continue to meet their legal responsibilities effectively, provide consistent support to EHE families, and respond to increasing demand in a sustainable way.

Recommendation 9: Use data proactively to identify and analyse trends. The research uncovered strong examples of local authorities treating EHE data as an active tool for service planning and challenge, not purely a reporting requirement. We recommend that all local authorities should adopt this type of practice in future. This should include routine analysis of deregistration and caseload data by school, year group (highlighting Years 10–11), ALN status, and geography to identify trends and hotspots. Regular (ideally quarterly) EHE insights reports should feed into senior management and school improvement teams so that findings can be used to target outreach, challenge school practice where required, and plan services.

Recommendation 10: Strengthen expectations for early and ongoing engagement with EHE families and direct communication with the child. Local authorities should ensure that both early and ongoing engagement with EHE families are timely, proportionate, and centred on the child, in line with statutory guidance.

- At the point of deregistration, local authorities should meet with families to discuss proposed educational arrangements and to provide clear information about parental responsibilities. This initial engagement should, wherever possible, include direct communication with the child to help establish a baseline understanding of their learning and wellbeing.
- Ongoing engagement should continue to prioritise direct child interaction, normally through in-person or live virtual contact involving active participation by the child. Where this is not immediately possible, local authorities should set defined timescales for follow-up, document reasons for alternative approaches, and make use of neutral venues or group settings to facilitate observation where appropriate.

Clear expectations of this kind would support consistency across Wales, ensure that engagement is meaningful and child-centred, and help local authorities to fulfil their duties to assess the suitability of education in a proportionate and supportive way.

Recommendation 11: Adopt ‘panel oversight’ for complex decisions. Where they do not currently do so, local authorities should seek to adopt panel oversight and use it to proactively review suitability and decide whether to commence SAO action, removing sole decision-making from a single officer. To realise this, local authorities should seek to establish and operate a multi-disciplinary panel. Minimum membership should include the EHE lead, ALN lead, safeguarding officer, educational psychologist (where ALN is suspected) and a legal adviser. The panel should have clearly defined terms of reference, decision-making thresholds, experience of child development and of monitoring the progression of learners to support assessment of evidence, and a written record of panel deliberations and actions. The panel should meet regularly and be able to convene urgently for high-risk cases.

Recommendation 12: Follow existing SAO guidance and ensure timely, consistent escalation. Each local authority should determine who takes the lead for issuing SAOs (i.e. EWS or EHE team) and ensure they adhere to statutory guidance on SAOs, following the timescales and escalation procedures outlined in the All-

Wales Attendance Framework. Local authorities could use the multi-disciplinary panel suggested in Recommendation 12 above to review and sign-off SAO proposals to ensure legal robustness and consistency in decision-making.

Recommendation 13: Adopt practical, family-sensitive techniques to strengthen evidence of suitable learning and build constructive relationships with home-educating families. Local authority officers should continue to routinely use brief in-visit assessment tasks and arrange observations in neutral venues or small group settings to see the child learning. EHE officers should request time-stamped recordings or corroboration from tutors, group leaders or other third parties to validate that work relates to the child where possible. Local authorities should proactively offer neutral meeting spaces and organise outreach events in partnership with voluntary and community organisations to reduce adversarial interactions and encourage ongoing engagement.

Annex A: Discussion guide for interviews with local authority EHE lead officers

Introduction

1. Tell me about your role and involvement with Elective Home Education (EHE) at your local authority
 - *(If EHE officer) Probe re: background prior to becoming an EHE officer*
 - *(If EHE officer) Probe re: any other tasks/roles alongside EHE responsibilities*

Background

2. Who is responsible for leading EHE policy and related activity at your local authority?
 - What is your staffing structure for supporting EHE policy at the local authority?
 - What is the total FTE working on EHE policy and undertaking visits to EHE learners and their families?
 - What is the line management and process of accountability for decision making associated with EHE within the local authority?
 - What is your engagement with local councillors in relation to EHE?
3. Where EHE isn't a positive choice made by families, how do you work
 - with wider LA colleagues? (Probe re: ALN, Inclusion, schools)
 - with families?
4. What use is made of the local data...
 - to identify EHE trends and patterns? (e.g. reasons for EHE, year groups, particular school)
 - to escalate concerns if particular issues are identified?
 - to drive EHE process change or approach within the local authority?
5. How are you using the £50k annual contribution from Welsh Government to enhance capacity to deliver the EHE policy?
 - How are you using the additional contribution received from Welsh Government based on EHE numbers?
 - What additional staff capacity do you now have to deliver the EHE policy?
 - What works well?
6. How have your EHE processes changed (if at all) since the introduction of the statutory guidance?
 - How have families reacted to the change in processes?
 - To what extent has it provided greater clarification? In what way?
 - What issues have you had (if at all) in applying the statutory guidance?

