

Lancashire County Council
Internal audit report

Elective Home Education

Final Report – December 2010

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1 Overall assessment

- 1.1 We have completed a review of the arrangements in place within the council to ensure that those families who elect to home educate their children have appropriate arrangements in place to provide an effective full-time education. The council has no statutory obligation to monitor the quality of home education but, under Section 437(1) of the Education Act 1996, there is a requirement that the council will intervene if it appears that parents are not providing a suitable education. The responsibility for ensuring that home educated children are receiving a suitable education currently lies with the council's Elective Home Education (EHE) team.
- 1.2 The council has a statutory responsibility to have arrangements in place which will enable children educated at home to be identified and for assurance to be obtained that a suitable education is being provided. The responsibility for establishing the identities of children who are not receiving a suitable education is with the council's Children Missing Education (CME) team.

Opinion

- 1.3 The audit work we have undertaken allows us to provide **substantial** assurance over the procedures in place for the management of elective home education.
- 1.4 The assurance we can provide over any area of control falls into one of four categories as follows:

Full assurance: there is a sound system of internal control which is adequately designed to meet the council's objectives and is effective in that controls are being consistently applied.

Substantial assurance: there is a generally sound system of internal control, adequately designed to meet the council's objectives, and controls are generally being applied consistently. However some weakness in the design and/ or inconsistent application of controls put the achievement of particular objectives at risk.

Limited assurance: weaknesses in the design and/ or inconsistent application of controls put the achievement of the council's objectives at risk.

No assurance: weaknesses in control and/ or consistent non-compliance with controls could result/ has resulted in failure to achieve the council's objectives.

Significant findings

- 1.5 In September 2008, due to concerns around the infrequency of visits to home educated children and the ability of the local authority to ensure they were safe, the CYP Overview and Scrutiny Committee established a task group to investigate the provision of EHE monitoring and to gain a

greater understanding of EHE issues. The task group met between October 2008 and March 2009 and presented their report and recommendations to the Overview and Scrutiny Committee on 24 March 2009.

- 1.6 The recommendations made by the task group were considered by the CYP Overview and Scrutiny Committee and a number of recommendations were temporarily held pending the outcome of a national review, the Badman report.
- 1.7 The Badman report identified a number of recommendations which if implemented, would place a significantly higher level of responsibility on local authorities for the registration, monitoring and assessment of all children who are home educated. Following the release of the report, a consultation period was launched when there was opposition from independent home education organisations and home educating parents. Consequently, and following the election of the new government, the recommendations in the Badman report were not agreed.
- 1.8 Since the rejection of the Badman report there does not appear to have been a review of the CYP Overview and Scrutiny Committee report and recommendations from March 2009. It may be that some of these recommendations are still relevant and may be implemented for Lancashire.
- 1.9 The council does not review all of its available pupil data to identify children who may be missing education. The council has a statutory duty under section 436A of the Education Act 1996, to make arrangements to enable them to establish the identities of children in Lancashire who are not receiving a suitable education. The CME team undertakes a half termly review of high school pupil information to identify pupils who are no longer registered at a school. A review of primary school pupil data is not however undertaken due to a lack of staff resources.
- 1.10 There is also a difficulty for the council in establishing the identities of those children who have never been registered with an education provider. The council is reliant upon notifications from external agencies and other service teams to identify those children. There are no formal arrangements for the sharing of data between the council and external agencies, on a pro-active basis.

1.11 The case loads of EHE support officers have significantly increased over recent years as shown in the table overleaf. In addition, the number of visits undertaken by the EHE support officers has increased due to the change in the needs of the children and families. Consequently, delays have occurred in the assessment of some families, particularly in the event of the unforeseen absence of key staff.

| Period | Number of EHE Cases |
|---------------------------|----------------------------|
| Spring 2000 | 193 |
| Spring 2001 | 226 |
| Spring 2002 | 226 |
| Spring 2003 | 277 |
| Spring 2004 | 314 |
| Spring 2005 | 338 |
| Spring 2006 | 400 |
| Spring 2007 | 485 |
| Spring 2008 | 466 |
| Spring 2009 | 522 |
| Spring 2010 (13 May 2010) | 444** |

** Reduction has been explained due to a delay in the notification of secondary school placements and an improvement in communication with schools.

