



Rhwydwaith
CYMUNEDAU MWY DIOGEL CYMRU
WALES SAFER COMMUNITIES
Network

Belonging, engaging and participating

Consultation response form

Your name: Sarah Capstick

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Responses should be returned by 20 July 2023 to:

Supporting Achievement and Safeguarding
Equity in Education Division
The Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

email: ccd.sas@gov.wales



Question 1 – Does the draft ‘Belonging, engaging and participating’ guidance provide suitable useful, practical information for leaders, teachers and other practitioners in schools, pupil referral units and education otherwise than at school settings to enable schools and governing bodies to improve learner engagement and attendance?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments

The Wales Safer Communities Network does not have the relevant practical educational experience to provide an opinion on this on behalf of education practitioners.

Question 2 – Does the draft ‘Belonging, engaging and participating’ guidance clearly set out the legal responsibility of the school and governors?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

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Question 3 – Does the draft ‘Belonging, engaging and participating’ guidance clearly set out the responsibilities of the local authority?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

The concern from community safety is the number of children and young people who following Covid may not have returned to formal education and are now being educated at home but are not being captured and potentially falling through the cracks which could make them more vulnerable to safeguarding implications such as child abuse, contextual safeguarding and exploitation by individuals or by criminal gangs.



Question 4 – Are the contributing factors and the many possible reasons for absence adequately covered?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

Whilst all the main contributing factors are listed there may also be engagement with the family courts and not just the criminal justice system, there may be some who are on the edge of the criminal justice system who are working with the youth offending services to prevent them from entering the system. Hospitalisation either of the child or a significant other – parent, grandparent or sibling which could be as part of being a young carer or separate.

Sexual harassment is missing from the list of reasons for absence, it is reported that [41% of UK girls aged 14 to 17](#) experience sexual violence and there are other reports about the high numbers that experience harassment linked to their sexuality from being wolf-whistled at to up-skirting and other forms of harassment.

There may also be a socio-economic cause which is caused by poverty or the risk of homelessness or if they are sofa-surfing so not in the homeless system. This may be caused by school uniform concerns as correct items cannot be afforded; an increase in the use of IT may be out of their reach, such as homework having to be printed out and filled in which puts those without printers at a disadvantage; cost of school excursions, trips and holidays which are outside of the families capabilities.

There are also those who may be going through the care system ahead of a special guardianship order, longer term fostering or adoption where the concern about what is happening and where they will end up may lead to some absenteeism.

Question 5 – Are learners with protected characteristics included?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments

We are concerned that 'bullying or discrimination' is being used to cover equalities around gender, race, disability, and sexual orientation which would suggest these things only happen in school, where reality is that they can happen anywhere and could impact on a child or young persons willingness to engage with education and other services.



Question 6 – Does the draft ‘Belonging, engaging and participating’ guidance provide sufficient information for parents and carers to understand their statutory responsibility for ensuring that their compulsory school-age children receive full-time education?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

Whilst the information appears clear to professionals involved in the Wales Safer Communities Network there may need to be a plain language or at least shorter version which is accessible for all parents. We are concerned that we are being told anecdotally that the behaviour of some children and young people has deteriorated following the Covid restrictions resulting in an increase in child to parent violence (frequently referred to as Adolescent to Parent Violence, but there is some information on the violence occurring at younger ages).

Question 7 – Is the draft ‘Belonging, engaging and participating’ guidance explained clearly? If not, which areas could be improved and why? Are there aspects that you particularly like, and if so, why?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

It would appear that there has been an attempt to keep the language as jargon free as possible. The layout also seems fairly easy to navigate.

Question 8 – Is the draft ‘Belonging, engaging and participating’ guidance user-friendly? If not, which areas could be improved and why? Are there aspects that you particularly like and if so, why?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

We agree that it is user-friendly but with an understanding that it is long and there is a lot of information and it might be better to split it into a series of shorter documents which focus on: education settings; parents with children in school; and those outside of the formal education system (such as home schooling); and those for whom



additional services are needed.

Question 9 – On a scale of 1 to 5 (1 being ‘not at all’ and 5 being ‘very’) how helpful do you find the draft ‘Belonging, engaging and participating’ guidance? Are there improvements you would like to see?

