



ASSOCIATION OF DIRECTORS OF EDUCATION IN WALES  
CYMDEITHAS CYFARWYDDWYR ADDYSG CYMRU

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Buffy Williams MS  
Chair, Children, Young People and Education Committee  
Senedd Cymru

Dear Buffy

### **Inquiry into Children and Young People on the Margins**

Thank you for your letter of 11<sup>th</sup> July seeking ADEW views on a number of school-related issues relevant to this Inquiry. I hope the following responses will be helpful to the Committee.

**The role of schools as protective environments for children who are at risk of marginalisation (i.e. at risk of going missing, being criminalised, or marginalised in some other way). (Frontline stakeholders working with criminally exploited young people told us that none of the young people they work with are attending school).**

Schools play a vital role as a protective environment for all children and young people however this role is more poignant for vulnerable pupils. More often than not, schools are the only constant many of these young people have where boundaries are clear and expectations are high. This does require additional methods of support to be put in place as many of these children and young people display challenging behaviour and/or have difficulties managing their emotions. Developing positive relationships is pivotal in gaining trust and working with the children and young people to promote attendance by providing bespoke timetables with designated interventions to support their wellbeing.

Schools are aware that they have safeguarding duties towards all children on their roll and are part of their community. Most schools have good levels of pastoral care and make reasonable adjustments to support children and young people who are at risk of marginalisation. Schools are expected to follow relevant policies in order to minimise the risk of marginalisation, including Pastoral Support Plans, Attendance, Children Missing Education, Interim Tuition Support, EOTAS (Education Otherwise Than At School) and Safeguarding.

Many schools feel there is a shortfall in resources/capacity to support their vulnerable learners, while the challenges faced in retaining quality pastoral Teaching Assistant support can severely impact schools' ability to provide the best service.

In general, schools make good use of local authority Vulnerable Assessment Profile (VAP) data to support identification of those at risk of disengaging, and there are clear avenues of referral for support services. As part of the Welsh Government Youth Engagement & Progression Framework, the single point of contact (Lead Worker) is considered a particular strength. In some areas, schools are also part of the NEET prevention partnership and/or other structures/referral panels aiming to encourage relevant/bespoke and appropriate education or training placements resulting in greater participation in education.

In one particular local authority, schools can also seek support from the authority's Contextual, Missing, Exploited, Trafficked (CMET) team, who will support children and young people (individually or as a group) in contextual situations. CMET is an initiative of the LA Child and Family Service and is an operational forum that brings together professional organisations from across the authority to discuss concern relating to extra-familial harm (harm outside of the family home). This does not replace safeguarding of individual young people but recognises the important role that communities and partner agencies have in creating safe places and spaces for the authority's children and young people to spend time by taking a more contextual approach to safeguarding. This work is often undertaken in schools.

If a child is refusing to attend school, then all schools in a local authority will be aware of the referral system to the Education Welfare Service (EWS). Often, the EWS is part of a wider Education Welfare and Safeguarding Team, ensuring that Education Welfare Officers (EWOs) have access to clear and accurate safeguarding advice, so they are able to respond to the bespoke needs of the family and the child or young person regarding non-attendance at school. The Welsh Government Attendance grant helping to support this work is widely welcomed.

For children and young people who may not be able to access formal education (school), local authorities must ensure that they have access to appropriate education via their EOTAS systems. However, increased demand without relevant additional resources to meet this demand is a huge ongoing pressure for authorities. In some areas – rural authorities, for example – there are fewer alternative education providers such as training or work-based learning settings, meaning options are reduced.

Wellbeing interventions such as counselling, Emotional Literacy Support (ELSA), and Emotional Based School Avoidance (EBSA), as well as specific wellbeing support for children and young people accessing EOTAS, work well to support marginalised children and young people. All children and young people have access to school and community-based counsellors, both via self-referral and referral from professionals including teaching staff. Many schools also have youth work and/or youth mentor support to call on.

The Welsh Government's Wellbeing Grant is key to schools and local authorities being able to support their learners adequately.

**The extent to which school exclusions place children at additional risk of marginalisation, and whether current guidance allows schools' discretion about whether or not children should be excluded on safeguarding grounds (and the terms of any exclusion that they do make).**

There is evidence to suggest that exclusions have a major impact on children and young people and can put them at additional risk of marginalisation. Opportunities to safeguard the excluded children and young people are missed when they are not in school as there is often little oversight of their whereabouts and behaviours, meaning they may be free to do as they wish. There is also evidence to suggest that exclusion - and especially permanent exclusion - is a traumatising experience for a child or young person, who may feel the rejection acutely. From a school's perspective, it is very challenging.

The Welsh Government's April 2024 guidance<sup>1</sup> makes it clear that mitigating circumstances - including marginalisation - must be considered, as well as ensuring that the school behaviour policy is based on trauma informed approaches with a graduated response to exclusions. However, the decision to exclude is still at the discretion of the headteacher (or senior teacher acting in their place when necessary) and, invariably, when all interventions have been exhausted and serious breaches of behaviour have been incurred, a headteacher will consider permanent exclusion. This is understandable when headteachers must balance the health and safety of all pupils and the school community with the needs of the marginalised child or young person.

Local authorities have a role to ensure that schools follow appropriate process in line with Welsh Government exclusion guidelines and to challenge schools when they feel that the exclusion was inappropriate or not warranted.

### **The merits or otherwise of 'zero exclusion' policies, such as the one adopted by Southwark Council.**

While we feel that the use of exclusion should be reduced, there is a place for exclusion in cases of serious breach of policy or when the safety of the school community is at risk.

### **Concerns expressed by stakeholders about children who are EOTAS about which who has oversight of their well-being and safety when they are outside the maintained school system.**

Schools retain safeguarding and attendance duties for all pupils who are on their roll and should attend all meetings regarding the children and young people. EOTAS staff in most situations will be the first point of contact but schools should remain involved, ensuring regular updates on progress or otherwise and responding accordingly. However, there are concerns that lack of resources may negatively affect schools' ability to adequately support children and young people attending an EOTAS placement.

### **Concerns expressed by stakeholders about their experience of young people they refer to as 'unofficial exclusions' where pupils are not attending school.**

Schools are aware that all exclusions from school should be official and in line with guidance. This is included in all local authority training for senior school staff, governors and clerks to the governing body.

Unofficial exclusions provide the same amount of risk as official exclusions. There are instances where schools will call home etc to avoid an official exclusion, but this still means the pupil is not accessing education for a period of time. These do however generally tend to be for shorter periods - parents will collect children/young people and they will go home for the rest of the day and return the following day. As this is often the 'choice' of the parents, it is not classed as an exclusion.

### **Any other education specific issues relating to missing children or child criminal exploitation alongside any recommendations you would like to see the Committee make in this regard.**

Promoting the importance of positive relationships within educational settings is crucial to children and young people feeling safe, happy and secure enough to communicate with school staff. This can help reduce exclusions and lessen the likelihood of exploitation, criminal activity and general disengagement.

Funding for schools specifically to support children who may be at risk of becoming marginalised and vulnerable to child criminal exploitation such as county lines.

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<sup>1</sup> [Exclusion from schools and pupil referral units \(gov.wales\)](https://gov.wales)

Welsh Government grants to support mental health and wellbeing, attendance and family engagement should continue and be increased in line with need.

Yours sincerely,

*Claire Homard*

**Claire Homard**  
**Chair of ADEW**