1.12 The caseloads and available capacity of EHE support officers are monitored on a regular basis and the information is provided to the head of the EHE service. However, the EHE service do not monitor against key performance indicators such as, the timeliness of initial visits or the timescales for issuing reports.

Risk assessment and our recommendations

1.13 Our detailed findings and recommendations are set out in Section 5 of this report. We have assigned rankings of the perceived risks to the arrangements for identifying those families who have elected to home educate their children and hence the urgency with which management should take remedial action. In summary our recommendations fall into the following categories:

| Risk/ priority | Total |
|-----------------------|--------------|
| Extreme residual risk | 0 |
| High residual risk | 0 |
| Medium residual risk | 7 |
| Low residual risk | 1 |
| Total | 8 |

1.14 Each of the recommendations made in Section 5 are drawn together in an action plan shown separately at Appendix A.

Categorisation of our recommendations

1.15 We have categorised the issues we have raised in this report in the context of the residual risk to which the council is exposed. Our recommendations are therefore defined as 'extreme', 'high', 'medium' or 'low' in relation to the residual risk they are designed to address.

Extreme residual risk

1.16 Critical and urgent in that failure to address the risk could lead to one or more of the following occurring: catastrophic loss of the county council's services, loss of life, significant environmental damage or huge financial loss, with related national press coverage and substantial damage to the council's reputation.

High residual risk

1.17 Critical in that failure to address the issue or progress the work could lead to one or more of the following occurring: failure to achieve organisational objectives, disruption to the business, financial loss, fraud, inefficient use of resources, failure to comply with law or regulations, or damage to the council's reputation.

Medium residual risk

1.18 Less critical, but failure to address the issue or progress the work could impact on operational objectives and should be of concern to senior management.

Low residual risk

1.19 Areas that individually have no major impact on achieving the council's objectives or on the work programme, but where combined with others could have an effect at the process level, which could give cause for concern.

Acknowledgements

1.20 We would like to acknowledge the support of the head of Lancashire Education Inclusion Service (LEIS), the EHE administrative assistant and the children missing education (CME) county co-ordinator for their input and support to this review.

2 Overall objectives of our work

2.1 This review has been undertaken as part of the 2009/10 audit plan, to assess the adequacy and effectiveness of the arrangements in place for the council to ensure that those families who elect to home educate their children provide a suitable full time education.

Risks

2.2 In outline, the potential risks against which we have assessed the systems are as follows:

- The council does not have arrangements in place to enable those children who are not registered at mainstream schools or other education providers to be identified;
- Council guidelines do not consider continuously changing statutory guidelines;
- Inappropriate assessments are undertaken which do not adequately evaluate the family situation and the child does not receive a suitable education;
- There is no strategic lead identified within the council to ensure that there is appropriate ownership of the service; and
- The directorate does not comprehensively assess all of the children identified as missing from education.

External audit assurance

2.3 We have prepared this report solely for the use of Lancashire County Council and it would not therefore be appropriate for it or extracts from it to be made available to third parties other than the external auditors. We accept no responsibility to any third party who may receive this report, in whole or in part, for any reliance that they may place on it and, in particular, we expect the external auditors to determine for themselves the extent to which they choose to utilise our work.

3 The scope of our work

3.1 Our work has covered the period from April 2009 to May 2010. The data which has been used to select samples of EHE cases for closer scrutiny and to test the controls which have been identified, has been taken at a real point in time in 10 May 2010.

3.2 The audit work has been carried out has involved visiting and liaising with the EHE team to obtain information and data. The review has included:

- Discussions of the arrangements in place within the EHE team;
- The identification of system controls and procedures in place to identify those children who are being home educated and how the suitability of the education provision is assessed; and

- Sample testing of data to determine the effectiveness of the controls in place.

- 3.3 We have also undertaken discussions with the children missing education co-ordinator to determine the arrangements for the identification of those children who are resident within Lancashire but who are missing from education and the level of interaction with the EHE team.
- 3.4 As part of the 2008/09 audit plan, we undertook a review of traveller education. Although the findings of the review are not specific to the EHE service, many traveller children are home educated and there is close liaison between the Gypsy Roma Traveller Achievement Service (GRTAS) and Lancashire Education Inclusion Service (LEIS). We have therefore undertaken a follow up of the recommendations made in the audit report to verify that they have been adequately implemented.

