

20/07/2023

Platform response to *Belonging, engaging and participating*: Guidance on improving learner engagement and attendance

Summary and Key Points:

The guidance published on *Belonging, engaging and participating* is a very positive contribution to the policy and practice around young people's attendance in educational settings (both in school and other settings), and as an organisation we are pleased to see a wide variety of pressures, as well as different approaches to engaging with young people and their families and/or parental figures referenced or recommended in the guidance.

However, there are some clear and key areas where we would want to see significant changes, and where we believe opportunities have been missed to offer an even more holistic, nuanced view of the reality for young people and their parents or parental figures, particularly around mental health, poverty and other key influences on people's attendance, or other engagement with education.

Our response is focused on two main themed areas that we believe need to be further developed:

- *Reducing shame for parents, parental figures and young people*
- *Creating connection between people and communities*

We have drawn out specifics, asking Welsh Government to:

- Consider removing the use of fixed penalty notices for absences in school;
- Consider updating the guidance on parental contracts to ensure the power imbalance is addressed;
- Consider producing pilot exemplar "vulnerability assessments" to build a more strengths-based approach;

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- Consider updating the guidance so that the approaches suggested for emotional based school avoidance are the default approaches suggested for all absences;
- Continue to develop the No Wrong Door approach, and to engage the third sector in the movement towards a more community-led approach;
- Continue to develop the understanding of trauma-informed approaches across Wales, in particular looking at reducing restrictive practice across the school system.

These points are not exhaustive, and others are included in the detail, but these are our priority points.

About Platform:

Platform was born in 2019 from Gofal, a mental health charity established in Wales in the late 1980s. Through decades of working across housing and mental health, we gained real insight into the reality of mental health in society, the impact of trauma, and the causes of distress. That work led us to change our focus and become Platform, the charity for mental health and social change.

Today we work with over 9,000 people a year. We support people of all ages, across urban and rural communities, in people's homes and alongside other services. Our work spans inpatient settings, crisis services, community wellbeing, supported housing and homelessness, businesses, employment, counselling, schools and youth centres.

Our work with young people has developed hugely in recent years.

Children, Young People and Families Services:

Platform's Children, Young People and Families services are underpinned by relationship-based approaches based on the power of early support that nurtures positive feelings and connection with others, avoids children, young people and families' distress becoming medicalised and enables them to thrive. We understand people's experiences and life circumstances can get in the way of what is considered "good enough" parenting. Our approach is about equipping

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children and families with the skills, knowledge, and belief they can manage their mental health positively and live fulfilled lives.

We take a trauma-informed approach grounded in attachment theory and the power of human connection for healing. We use a compassionate, nurturing approach that helps young people and families make sense of their experiences, understand where they are now and where they would like to be in future. We recognise each person's circumstance is unique to them, and our interventions are based around normalising experiences of distress as part of what has happened to them and the challenges they may be facing in life. We know people experience distress in many forms and may need support to understand their reactions and validation for their feelings and struggles. Supported by in-house Clinical and Assistant Psychologists, our Family Wellbeing Practitioners and Peer Mentors are trained in psychological models, enabling us to implement a trauma recovery approach.

Examples of projects currently delivered include:

- **Platform4YP (13-18yrs):** delivered in Swansea Bay and across Gwent in partnership with S-CAMHS, Schools, Social Services, Families First, and Action for Children. We offer strengths-based early mental health support via one-to-one support, group support, peer mentoring, self-care club, arts-based interventions, events, Wonderfest festival and a CAMHS step-down pilot. Sessions are delivered from our offices, in schools, and community venues. Interventions are based on normalising distress as a response to challenging situations, learning strategies to self-regulate/overcome difficult feelings, and meeting others with shared experiences.
- **The Hangout, Cardiff and Vale Ealy Help Mental Health Hub:** out-of-hours drop-in service for young people (11-18yrs), seven days a week (3pm-9pm) offering one-to-one support, group activities, peer mentoring support and wellbeing programmes, as well as crisis support – available alongside statutory interventions and as an alternative where young people can be assessed by the CAMHS Crisis Team to avoid visits to A&E or waiting for a CAMHS referral.

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- **Platform for Families:** Caerphilly and Neath Port Talbot Families First contracts, offering systemic, whole family support, as well as separate young people and parent wellbeing programmes and resources, counselling, peer support groups and social activities, and online community chat forums/wellbeing resources for families to connect with others and learn strategies to better self-manage in times of crisis.

