

1. Name/Name of Organisation/other body (*optional*)

Dr Paula Rothermel FRSA, Chartered Educational psychologist

**2. Please select the category that best describes you as a respondent:
(Please tick one box only)**

Parent/Guardian	
Pupil	
Member of School Staff (Teaching)	
Member of School Staff (Non-Teaching)	
Governor (individual)	
Board of Governors (Please insert name of school) _____	
Education/Sectoral Support	X
Political Representative	
Local Government Representative	
General Public	
Other (please specify) _____	

3. Having read the Draft Policy for Elective Home Education, I consider that the draft policy:	Agree	Uncertain	Disagree	Not applicable
3.1 Provides relevant information about the Board's responsibility for Elective Home Education, clearly and concisely			X	
3.2 Outlines the procedure to be followed should parents decide to home educate their children			X	
3.3 Provides parents with a greater understanding of their role/responsibilities when deciding to home educate their children			X	
3.4 Provides parents with a greater understanding of the Board's statutory role/responsibilities for Elective Home Education			X	
3.5 Clarifies the role of the Education Welfare Service/Officer in relation to children who are home educated			X	
3.6 Clarifies the role of the School/School Principal in relation to children who are home educated			X	
3.7 Clarifies the role of other agencies in relation to children who are home educated			X	
3.8 Highlights the importance of establishing arrangements for safeguarding children/young people who are home educated			X	

Cont. 3. Having read the Draft Policy for Elective Home Education, I consider that the draft policy:	Agree	Uncertain	Disagree	Not applicable
3.9 Provides information and clarifies the role of the 'Named Officer' as appointed by the Board			X	
3.10 Provides appropriate information about the arrangements for and frequency of monitoring			X	
3.11 Highlights the minimum standards that will be used for monitoring purposes			X	
3.12 Signposts resources/information that may be useful for parents who are home educating			X	
3.13 Provides information about the process to be followed to facilitate children with identified Special Educational Needs			X	
3.14 Provides parents with sufficient information to contact the named Board Officer			X	
3.15 Overall, I consider that this draft policy provides me with a clear understanding of provision for Elective Home Education for children within the Board's area			X	

Please use the space below to comment further:

I am a Chartered Educational Psychologist and one of the leading academics in the field of home education in the UK. My doctoral thesis on home education (1996-2002) remains the largest and most in-depth and authoritative independent of home education carried out in the UK. I am also the only expert witness specialising in court cases where home education is an issue.

In 2009, I was invited to meet with Graham Badman and contribute to the Badman Review on Elective Home Education in England. I further submitted evidence to the July 2009 Children, Schools and Families Committee (the Parliamentary Select Committee with oversight of the work of the Department for Children, Schools and Families) which had announced its own inquiry into the handling of the Badman Review on Elective Home Education in England. My work was subsequently discussed at two Westminster Debates.

Having reviewed the draft policy, I am concerned by the non-existence in the review of an executive summary outlining a carefully catalogued and researched problem that needs to be addressed. In the absence of an established issue that demands a response, the recommendations that establish a mandatory monitoring system appear arbitrary and overly intrusive. It is on that basis that I have responded with "disagree" to the various policy questions, as I reject the premise that a problem exists, without a rationally established justification.

Secondly, I am troubled by the wording in section 3(v) of the policy which states that it is the duty of the Education and Libraries Board "to ensure that children in their area are receiving full time education..." Section 13 of the Education and Libraries (Northern Ireland) Order 1986 does not entrust such a duty. It instead states "If it appears to a board that a parent of a child of compulsory school age in its area is failing to perform the duty imposed on him by Article 45, it shall serve notice in writing on the parent requiring him to satisfy that board, within such period (not being less than fourteen days beginning with the day on which the notice is served) as is specified in the notice, that the child is, by regular attendance at school or otherwise, receiving suitable education."

Please use the space below to comment further:

Section 13 mirrors the legal situation in England, Wales & Scotland where local education authorities have no statutory duty to routinely inspect and evaluate the quality of home education as a matter of course. Instead, local authorities follow the legal requirements (which are similar to Section 13) in only intervening when they are alerted by a reasonable reason to do so. In that light, the compulsory "Monitoring of Elective Home Education Programmes" that is suggested in Section 7 (iii) of the draft policy would be entirely unwarranted and inappropriate.

In the absence of any stated research in the draft policy; I can only speculate that the Northern Ireland Education and Library Board has made assumptions about the overall wellbeing of home educated children. My 2002 research involved 1099 children and remains the largest and most in-depth and authoritative independent of home education carried out in the UK. The research involved 419 survey questionnaires to families and 238 targeted assessments (with 196 different children) to evaluate the psychosocial and academic development of home-educated children aged eleven years and under.

The results show that 64% of the home-educated Reception aged children scored over 75% on their PIPS Baseline Assessments as opposed to 5.1% of children nationally. The National Literacy Project (Years 1,3,5) assessment results reveal that 80.4% of the home-educated children scored within the top 16% band (of a normal distribution bell curve), whilst 77.4% of the PIPS Year 2 home-educated cohort scored similarly. Results from the psychosocial instruments confirm the home-educated children were socially adept and without behavioural problems. Overall, the home-educated children demonstrated high levels of attainment and good social skills.

For all these reasons, I find that the policy recommendations regarding mandatory monitoring and supervision of home educators in Northern Ireland are arbitrary, legally unjustified, unwarranted and open to misunderstanding. I would recommend that the Education and Library Board instead concentrate their funding and resources in supporting home educators through voluntary and non-intrusive schemes.

4. Equality Consideration

Under Section 75 of the Northern Ireland Act 1998 all public bodies are obliged to consider the implications of any decisions on nine different groupings before decisions are implemented.

The two duties within this Equality legislation include promoting equality of opportunity and promoting good relations between all communities.

The equality of opportunity duty requires that the Boards shall, in carrying out all their functions, powers and duties, have due regard to the need to promote equality of opportunity:

- 1. Between persons of different religious belief.**
- 2. Between persons of different political opinion.**
- 3. Between persons of different racial groups.**
- 4. Between persons of different age.**
- 5. Between persons of different marital status.**
- 6. Between persons of different sexual orientation.**
- 7. Between men and women generally.**
- 8. Between persons with a disability and persons without.**
- 9. Between persons with dependants and persons without.**

The Good Relations Duty requires that the Boards shall, without prejudice to their equality obligations, have regard to the desirability of promoting good relations:

- 1. Between persons of different religious belief.**
- 2. Between persons of different political opinions.**
- 3. Between persons of different racial groups.**

In light of these obligations do you consider that review of primary provision in the area will impact positively or negatively on either Equality of Opportunity or the Promotion of Good Relations in any way?

Section 75 Category	Positive	Negative	Don't Know
Religious Belief			
Political Opinion			
Racial Group			
Age			
Marital Status			
Sexual Orientation			
Gender			
Disability			
Dependants			

If you ticked any of the above boxes please clarify your reason:

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Thank you for completing this survey. Your privacy is very important to us and we have taken every step to ensure your confidentiality and the security of your data. We will not at any time, release your personal data to third parties.