4 Background and context

- 4.1 The council has a statutory responsibility to identify those children who are residing in Lancashire but who may not be receiving a suitable level of education. The council must ensure that there are procedures in place to ensure that these children can be identified quickly and that an effective tracking system is in place.
- 4.2 Legally, the responsibility for a child's education rests with their parents and whilst education is compulsory, attending school is not. Parents may therefore elect to home educate their children and are not legally required to register or seek approval from the authority. The council has no statutory duties in relation to the monitoring of the quality of home education on a routine basis. The role of the council should be a supportive one. The council does however, have a statutory responsibility to make arrangements to safeguard and promote the welfare of children.
- 4.3 The council's EHE team was established in 2001 and is managed as part of the LEIS.
- 4.4 The EHE team maintains a management information system database to record the cases identified. The numbers of home educated children has steadily increased. In spring 2001 there were 226 cases registered with the council and this has increased up to 522 in Spring 2009. At the time of the audit there were a total of 444 cases of which 425 were active. The remaining 19 cases had been referred to the CME team.
- 4.5 The CME team was established from 1 August 2008 as part of the redesign of children's services. The team has been established to work with children who are not receiving a suitable education.
- 4.6 There are 9 part-time EHE support officers (3fte) who manage the EHE cases. The cases are allocated to the EHE support officers based on the specific number of hours for each case.

5 Detailed findings

Governance arrangements

- 5.1 A recent restructure incorporating the EHE service has resulted in the service being incorporated into the Targeted and Early Intervention Service group of the CYP directorate from January 2011 onwards. There is currently no service manager for the service, however, it has been identified that the head of quality and continuous improvement will be the strategic lead from January 2011.
- 5.2 This is a recent decision, and we **recommend** that the service should be fully integrated into the appropriate structure of the CYP directorate as soon as possible in order that appropriate ownership of the service can be achieved. Governance and reporting arrangements should be clarified.
(Recommendation 1: **Medium** risk/ priority)
- 5.3 The Head of LEIS has presented regular reports to the Overview and Scrutiny Committee of the council. In July 2008, a report was presented which outlined the current position for EHE and identified the concerns with regard to the infrequency of visits to those children being home educated and the ability of the council to ensure that these children are safe.
- 5.4 Following this report, a task group was established which met between October 2008 and March 2009, which produced a report and identified a number of recommendations. The report mirrored the issues and recommendations made in the Badman report (2009).
- 5.5 The recommendations made by the task group were considered by the CYP Overview and Scrutiny Committee and were temporarily put on hold pending the outcome of the Badman report.
- 5.6 The Badman report identified a number of recommendations which if implemented, would have placed a significantly higher level of responsibility on Local Authorities for the registration, monitoring and assessment of all children who are home educated.
- 5.7 Following the release of the report, a consultation period was launched when there was opposition from independent home education organisations and home educating parents. Consequently, and following the election of the new government, the recommendations in the Badman report were not agreed.
- 5.8 Since the rejection of the Badman report there does not appear to have been a review of the CYP Overview and Scrutiny Committee report and recommendations from March 2009. It may be that some of these recommendations are still relevant and may be implemented for Lancashire.
- 5.9 We **recommend** that the recommendations made to the Overview and Scrutiny Committee should be reviewed and reconsidered by the directorate to see if they should be implemented.
(Recommendation 2: **Medium** risk/ priority)

- 5.10 In order to ensure that effective arrangements are in place with other key service teams, we can confirm that regular meetings are undertaken to ensure that the service teams liaise and maintain accurate records about the children they support. The following multi service/ agency meetings have been identified which are attended by EHE staff and other key stakeholders; minutes of which were obtained and examined;
- GRT/ CME Case Conference Group;
 - EHE service team meetings; and
 - Case referral meetings between EHE and CME.