Platform's understanding of mental health

Platform's *Manifesto for Social Change* sets out the evidence base for an evolution in our understanding of mental health¹. Our mental health is largely determined by the conditions in which we are born, grow, work, live and age along with the wider set of forces shaping the conditions of our daily lives.

Deprivation and injustice are causes of mental illness. When we do not have what we need it puts immense strain on us, our families, and communities. This leads to experiences of injustice, adversity, trauma and despair. This, in turn, leads to neglect, abuse, poor health and lives being cut short.

Stress, trauma, poverty, and violence experienced during the first 1,000 days of an infant's life can have lifelong adverse effects on health and wellbeing. This is because the first 1,000 days are when a child's brain undergoes accelerated growth and development, and when the foundations for their lifelong health are built. How well or how poorly mothers and children are nourished and cared for during this time has a profound impact on a child's ability to grow, learn and thrive. Nearly 4 in 10 Welsh households cannot afford anything beyond essential everyday items. Wales has the highest levels of child poverty in the UK. As people's situations have worsened, anti-depressant prescription rates have increased. It's a steady climb that has been happening in Wales over the past 20 years and includes a 30% rise in anti-depressant use with children.

Whilst the impact on poorer communities is greater, we all suffer from the consequences of disconnection and overwhelm. We've less time and energy to take care of ourselves or be there for the people we love,

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storing up problems for our future generations. The foundations for us to thrive as human beings are safety, purpose, and connection. These aren't just nice words. They mean that as human beings we all need practical things like a sustainable income, decent housing, good nutrition, a healthy environment, thriving culture, equality, local amenities, and transport to make it easier to participate in society and connect with each other. We also need good relationships, and to feel we belong.

This growing understanding of mental health informs our response to this consultation. The impact of intergenerational trauma and the relational needs of young people, needs to be reflected in all that we do across Wales. Our schools and other education settings are a key part of providing healing spaces for young people and their families, and we should resist and remove, wherever possible, the barriers that interfere with this. Young people and their families are impacted by the wider societal inequality, community trauma and system failure that we all experience – and so our response aims to consider those elements too.

Reducing shame for parents, carers and young people

There is a huge amount in this guidance that we were pleased to see, and that the Welsh Government should be very proud of. However, we also feel there are significant missed opportunities that could be seized if we were ambitious to really push forward a trauma informed, relational approach with our young people in education settings which would improve attendance. This needs ambition from Welsh Government, to take a firm stand against actions that will cause harm, or actions that are not fully conducive to a relational and trauma-informed approach. As our NHS becomes under increasing financial pressure there will be a greater need for education settings to be places for healing for children and young people. The evidence base is clear that it is safe secure nurturing relationships from the adults in their lives that help children heal from childhood adversity².

One of the key factors behind young people's disengagement, and in addition, behind mental health, is the presence of shame in the system. Shame has a long-term impact on the mental health of young people:

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“If child experiences shame occasionally, they are able to recover and move on and it doesn’t necessarily have a negative impact, but if they are exposed to regular experiences of shame, they can develop negative coping mechanisms which can cause significant toxic stress, and have a lasting impact on their relationships, emotions, behaviour and learning.”³

We believe that the critical ambition of this guidance must be to reduce shame for parents, parental figures and young people themselves. Across the mental health system both for young people and adults, we see people saturated with shame and that leads to further disconnection and dysregulation, which in turn perpetuates more and more the intergenerational cycle of recrimination, shame and harm. The antidote to this is safe secure and nurturing relationships in a system that is based on supporting agency, security, connection and trust across its policies, practice and managerial systems too.

It is in this context that we suggest that this guidance explicitly rules out the use of fixed penalty notices. The evidence as to the effectiveness of this tool to reduce absence is limited, with a 2019 evaluation of FPNs finding “no evidence of a relationship between changing levels of authorised, unauthorised and overall absence” and FPNs, and identifying that although 56% of local authority and school interviewees suggested FPNs were effective, 37% did not.⁴ For those that the intervention is going to have an impact on (those with stretched income), the fear and shame created by the potential use of this instrument vastly outweigh the benefits. For those that this does not have an impact on (those with income who will make a calculation about savings versus cost, particularly around term-time holidays), it has almost zero impact. We recognise that local authorities and schools can find this a helpful tool to manage attendance by having the ability to escalate, but the evidence around the impact of shaming actions on young people and their families should make this a legacy of a coercive past. Instead, focusing more on the work espoused by the Whole Schools approach, and the approach to emotional based school avoidance (EBSA), which are already included in the guidance, is more likely to be fruitful.

