

MAT Attendance Policy

Adopted By: Board of Trustees

Date: January 2024

Review Date: January 2025

MAT Attendance Policy

| Date of Issue: | January 2024 |
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| Policy applies to: | All parents, pupils and staff attending schools within the trust. |
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| Policy Version Number: | 1 |
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| Purpose of the document: | To set out clear procedures for encouraging good school attendance. |
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| Summary of the main points: | The document provides: The roles and responsibilities, attendance expectations and procedures. |
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| Approved by: | This policy has been approved by the Wessex MAT Board of Trustees |
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| Reviewer: | Mike Foley |
| Summary of amendments: | |
| Sammary of amenaments. | |
| Next review due: | January 2025 |

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Statement of intent

Wessex Multi-Academy Trust believes that in order to facilitate teaching and learning, good attendance is essential. Pupils cannot achieve their full potential if they do not regularly attend school.

We understand that barriers to attendance are complex, and that some pupils find it harder than others to attend school; therefore, we will continue to prioritise cultivating a safe and supportive environment in our schools, as well as strong and trusting relationships with pupils and parents.

We take a whole-school approach to securing good attendance and recognise the impact that our efforts in other areas – such as the curriculum, behaviour standards, bullying, SEND support, pastoral support, and the effective use of resources such as pupil premium – can have on improving pupil attendance.

We are committed to:

- Promoting and modelling high attendance and its benefits.
- Ensuring equality and fairness for all.
- Ensuring this attendance policy is clear and easily understood by staff, pupils and parents.
- Intervening early and working with other agencies to ensure the health and safety of our pupils.
- Building strong relationships with families to overcome barriers to attendance.
- Working collaboratively with other schools in the area, as well as other agencies.
- Ensuring parents follow the framework set in section 7 of the Education Act 1996, which
 states that the parent of every child of compulsory school age shall cause them to
 receive efficient full-time education suitable to their age, ability and aptitude, and to any
 SEND they may have, either by regular attendance at school or otherwise.
- Regularly monitoring and analysing attendance and absence data to identify pupils or cohorts that require more support.

1. Legal Framework

- 1.1. This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:
 - Education Act 1996
 - Equality Act 2010
 - The Education (Pupil Registration) (England) Regulations 2006 (As amended)
 - The Children (Performances and Activities) (England) Regulations 2014
 - Children and Young Persons Act 1963
 - DfE (2022) 'Working together to improve school attendance'
 - DfE (2023) 'Keeping children safe in education (KCSIE) 2023'
 - DfE (2016) 'Children missing education'
 - DfE (2023) 'Providing remote education'
- 1.2. This policy operates in conjunction with the following policies:
 - Child Protection and Safeguarding Policy
 - Complaints Procedures Policy
 - Behaviour Policy
 - SEND Policy
 - Supporting Pupils with Medical Conditions Policy
 - Pupils with Additional Health Needs Attendance Policy

2. Roles and Responsibilities

- 2.1. The Board of Trustees has overall responsibility for:
 - Monitoring the implementation of this policy and all relevant procedures across the Trust
 - Promoting the importance of good attendance through the Trust's ethos and policies.
 - Regularly reviewing attendance data.
 - Sharing effective practice on attendance management and improvement across the Trust.
 - Ensuring that this policy, as written, does not discriminate on any grounds, including, but not limited to, ethnicity/national origin, culture, religion, gender, disability or sexual orientation.
 - Having regard to KCSIE when making arrangements to safeguard and promote the welfare of children.

2.2. The Local Governing Body has responsibility for:

- Monitoring the implementation of this policy and all relevant procedures across the school.
- Promoting the importance of good attendance through the school's ethos and policies.
- Arranging attendance training for all relevant staff that is appropriate to their role.
- Working with the SLT to set goals for attendance and providing support and challenge around delivery against those goals.
- Regularly reviewing attendance data.
- Sharing effective practice on attendance management and improvement across schools.
- Ensuring that this policy, as written, does not discriminate on any grounds, including, but not limited to, ethnicity/national origin, culture, religion, gender, disability or sexual orientation.
- Handling complaints regarding this policy as outlined in the Trust's Complaints Procedures Policy.
- Having regard to KCSIE when making arrangements to safeguard and promote the welfare of children.