Elective Home Education guidance documents

- 5.11 The Department for Education ((DfE) has produced guidelines for local authorities to identify children not receiving a suitable education and for Elective Home Education (EHE).
- 5.12 The Children Missing Education (CME) team has recently established formal guidelines and a practice document to assist the council to put in place robust systems for identifying those children who are not receiving an appropriate education. The document includes guidance for the sharing of information. At the time of the audit the document was in draft format and had not been formally approved.
- 5.13 The systems which should be followed once a child has been identified as being home educated have been summarised into easy to read flowcharts which have been provided to the EHE staff, senior managers and the CME team.
- 5.14 We **recommend** that the CME guidelines and practice document should be finalised and implemented.
(Recommendation 3: **Medium** risk/ priority)
- 5.15 In addition, the council's EHE team has considered the content of the available DfE guidance and has produced a written policy and procedural guidance for parents and staff, to enable the council to fulfil its statutory responsibilities regarding children who are being educated at home.
- 5.16 The purpose of the document is to assist the council and home educators to build effective relationships of mutual trust to ensure that the interests of home educated children are safeguarded.
- 5.17 The procedures in place include practices which should be followed when receiving an initial enquiry about EHE, after receiving notification of new cases and the procedures for the follow up and production of parental reports.
- 5.18 The EHE support officers undertake an initial visit with the families and an assessment of the circumstances and the education provision to determine its suitability. An annual visit is then undertaken. However, the DfE guidance for EHE 2007 (paragraph 2.7) states that '*local authorities have no statutory duties in relation to monitoring the quality of home education on a routine basis*'.

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- 5.19 Whilst the council must intervene where it appears that parents are not providing a suitable education, it is questionable whether the council has taken an excessive role in the assessment process.
- 5.20 Indeed, in some cases, where parents do not wish to participate with the EHE support officers in home visits (and they are not legally obliged to do so), a questionnaire is submitted to the parents for completion and parents are requested to submit evidence of the education provision as an alternative measure, for evaluation by the EHE support officers.
- 5.21 We acknowledge that the council have a duty to safeguard and promote the welfare of children. We understand from discussions with the head of EHE service that in order to support the directorate's remit on safeguarding, wherever possible the EHE support officers undertake annual visits to ensure that the children who are educated at home are seen.
- 5.22 We **recommend** that the content of the DfE guidance for EHE should be reviewed against the current procedures in place within the council to ensure that the correct level of service is provided. This recommendation should be considered alongside recommendation 2.
(Recommendation 4: **low** risk/ priority)
- 5.23 Where an assessment of the quality of education and the quality of a child/ young person's social skills is undertaken, there is no guidance or framework in place for the EHE support officers to follow. Home educators do not have to:
- follow the national curriculum;
 - have a timetable or give formal lessons;
 - have premises equipped to a set standard;
 - have set hours during which education takes place;
 - have any specific qualifications; or
 - make detailed lesson plans or formally assess progress or development.
- 5.24 There is a concern that without a formal framework for assessing the suitability of the education provision, the EHE support officers may not produce adequate or consistent assessments and may not identify instances where the education provided is unsuitable.
- 5.25 We understand that the EHE support officers make a value judgement to determine the effectiveness of the education provision by determining whether it is based around the appropriate key stage and that evidence is obtained.
- 5.26 In addition, the EHE support officers who undertake the assessments are required to complete standard documentation during the assessment which is reviewed and certified by a senior manager prior to a decision being made about the suitability of the education provision and the social skills of the young person. The parents are required to provide evidence to support the discussions. Following the assessment, a report is produced which considers and identifies findings based around the Every Child Matters agenda.
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- 5.27 We **recommend** that a documented framework should be produced for use by the EHE support officers when undertaking an assessment of the quality of the education provided.
(Recommendation 5: **Medium** risk/ priority)

Safeguarding

- 5.28 The EHE support officers are qualified LEIS teachers and are employed by the LEIS service who are contracted to the EHE team. The EHE support officers receive appropriate training as part of their employment with the LEIS service.
- 5.29 We have confirmed with the council's HR service that all of the EHE support officers have up to date CRB clearances and that they are checked by the council on a three-year basis.
- 5.30 In some instances parents may employ other people to teach their child. It is not the council's responsibility to perform CRB checks for the teachers employed by the parents. The parents are responsible for obtaining assurance that appropriate checks are carried out to verify that they are suitable to have access to children.
- 5.31 Whilst the council does not undertake such checks, the EHE support officers consider the arrangements which have been undertaken as part of the assessment process to determine the adequacy of the education provided.
- 5.32 In addition, we can confirm that there is reference to the requirement for safeguarding checks to be carried out included in the DfE guidance and in the council's EHE protocol and procedures document.

Children missing education

- 5.33 The CME team are responsible for ensuring that the council has appropriate systems and procedures to identify those children who reside in Lancashire but who are missing from education and for ensuring that appropriate action is taken.
- 5.34 From discussions with the CME coordinator we understand that the CME team undertake a half termly review of secondary school pupil data to identify pupils who may be missing from education.
- 5.35 The review includes secondary short stay schools, but due to a lack of resources, does not include primary school pupil data or the Alternative and Complementary Education and Residential Service (ACERS). The CME team relies upon referrals from other sources to identify primary school children missing education, for example attendance consultants, early intervention teams and schools.
- 5.36 The pupils identified are tracked to ensure that they continue to receive a suitable education and referrals are made to key service teams, where identified eg. EHE, GRT, other council's etc.
- 5.37 We **recommend** that there is a full review of the pupil data available to the council, including mainstream primary school pupil data, primary short stay school data, ACERS and special schools, to ensure all children who may be missing from education are identified.

(Recommendation 6: **Medium** risk/ priority)

5.38 There are also issues ensuring that pupils who have never been registered with a formal education provider can be identified. The CME team relies on information from other agencies and service teams to identify these families. In an attempt to reduce the risk, the team have undertaken multi-agency awareness sessions, information has been posted on the service website and sent to voluntary agencies and key contacts within the health service and library service have been contacted.

5.39 We **recommend** that the service should consider establishing a more pro-active approach to identifying those children who have never registered with an education provider. This could include the establishment of formal data sharing agreements with key agencies.
(Recommendation 7: **Medium** risk/ priority)

EHE assessments

5.40 Referrals to the EHE team are received from a number of sources including:

- CME team;
- Gypsy Roma Traveller Achievement Service (GRTAS);
- Schools;
- Advisory Service;
- Lancashire Young Peoples Service (LYPS);
- Lancashire Youth Offending Team (LYOT);
- Pupil Attendance;
- Pupil Access Team;
- Children's Social Care; and
- Health Service.

5.41 Once referred, to the EHE team, pupil and family details are recorded onto the MIS database which is maintained by the EHE administrative officer. The database is a comprehensive record of the registration, assessment and monitoring arrangements for the individual children.

5.42 A review of the MIS database was undertaken as at 13 May 2010. At this time there were 444 cases recorded on the database of which 425 were active. A random sample of 20 cases were examined in detail and the information recorded was considered against the protocol and procedural guidance documents to ensure that council procedures have been followed. The following information was considered:

- The registration date;
- The initial assessment date;
- Follow up reviews;
- Evidence that annual visits have taken place;

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- Referral to CME where applicable;
 - Parental agreements; and
 - Manager approval/ authorisation of assessment.
- 5.43 We have identified four instances where delays of up to five months had occurred between the date of the referral/ registration and the date of the initial assessment. The assessments of two of these cases had been delayed due to the unforeseen long term absence of one of the EHE support offices.
- 5.44 A further review of the EHE MIS database revealed that a total of 90 cases had been referred but at the time of the audit had not received an initial home visit by the EHE support officers.
- 5.45 We have selected a sample of 17 of these cases (based upon the length of time without an initial visit) and acknowledge that in 12 of these cases attempts had been made to undertake visits to the families, either without success, or visit dates have been arranged but cancelled by the parents.
- 5.46 A further three cases relate to traveller families who have been difficult to contact due to them being transient. Two cases have not been assessed due to the unforeseen long term absence of the EHE support officer.
- 5.47 A review was undertaken regarding the caseload of an EHE support officer who had been absent for a period of time. It was noted that 15 cases had been referred but no initial visit had been undertaken. The longest period without assessment was identified as one year, although we can confirm that attempts have been made to visit this family prior to the absence of the EHE support officer. Action is currently being taken to ensure that the delayed cases are prioritised for assessment.
- 5.48 The overall number of EHE cases has increased steadily over recent years. At the time of the audit there were 444 cases of which 425 were active. In addition, due to changes in the needs of the children and families who are electing to home educate, the number of visits which are undertaken to individual families has also increased. This has contributed to the delays in the initial assessment of some children.
- 5.49 We **recommend** that:
- a) In the event of unforeseen absences of EHE support officers appropriate action should be taken to ensure that prompt visits/ assessments of newly referred cases can continue to be undertaken; and
 - b) Management should monitor the time taken to perform initial assessments, follow-up visits and issue reports to enable service delivery to be improved.
- (Recommendation 8: **Medium** risk/ priority)
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Previous audit recommendations