When we asked the young people we work with, support was mentioned as being an important reason why they are motivated to go to school, as

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well as “getting good grades”. The overwhelming response from our focus group was that they struggle to attend school due to bullying, contradictions (lack of support), the lack of flexibility around time it starts, and the lack of choice in lessons. We recognise changing some of these elements are outside the scope of this guidance, but it is striking that almost none of the young people we work with mentioned fixed penalty notices.

One person however, did talk about themselves being motivated to go to school to avoid fines for their parents – and we believe this is another example of a shaming impact. We should be making our schools safe and welcoming places not places that young people are forced to go, because they are shouldering the financial burdens we are imposing on their parents.

On a similar basis, we would question the use of parenting contracts as they are outlined in the guidance. There is a contradiction in the document, where it states that “entering into a parenting contract is voluntary for both parties”, but then also continues that “if a parent refuses or fails to meet the requirements, alternative courses of action, including statutory interventions and sanctions will need to be considered”. It is very important, when people in positions of authority and power are working with parents who are likely themselves to have experience exclusions and truancy, that the agency and free choice of people is respected. It is difficult to achieve voluntary engagement when there is an enforcement-led response held over parents. This part of the guidance does prioritise the powers of the school and other relevant professionals over the rights of parents to expect a trauma-informed response. This should be changed.

At its basic level, we would want the use of parenting contracts to be removed, but if that is not possible, we would encourage a shift in wording on page 45 to:

“If a parent refuses to engage with the contract **after having agreed to participate, and if the professionals have made every effort to work in a positive, relational way**, then alternative courses of action, including statutory interventions and sanctions **may** need to be considered.”

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This should be done alongside a conversation to explore what the ‘refusal to engage’ is about. Taking a trauma informed approach, it should be explored with the parents what their unmet needs are, what are the things that will help them and what else is going on around them that is getting in the way. It is not uncommon that those parents struggling to ‘engage’ have multiple other adverse life experiences happening for them and that they are not in overwhelm or struggling with the impact of trauma and adversity themselves.

If the use of parenting contracts is not removed, we would also recommend the inclusion of exemplar contracts that are built on a trauma informed positive behavioural support approach, prioritising relational aspects to build safety and connection for young people and their families.⁵

We are also concerned that the guidance does not fully articulate the potential distress and trauma that many parents of young people struggling to participate school, experience. Whilst this is captured to some extent by the focus on the Whole School approach, this guidance reads as if it is in two parts: a supportive and trauma-informed response, and then a coercive, shame-based systemic response. This is not how being trauma informed works. We understand that for some professionals, this might be seen as the need for a system with escalation potential, but our view is that the presence of a coercive response undermines the opportunities for parents to participate with the system from the start and does not fully understand what it means to be trauma informed or responsive. Actions that are based on humiliation, shame, isolation, loneliness, fear or powerlessness lead to poor mental health and cause distress. The use of these approaches to ‘manage behaviour’ are thought not to be trauma informed. Instead, approaches that foster agency, security, connection, meaning and trust are trauma informed and responsive. This approach puts at the heart the question ‘what has happened to you and what are you not getting that you need’ rather than ‘what is wrong with you’.

The blueprint of an approach that encompasses family participation, trauma and other challenges already exists within the guidance – on page 38, in the section “Support for Emotionally Based School Avoidance”.

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Whilst not perfect, this section is much more trauma-informed, and there is no reason at all why this approach cannot, or should not, be adopted for all young people finding it hard to take part in school. We understand that this may place resource pressures on schools, but it is hugely important that we have a realistic understanding of what is needed to create supportive, trauma-informed school environments.

Offering a relational approach to a specific sub-set of young people and their families, whilst in the same guidance suggesting the use of fixed penalty notices and parental contracts, is contradictory and flawed. All young people who are struggling to participate in schooling should have the approach to EBSA applied to them as routine practice. This should be the core of the guidance, as the whole approach will help to reduce shame, and will enable professionals to approach parents in a similar and consistent way.