Statutory Guidance – Suitability of the education

7. How do you determine the suitability of education at your local authority?
 - Probe re: visit in person, via virtual visit (e.g. Teams), receive reports from parents
 - How frequently do you carry out this assessment with an EHE learner?
 - Do you prioritise cases, and if so, on what basis?
8. In what way (if at all) has the guidance helped you to assess suitability of education?
 - How useful are the suggested characteristics (see Annex A) outlined in the statutory guidance in enabling you to do this?
 - How have your processes changed (if at all) in terms of assessing suitability of education since the introduction of the statutory guidance?
What issues (if at all) have you had in applying the guidance when assessing suitability of education?
9. What evidence do you ask for when making your assessment to determine suitability of education?
 - How do you attribute any examples of work to the child?
 - Do you request samples⁴ of work by the child, or examples by parents?
 - Does the guidance specify clearly enough about what is needed as evidence?
 - (*If it does not*), how could the guidance be improved?
10. To what extent do parents engage with the local authority regarding visits to determine suitability?
11. What arrangements does your local authority put in place in order to see the child?
12. To what extent has the statutory guidance made a difference to your ability to see the child compared to previously?
 - How many more EHE learners have you been able to see since implementing the statutory guidance?
 - (if increased) What has been the biggest driver to enable that?
 - (if decreased) What challenges do you still face that prevents you from seeing the child?
13. To what extent does the guidance go far enough in affording local authorities with the powers to be able to see the child?
 - (*If it does not*), what else could be included or clarified in the guidance regarding being able to see the child, so that it is strengthened?
 - Are there any gaps in the current statutory guidance regarding local authority powers to see the child?

⁴ Samples refer to actual pieces of student work whilst examples would be illustrative descriptions of the types of activities undertaken or topics covered.

- Is there anything that you would like the guidance to include or clarify regarding the ability of the local authority to see the child?

14. How is the decision to determine suitability of education agreed?

- Who is involved in the process of determining suitability of education?
- Is there a panel for determining this?
- If so, who attends and how does it work?
- If it is an individual officer's decision, how is this signed off?

15. To what extent does the statutory guidance go far enough in affording local authorities the powers to determine the suitability of education?

- (*If it does not*), what else could be included or clarified in the guidance regarding determining the suitability of education so that it is strengthened?
- Are there any gaps in the current statutory guidance regarding local authority powers to determine the suitability of education?
- Is there anything that you would like the guidance to include or clarify regarding determining suitability of education?

School attendance orders (SAOs)

16. Where education is deemed not to be suitable, how is this conveyed to parents?

- Do you provide written feedback on the assessment of suitability of education?
- What support is offered to parents?
- What further action is taken?
- How effective is this?

17. Does the local authority take formal action (e.g. issue SAOs) if you are unable to determine the suitability of education?

- What evidence do you present to support any action taken?

18. Have you issued any SAOs in relation to EHE over the past three years?

- What were the main reasons for issuing these?
- Has your local authority seen an increase in formal action (e.g. SAOs)
- What impact has any formal action had on the suitability of education received by the child?

19. To what extent do you make use of the non-statutory supplementary materials provided by Welsh Government?

- Probe re: use of:
 - initial and follow up EHE letters,
 - templates for parents, to secure child's view, LA report
 - SAO templates
- Are there any additional templates that would be useful to receive?

- To what extent would it be useful if templates were statutory?

Support for EHE families

20. To what extent do you feel that the guidance has clarified the support to be provided to EHE families by the local authority?
21. How do you use the additional monies provided by Welsh Government to support EHE families?
 - How is the grant used to arrange activities with the EHE community to break down barriers?
22. What activities do you arrange (if at all) to build a positive relationship between the local authority and EHE families in your area?
 - Probe re: activities, events, lessons, support made available
 - To what extent do these activities help break down barriers in engaging EHE families?
 - What approach has been most effective, and why?
23. Have any EHE parents asked for the local authority to decide whether their child has additional learning needs (ALN)?
 - What was the nature of the ALN?
 - What impact did the local authority's determination of ALN have (e.g. did the learner return to school)?
24. Does the local authority work with the child and child's parent to identify the appropriate Alternative Learning Provision (ALP)?
 - What ALP is the learner receiving? Where is it delivered?
25. Have any EHE parents requested counselling services via the local authority?
 - How is this determined?
 - How is this delivered?
 - What impact did the counselling have?
26. What youth support services (if any) are offered to EHE families?
 - Does the EHE officer meet with the local authority lead for youth services?
27. How does the local authority support EHE learners to access Careers Services?
 - How are families made aware of Careers Services?
 - How do you know if families have accessed them?

- Does LA meet with Careers Wales to get feedback?

28. How does the local authority support EHE learners access examinations?

- Has the local authority identified an examination centre for EHE learners?
- What examination boards are offered?
- Who funds the examinations?
- How are learners who require access arrangements to take exams supported?

29. To what extent are you currently dealing with queries from home education groups regarding the statutory guidance?

- What problems is this causing (if any)?
- How is it affecting your ability to deliver EHE support?