- 5.50 A review of the implementation of the recommendations made during a 2008/09 audit review of the traveller education service has been undertaken.
- 5.51 We have confirmed that action has been taken to address all of the recommendations made.

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Action plan

Appendix A

| Issue | Implication | Residual risk | Recommendation and management response/ action plan | Responsible officer and implementation date | |
|-------|---|---------------|--|---|---|
| 1 | The EHE's position within the CYP directorate has not yet been formally determined due to the ongoing restructure of the directorate. Consequently a strategic lead for the service has yet to be agreed. | Medium | Governance arrangements are not fully embedded. The council may fail to comply with its statutory responsibilities. | The EHE service should be fully integrated into the appropriate group of the CYP directorate as soon as possible in order that appropriate ownership of the service can be achieved. Governance and reporting arrangements should be clarified. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and Head of Development & Innovation |
| 2 | The actions of the EHE service may not comply with the recommendations made by the Overview and Scrutiny Committee. | Medium | The recommendations made to the Overview and Scrutiny Committee should be reviewed and reconsidered by the directorate to see if they should be implemented. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and Head of Development & Innovation | |
| 3 | The council may not have effective procedures for the identification of children missing education. | Medium | The CME guidelines and practice document should be finalised and implemented. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | County Pupil Access Manager | |

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| | Issue | Implication | Residual risk | Recommendation and management response/ action plan | Responsible officer and implementation date |
|---|--|---|---------------|--|--|
| | been agreed. | | | | |
| 4 | Current arrangements for the visit, assessment and monitoring of education for those families who elect to home educate their children may exceed the recommendation made in the DfE guidance. | The council may be exceeding its statutory responsibilities with regard to EHE. Service provision may be inefficient. | Low | The content of the DfE guidance for EHE should be reviewed against the current procedures in place within the council to ensure that the correct level of service is provided. This recommendation should be considered alongside recommendation 2. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and LEIS Senior Manager |
| 5 | The EHE support officers do not have a formal, documented framework to follow when undertaking an assessment of the quality of the education provided. | The assessments may be inadequate or inconsistent and may not accurately determine the suitability of education provision. | Medium | A documented framework should be produced for use by the EHE support officers when undertaking an assessment of the quality of the education provided. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and LEIS Senior Manager |
| 6 | At present, the CME service does not consider all available data when undertaking a review to identify children who are missing education. | The council does not comply with statutory guidance by ensuring that all children who are missing education can be promptly identified and tracked. | Medium | There should be a full review of the pupil data available to the council, including mainstream primary school pupil data, primary short stay school data, ACERS and special schools, to ensure all children who may be missing from education are identified. Management response: Agreed in principle. To be taken | Head of Quality & Continuous Improvement |

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| | Issue | Implication | Residual risk | Recommendation and management response/ action plan | Responsible officer and implementation date |
|---|---|--|---------------|--|--|
| 7 | The council is reliant upon notifications from external agencies and other service teams to identify those children who have not previously been registered with an education provider. | Without an automatic sharing of data, children's details may not be notified. The council may not identify all children who are missing education. | Medium | Consideration should be given to becoming more pro-active in identifying those children who have never been registered with an education provider. This could include the establishment of formal information sharing agreements with key agencies. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and Head of Development & Innovation |
| 8 | The EHE service does not have formal contingency arrangements in the event of unforeseen absences of key members of staff. | Delays may occur in contacting families and assessing the suitability of education provision. | Medium | We recommend that: a) in the event of unforeseen absences of EHE support officers appropriate action should be taken to ensure that prompt visits/ assessments of newly referred cases can continue to be undertaken; and b) management should monitor the time taken to perform initial assessments, follow-up visits and issue reports to enable service delivery to be improved. Management response: Agreed in principle. To be taken forward by the new strategic lead in 2011. | Head of Quality & Continuous Improvement and LEIS Senior Manager |