In terms of family engagement and multi-agency support (page 39), we wanted to draw attention to work undertaken by Save the Children, in partnership with Platform, which works to include everyone who is involved with bringing up children within the Bettws ELC; this includes families, communities, the local council, Flying Start, housing associations, schools and teachers, health visitors and GPs, and local, voluntary and community groups.

In practice, the Bettws ELC works together to design and test new ways of working to:

- support children as they start school
- improve play and learning at home and in the community
- increase emotional wellbeing and resilience
- address poverty and meet material needs

This includes working to develop trauma-informed services and increase family emotional wellbeing and resilience. The Bettws ELC approach builds on developing practice in Wales, particularly in a number of Families First programmes in the same area which integrate applied psychologists into their practice models. In Bettws ELC, this approach is taken a step further by creating space that draws together not

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only Families First and mental health colleagues but other crucial players such as the local schools, housing associations, local policing, health visitors, Flying Start workers, and other relevant stakeholders who have influence over the conditions in which children, families and local residents live. There is more information available in the *Trauma Informed Communities* report from the ACE Hub.⁶

We are concerned about the reference on page 35, to it being compulsory for schools to request parents/carers to attend reintegration interviews following fixed term exclusions. We have assumed that this would not overrule guidance and law around safeguarding (which may need to be made explicit), but we would also suggest that this is amended so that it reflects the trust we need to have in our schools. We would suggest this is amended to:

“...compulsory to request parents/carers to attend reintegration interviews following fixed term exclusions, **providing that pastoral teams are satisfied it will not be harming relationships or safety at home.**”

We would also like to point out the links between how ‘behaviour’ is managed in schools and the links between school attendance. The Welsh government reducing restrictive practice document outlines how education settings can better support children and young people with behaviours of distress.⁷ Applying these least restrictive principles to this guidance would address many of the issues we have highlighted about. The practices described above are not least restrictive and do not apply the principles of positive behavioural support. Challenging behaviour and trauma are associated. Young people who show challenging behaviour are more likely than average to have been exposed to trauma. In some cases, challenging behaviour is a symptom of trauma.

Young people who have experienced trauma in the past are especially at risk of experiencing psychological harm from restrictive interventions. The same can be said for their parents subject to punitive practice from schools. For example, exclusion and seclusion can echo relational trauma and systemic trauma, while physical restraint can echo physical and sexual abuse. As a result, these interventions may cause harm and potentially drive even more challenging behaviour.

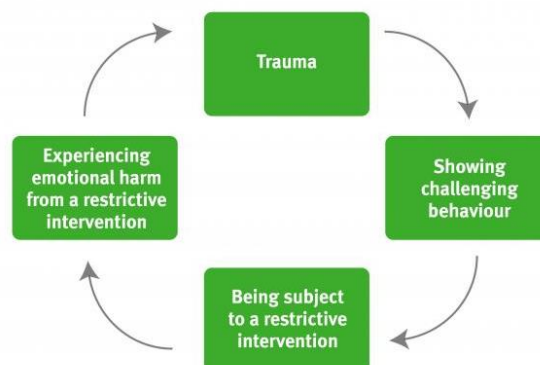
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Positive behavioural support (PBS) may reduce the use of restrictive interventions. However, it does not go the whole way in addressing the wider system which is why we welcome the whole school approach. PBS will support the young person to manage their behaviour but does not necessarily do anything about external circumstances that may be causing the behaviour.

Trauma-informed schools, in contrast, seek to minimise the trauma-causing potential of the school environment. One aspect of this is using less emotionally harmful alternatives to restrictive interventions. A trauma-informed school also seeks to maximise the healing potential of the school environment. One way of doing this is through teaching young people about mental wellbeing. Another way is by creating a positive ethos, providing young people with a direct experience of reliable attachment figures and a safe and caring environment.

However, we are hearing from parents we work with, that many high schools use the punitive approach called Ready to Learn. Punitive and restrictive practice is harmful to children and young people, and we have seen it be a cause of children and young people not wanting to attend school, as well as running away and going missing from school. This experience can be highly shaming for children and young people.