1	<input type="checkbox"/>	2	<input type="checkbox"/>	3	<input type="checkbox"/>	4	<input checked="" type="checkbox"/>	5	<input type="checkbox"/>
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Supporting comments

Given the wide range of topics and areas covered they are more summaries and therefore the detail is held in other places and documents which may make it less accessible for some people. There was lots of information on help but the area of young carers and those for whom exploitation could be a factor seemed to be lacking in information on support and the additional challenges that they may face.

We note that there is a lack of reference to Policing given the role the Schools Community Police Officers play as part of the Wales Police Schools Programme. The Programme is jointly funded by Welsh Government and Policing in Wales and is an important partnership with key elements focused on the issues covered in the guidance and therefore we are of the opinion that the Programme should be clearly referenced within the guidance especially with how closely the overall objectives of both align and the focus on the importance of partnership working.

Question 10 – Does the draft ‘Belonging, engaging and participating’ guidance provide adequate information in relation to:

- i. explaining the principles and approaches that should be adopted in improving learner engagement and attendance?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

Those included appear to be evidence based but it is important to note that there may be more approaches that develop over time especially in response to the impact of Covid where school attendance was not an option.



ii. identifying the contributing factors that may impact on attendance?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

Please see our previous answer to question four.

iii. signposting to further guidance and good practice?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments

The information and signposting within the document appear to be appropriate however it is limited within the known categories and may limit the opportunity to add new good practice which is evidence-based or which is already available but not currently known to this Network or our partners.

iv. recording and analysis of attendance data?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

Though the risk of a child or young person falling down a gap when moving through accommodation changes may need more attention as the cost of living crisis, housing crisis and other socio-economic factors may increase alongside covid related behaviours and changes that may not yet be visible.

v. family engagement and multi-agency support?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments

The information is clear, the concern for our partners is where the family are unable to engage due to other stresses and pressures such as homelessness or being at the risk



of or of not knowing where the next meal comes from, which may reduce the ability for families to engage or for children to engage in the support specifically for them.

vi. formal absence management?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	X
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Supporting comments

The reason we are not sure is because there can be a large range of reasons and the solutions may not be as isolated to education only, but to a more holistic approach which wraps more than just education services around the young person and family. When parents are working two or three jobs then a fixed penalty notice may result in pushing them over the edge into severe poverty where they can no longer make ends meet punishing not just the child who is not engaged but with other children they share a house with.

Question 11 – For statistical purposes, persistent absence has been defined in Wales as being absent for over 20% of half-day school sessions. The Welsh Government proposes that the statistical definition of persistent absence be amended to over 10% of sessions, which is the definition currently in use in England. Do you agree or not with this proposal and why?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	X
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Supporting comments

Whilst this may appear a good change and provide consistency and assist with reducing anti-social behaviour linked to school absences, it may negatively impact on those who have disabilities who may have lower immune systems and therefore experience more absences at home and with hospitalisation. It may also negatively effect young carers especially if it is recorded only on registration directly after lunch when a young carer may still be trying to return having returned home to administer medication, personal care or food for the person or people they care for.

Question 12 – We would like to know your views on the effects that the draft ‘Belonging, engaging and participating’ guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.



What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

We do not currently have any views on this matter in regard to the guidance.

Question 13 – Please also explain how you believe the draft ‘Belonging, engaging and participating’ guidance could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Supporting comments

We do not currently have any views on this matter in regard to the guidance.

Question 14 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Education is important for both community cohesion and for empowering children and young people to meet their potential. However, it should be noted that formal education is not always a pleasant experience for everyone and that may be where more focus needs to be placed. Reducing bullying across all characteristics and differences and being supportive for those carrying additional responsibilities.

The risk of those outside of the school system (due to absence or expulsion) being exploited or abused and being easier targets for organised crime or for behaviour challenges which may be disruptive for other pupils may be their only way of expressing there is something wrong, if it takes a domestic abuse victim on average seven attempts to leave ([Refuge](#)) we can't expect children to open up about it when the parent may still be in denial.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: