

Contact: Zoe Renton, Head of Policy, NCB. 020 7843 6005 [zrenton@ncb.org.uk](mailto:zrenton@ncb.org.uk)

## **Introduction**

National Children's Bureau (NCB) welcomes the opportunity to respond to this consultation. NCB is a leading charity that for over 50 years has been working to improve the lives of children and young people, reducing the impact of inequalities. We work with children and for children to influence government policy, be a strong voice for young people and practitioners, and provide inspiring creative solutions on a range of social issues. In 2014, NCB published *Not present, what future?*, an analysis of the numbers of children missing education across England. We are now undertaking qualitative research, funded by Lankelly Chase, exploring children's pathways to becoming a 'child missing education', drawing upon the voices of children, young people and parents and working with local authority professionals and others to identify principles of effective practice. We would be pleased to share findings with the Department as the research project progresses and when the final report is available in early 2017.

NCB's response focuses on questions in the consultation document relevant to our knowledge and expertise.

**Question 1 a) The proposals set out in this consultation aim to support local authorities (LAs) to carry out their duty to make arrangements to identify children missing education (CME) by strengthening communication and information provided by schools about pupils added and removed from school registers. Will the proposals in the consultation contribute to achieving this aim?**

YES.

If a child is missing education, the state is not fulfilling its obligations under the UN Convention on the Rights of the Child, specifically in relation to the child's right to education (Article 28) and to protection from all forms of abuse, neglect or negligent treatment (Article 19). National Children's Bureau therefore welcomes the proposals outlined in this consultation, placing more comprehensive duties on schools (including Academies and independent schools) to report the removal or addition of pupils to their register to local authorities. This takes a step towards securing better practice in identifying children missing education and ensuring they receive the support they need to get back into learning. However, as the consultation does not include proposals to strengthen local authorities' analysis and use of data, or the quality of investigations where a child is missing from education, it is not clear what impact this change will have on children's learning and other outcomes.

Children missing education – not on a school role or not receiving an education by other means – are likely to be among some of the most vulnerable in our society. As

recognised in the Department of Education's own guidance<sup>1</sup>, these children are at risk of missing out on academic opportunities and not achieving to their potential in their learning, and at risk of being out of education, training and employment in later life. Children missing education are more vulnerable to risks such as female genital mutilation (FGM), forced marriage, and/or being or becoming victims of abuse<sup>2</sup>. Certain groups of potentially already vulnerable children – such as those at risk of harm and neglect, children of Gypsy, Roma and Traveller families, children of the armed forces, runaways and young offenders – are more likely to become a child missing education<sup>3</sup>

Children not attending school may be invisible to other services too, putting them at risk of potential harm and making them more likely to have unmet health needs<sup>4</sup>. It is this level of invisibility – of children being 'off the radar' – which makes it vital that every effort is made to identify children missing education, engage them back into learning and other necessary services, and to prevent children from disengaging from the school system in the first place.

NCB believes it is unfortunate that government does not regularly collect, analyse and publish data on children missing education. This makes it very difficult to establish an accurate picture of the extent of the problem, monitor trends and scrutinise performance by local authorities, schools and their partners. NCB sought to address this gap in our 2014 report, *Not present, what future?*, which was based on a freedom of information request to all local authorities. We found that:

- Across 79 local authorities, on a given day, over 7,000 children were recorded as missing education
- Across 45 local authorities, on a given day, there were over 1,000 children recorded as missing education whose whereabouts was unknown to the local authority
- There is wide variation in the numbers of children recorded as missing education across different local authorities, ranging from over 500 children to zero.

NCB concluded that differences in levels of CME across authorities, in part, indicated variation in the quality of identification and monitoring of children missing education and the collection of data, as well as potential differences in authorities' effectiveness in keeping children in education or reintegrating them effectively. In its 2013 review into children missing out on education, Ofsted found evidence of local authorities holding poor or incomplete information about CME in the local area. Only five out of the 15 local authorities regularly gathered and analysed information on CME, including numbers of CME, length of time missing education and what alternative provision they were receiving. This is vital if local authorities are to effectively track their children's progress or assess on the quality and

---

<sup>1</sup> Department for Education (2015) *Children missing education: Statutory guidance for local authorities*. London: DfE.

<sup>2</sup> House of Commons Home Affairs Committee (2013) *Child sexual exploitation and the response to localised grooming: Second Report of Session 2013–14*. London: House of Commons; House of Commons Home Affairs Committee (2011) *Forced marriage: Eighth Report of Session 2010–12*; Botham, J. (2011) The complexities of children missing from education: a local project to address the health needs of school-aged children. *Community Practitioner*. 84(5) pp.31-34.

<sup>3</sup> See footnote 1

<sup>4</sup> Botham, J. (2011) The complexities of children missing from education: a local project to address the health needs of school-aged children. *Community Practitioner*. 84(5) pp.31-34.s

appropriateness of their services and support. Reductions in funding for education welfare services may make this work more challenging.

The proposals in this consultation do not address inconsistencies across local authorities in their collection and analysis of data on children missing education, or the quality of investigations (in partnership with schools) to locate children. **We urge the Department for Education to strengthen guidance and advice for local authorities on the collection and analysis of CME data. In addition, the Department should assess the impact of reduced resources within education welfare services on local authorities' ability to identify and re-engage children missing education and prevent children from falling out of the school system.**

By putting in place more rigorous requirements around schools notifying local authorities where a child is taken off/added to the register, we can expect that authorities will be able to hold more accurate data about the numbers of children missing education in their area. **We therefore urge government to reconsider its position and to collect, and publish annually, data on children missing education, by local authority. This is vital if national and local governments are to be held to account for the quality of data gathered about children missing education and, over time, efforts to reduce the number of children falling out of the school system.**

**Question 2. Do you agree that schools and LAs should collaborate when making 'reasonable enquiries' about the whereabouts of a pupil, before the pupil's name can be deleted from the register under regulation 8(1)(f) and 8(1)(h)?**

YES.

As stated above, our freedom of information request conducted in 2014 found that across 45 local authorities there were over 1,000 children missing education whose whereabouts was unknown the local authority. It is vital that schools and local authorities (along with other relevant services) work together to find such children, who may be at risk of harm and neglect as well as poor educational outcomes. NCB is concerned that the government's commitment to weaken the role of local authorities in running schools<sup>5</sup>, and the proliferation of Academies and free schools, may undermine this goal. **The Department for Education should clarify how it will monitor Academies', free schools' and independent schools' fulfilment of their notification duties, and what action will be taken when schools do not fulfil their duties.**

**Question 3 a) Should schools only be required to report to their LAs pupils removed from their registers and pupils added to their registers at non-standard transition points (i.e. whenever a compulsory school-aged child leaves their school before completing that school's final year group)?**

NO.

---

<sup>5</sup> HM Treasury (2015) *Spending Review 2015*. London: HM Stationery Office

When responding to our request for information about the main reasons for children missing education, a number of local authorities referred to children failing to enrol in school or transition between schools (cited as the main reason in 2% of cases). Requiring schools to provide comprehensive information about pupils they are adding to and removing from their register will help local authorities to gain a more accurate picture of children missing education in their area and help to prevent children falling off the radar at key transition points. **We urge the government to require all schools to notify their local authority when removing/adding pupils from/to their register at standard transition points.**

Zoe Renton  
Responding on behalf of National Children's Bureau  
8 Wakley Street, London EC1V 7QE  
020 7843 6000