Trauma, challenging behaviour and restrictive interventions



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Figure one: Trauma and behaviours of distress/that challenge us cycle

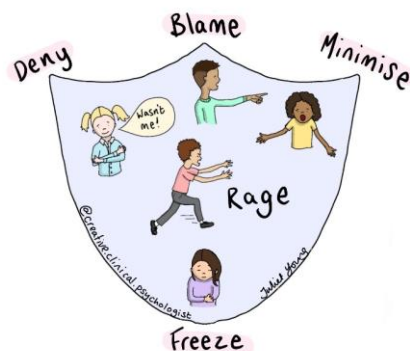
Shame is the fear of disconnection, of not living up to what is expected and then being rejected. Of not belonging. We are physically, emotionally, and cognitively hard-wired for connection, love, and belonging. Shame is a deeply social response, and it is traumatic. It is the intensely painful feeling or experience of believing that we are flawed and therefore unworthy of love, belonging, and connection (Brown, 2022). Our emotional pain runs on almost the identical pathways as physical pain (Robert, 2020). Shame is highly correlated with addiction, depression, violence, bullying, and eating disorders.

Moving from shame to guilt is a key child development stage in our early years. We are learning about these emotions when we are about 1-5 years old (Erikson, 1956). If we receive safe and secure nurturing relationships, we learn to move from “I am bad” to “I did something bad”. Shame and guilt are learned within our social environment through observation, modelling, and verbal transmission (Eisenberg, 2000). If we are not given appropriate opportunity to learn these key emotions, there is a cost to our relational and mental health longer term including our ability to regulate and manage our emotions, stay out of ‘fight’ as a response and how we feel about ourselves alongside how we respond within our relationships with others. We should consider how shame responses play out both for children and young people but also in the approaches suggested for responding to parents’ behaviour too. After all, all behaviour is communication.

The Shield of Shame

(adapted from Golding and Hughes, 2012)

Shame can be such a painful emotion to feel that we often respond in ways that end pushing people away (at a time when connection is really needed)



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We also have concerns around the use of the word “resilience” on page 33. It is important to recognise that some perspectives on resilience are as a concept that harden or inure our young people to external impacts and make them better at surviving trauma or difficulty rather than recognising there are wider societal dynamics at play that we have a duty as a society to address. Resilience comes from having our relational and physical needs met by those around us. It is not a DIY project. Instead, we would suggest the following:

“Supporting learners’ wellbeing and mental health also involves supporting them to develop **positive relationships and connections to people, interests and places that will help them heal from challenge and adversity and adapt to change.”**

On page 32, there is reference to a “vulnerability assessment profile”. This is positive in that it will allow schools to be aware of people who might be more at risk but it is incredibly important that the practice around these assessments is strengths-based as well, which will enable young people to find and develop those positive connections that will insulate and protect from future hardship. We would suggest that an exemplar of a strengths-based vulnerability assessment profile is co-produced with young people and other organisations, included in the guidance, and piloted across schools.

Creating connection between people and communities

Earlier in our response we described the guidance as one of two parts, a focus on coercive, and a community-based, trauma-informed part. We are pleased to see so many references to community, an understanding of trauma, and other aspects, captured in this guidance. This is a springboard for education settings to meet the needs of young people by harnessing community and individual resources, building connection for young people and their families, and acting as a secure base from where people can explore their identity, interests and idea in a modern world. This element of the guidance is exciting, and we are looking forward to seeing how schools will implement and embed these ideas.

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At the outset, there is a clear acknowledgement that young people and their families will be experiencing a wide range of possible reasons for absence. This is a welcome part of the guidance. The main tweak we would make to this list (page 11), is the addition of LGBTQ+ identity, and potentially another around protected characteristics. Whilst of course this is covered by the language “including but not limited to”, we believe it is important that this guidance recognises the myriad impacts that young peoples’ identities can have on their experience of school settings and will offer schools more clarity that they should consider the impacts of (society’s reaction to) LGBTQ+ identity and other protected characteristics on young people. We are pleased that this already included “children who are looked after”, but we would also extend that to care experienced children and young people too (who may no longer be within that system, but still carry the experiences that came with that).

We fully embrace the principles on page 12, especially the stated focus on positive relationships. It is this focus that drives Platform and has guided our response throughout. The need to repair, build or maintain relationships with young people and their families despite the impact of intergenerational trauma and inequality. The principle of building positive relationships is seen strongly in the learner-centred approach, prioritising inclusion, learning opportunities and support. This is a welcome change to the experiences of some of our most marginalised young people, and if adopted widely across Wales will make a significant positive impact.