Risk and Control Evaluation (RACE)

Appendix B

| RACE - Elective Home Education | | | | | | | | | |
|-------------------------------------|---|---|---|--|---|---|------------|----------|-----------------|
| Risk Control Evaluation | | Risk 1 | Risk 2 | Risk 3 | Risk 4 | Risk 5 | Test (Y/N) | Test ref | Test conclusion |
| | | The council do not identify those children not registered at mainstream schools (or other education providers). | Council guidelines do not consider continuously changing statutory obligations. | Inappropriate assessments do not adequately evaluate the family situation and the child does not receive the appropriate level of education. | There is no strategic lead for the service to ensure appropriate ownership. | The EHE team does not comprehensively assess all the children missing from education. | | | |
| High Level Controls | | | | | | | | | |
| C1 | M | The council has established formal procedures for the identification of children who are not receiving a suitable education or are missing education. | √ | | | | Y | T1 | ✓ |
| C2 | M | The council's policies are clear, transparent and easily accessible to staff and parents. | | √ | | | Y | T1 | ✓ |
| C3 | M | The council has a named senior officer who is responsible for elective home education policy and procedures. | | √ | √ | | Y | T1 | ✓ |
| C4 | M | The council complies with statutory guidance when undertaking assessments and evaluating the level of education which is being provided. | | | √ | √ | Y | T1 | ✓ |
| Preventative Controls | | | | | | | | | |
| C5 | M | All officers who have contact with home educating families have received appropriate training and (including safeguarding) are familiar with home education law, policies and procedures. | √ | √ | √ | √ | Y | T2 | ✓ |
| C6 | M | The council's policies relating to elective home education are reviewed on a regular basis to ensure that they reflect current law and are compatible with guidelines. | | √ | | | Y | T1 | ✓ |
| C7 | M | The EHE team and the CME team liaise and share information of the pupils that they are aware of, where appropriate. | √ | √ | √ | √ | Y | T5 | ✓ |
| C8 | M | Where potential safeguarding concerns are evident or identified, there are formal procedures in place within the council to ensure that child protection arrangements are followed. | √ | √ | | | Y | T2 | ✓ |
| Detective Controls | | | | | | | | | |
| C9 | C | The council has a formal registration process for home educated children which is reviewed annually. | √ | | | | Y | T3 | ✓ |
| C10 | C | All home educated children are monitored by the local authority. A database of home educated children is maintained. | √ | √ | √ | √ | Y | T3 | ✓ |
| C11 | C | Where children are registered for the first time a visit is undertaken by the appropriate local authority officer. All children are contacted at least annually. | √ | | √ | √ | Y | T3 | ✓ |
| C12 | C | The council undertakes an analysis of the reasons why parents or carers choose to home educate the children/ young people. | | √ | √ | | Y | T3 | ✓ |
| C13 | C | Formal records of visits to those children/ young people who are home educated are maintained by the local authority. | √ | | √ | √ | Y | T3 | ✓ |
| C14 | M | Formal minutes are available of service team meetings and the service is represented at an appropriate level within the organisation. | | | | √ | Y | T4 | ✓ |
| C15 | | Reports relating to EHE are produced and are made available to key managers. | | | | √ | Y | T4 | ✓ |
| C16 | M | Where the EHE team have concerns or are unable to gain access to known children, formal referrals are made to the CME team and/ or the appropriate service team. | | | √ | | Y | T5 | ✓ |
| Adequacy of current controls | | | ✓ | ✓ | ✓ | ✓ | | | |
| Recommended Controls | | | | | | | | | |
| R | | The council should undertake a full review of available pupil data, including mainstream primary school data, primary school short stay school data, LEMS, CAMHS and special schools. | | | | √ | | | |
| R | | the service should be fully integrated into the appropriate group of the CYP directorate as soon as possible in order that appropriate ownership of the service can be achieved. Governance and reporting arrangements should be clarified. | | | | √ | | | |
| Adequacy of future controls | | | ✓ | ✓ | ✓ | ✓ | | | |