We welcome the further development of a whole school approach in this context and we would only repeat our concerns elsewhere in the document about the impact of escalatory procedures, which are referenced on page 14/15, and there is a risk that by building in the ability to escalate in this way, that the shaming and blaming approaches that cause significant harm to young people and families may be locked into our systems.

Schools work at their best when they are linked to, and part of, their communities. The Platform manifesto draws out the clear impact of community poverty and trauma on people’s mental health, and ongoing work considering Adverse Community Experiences⁸, for example, demonstrates that these experiences can cluster – whilst also demonstrating that for many communities, big events (Grenfell, Aberfan,

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loss of industry in South Wales Valleys) can have huge impacts for generations. In these spaces, often the local schools are some of the few resources left for the community, and it is critical that schools are connected to services and resources that are not just statutory. For example, we reference the Bettws Early Learning Community above, which would not have been possible without the local school's engagement, and the positive influence this had on young parents and their children is significant.

However, we also recognise that for schools struggling with budgets and with time out of the classroom. There needs to be additional support and links made across the Welsh public and third sector, to connect teachers, support staff, young people and families more widely. By making the school a place where local people can hold meetings, where charities and groups can meet or work from, the school physical environment can be seen as a community hub, both in and out of hours. This is an area where the guidance is strong, with reference to Family Engagement in Community Focused schools' guidance set by Welsh Government.

However, we do feel that this could be made more robust – we would want there to be an expectation for schools to develop this approach more widely, with partnership pilots across the third sector through WCVA and other CVCs to explore resources needed, as well as alongside the WLGA and local authorities. A shift to a school as the hub of the community should not be left to inspirational and individual leaders or creative schools – it should become the default, but this cannot be delivered by the education sector alone and needs partnership working across Welsh Government and beyond. In this area, we would also raise awareness of the work by the Children's Commissioner for Wales, *No Wrong Door*⁹, which we know has been welcomed by the Welsh Government, Embedding this approach as widely as we can, and including awareness and understanding of the approach across schools and their surrounding communities, will be vital.

This approach was adopted successfully within Hywel Dda Health Board, where Plattform worked alongside local schools to deliver wellbeing, mindfulness and regulation techniques to teachers to help them support pupil wellbeing within the classroom. We can provide more information about this work on request.

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Voices of young people

We held a focus group with young people we work with, through our Power Up project, and some of those views have been captured above, but there are additional responses we wanted to showcase as being important contributions to this guidance. The overwhelming impression we had from young people was the need for flexibility, understanding, and consistency. Consistency in terms of values: good support, school staff that listen and care, and openness about consequences and accountability. Flexibility in terms of lesson times, lesson content, the needs of individual students especially those on reduced timetables, and if necessary, more flexibility on fixed penalty noticed. And understanding: not dismissing concerns as 'girl drama', as one young person fed back to us, not always involving parents as home life is not always fully secure or safe – wanting a barrier between home and school, a lot of the time. We would be happy to approach our young people to see if they would like to share more of these thoughts with the team drafting the guidance, but this is a flavour of their contributions.

Conclusion

There is a great deal to be excited and pleased about in this guidance – the focus on community, the recognition of a wide mix of needs amongst young people and families, and the clear adoption of Whole Schools approaches, are all to be welcomed, and we applaud Welsh Government and stakeholders for driving forward this vital development in our schools system.

However, we remain deeply concerned that an opportunity to remove or reduce coercive, traumatic and shame-inducing tools has not been used. This is made more frustrating because there are sections of the guidance around emotional-based school avoidance (EBSA) where the guidance is progressive, trauma-informed, and actively creates an approach that would avoid and reduce shame. We would urge the Welsh Government to rethink these elements of the guidance.

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We do understand and appreciate the overwhelming context that many schools find themselves in: our clear message for those schools and the education sector is that they are not alone. The third sector is ready and willing to help with community connection, and although our own sectors are struggling with financial pressures, we believe that our shared passion for getting it right for young people, and our different expertise and experiences, could be a powerful combination. By this, we do not just mean Platform, but a wide range of third sector organisations, many of whom (but not only those) we work alongside through our Power Up project.

This guidance is so nearly excellent and could be so much more impactful for young people and our schools. This guidance contains a lot of what is needed, it makes a good start in continuing the conversation, but we do not believe it goes far enough at all, to get to grips with the real emotional challenges facing young people and their families and caregivers – and the relational approach needed to be taken across schools and with communities, to address that.

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