2.3. The headteacher/head of school is responsible for:

- The day-to-day implementation and management of this policy and all relevant procedures across the school.
- Ensuring all parents are aware of the school's attendance expectations and procedures.
- Ensuring that every pupil has access to full-time education and will act as early as possible to address patterns of absence.
- The overall strategic approach to attendance in school.
- Developing a clear vision for improving attendance.

2.4. Staff are responsible for:

- Following this policy and ensuring pupils do so too.
- Ensuring this policy is implemented fairly and consistently.
- Modelling good attendance behaviour.
- Using their professional judgement and knowledge of individual pupils to inform decisions as to whether any welfare concerns should be escalated.
- Where designated, taking the attendance register at the relevant times during the school day.

2.5.

- Monitoring attendance and the impact of interventions.
- Analysing attendance data and identifying areas of intervention and improvement.
- Communicating with pupils and parents with regard to attendance.
- Following up on incidents of persistent poor attendance.
- Informing the LA of any pupil being deleted from the admission and attendance registers.

2.6. Pupils are responsible for:

- Attending their lessons and any agreed activities when at school.
- Arriving punctually to lessons when at school.

2.7. Parents are responsible for:

- Providing accurate and up-to-date contact details.
- Providing the school with more than one emergency contact number.
- Updating the school if their details change.
- The attendance of their children at school.
- Promoting good attendance with their children.

3. **Definitions**

3.1. The following definitions apply for the purposes of this policy:

3.2. Absence:

- Arrival at school after the register has closed
- Not attending school for any reason

3.3. Authorised absence:

- An absence for sickness for which the school has granted leave
- Medical or dental appointments which unavoidably fall during school time, for which the school has granted leave
- Religious or cultural observances for which the school has granted leave
- An absence due to a family emergency

3.4. Unauthorised absence:

- Parents keeping children off school unnecessarily or without reason
- Truancy before or during the school day

- Absences which have never been properly explained
- Arrival at school after the register has closed
- Absence due to shopping, looking after other children or birthdays
- Absence due to day trips and holidays in term-time which have not been agreed
- Leaving school for no reason during the day

3.5. Persistent absence (PA):

• Missing 10 percent or more of schooling across the year for any reason (attendance less than 90%).

3.6. Missing education

 Not registered at a school and not receiving suitable education in a setting other than a school.

4. Attendance expectations

- 4.1. The Trust and its schools have high expectations for pupils' attendance and punctuality and ensure that these expectations are communicated regularly to parents and pupils.
- 4.2. Pupils will be expected to attend school punctually every day they are required to be at school, for the full day.
- 4.3. The school day starts at 8.45am and pupils will be expected to be on the school site by 8.45am, when the doors open. Pupils will have a morning break at 10.50am, which will last until 11.05am, and a lunch break at 12pm, which will last until 1pm pupils will be expected to have returned from each break and be ready to recommence learning at the stated times.
- 4.4. Registers will be taken as follows through the school day:
 - The morning register will be marked by 9am. Pupils will receive a late mark if they are not in their classroom by this time. Pupils attending after this time will receive a mark to show that they were on site, but this will count as a late mark.
 - The morning register will close at 9.30am. Pupils will receive a mark of absence if they do not attend school before this time.
 - The afternoon register will be marked by 1pm. Pupils will receive a late mark if they are not in their classroom by this time.
 - The afternoon register will close at 1.30pm. Pupils will receive a mark of absence if they are not present.

5. Absence Procedures

- 4.5. Parents will be required to contact the school office via telephone or email before 9:00am on the first day of their child's absence they will be expected to provide an explanation for the absence and an estimation of how long the absence will last, e.g. one school day.
- 4.6. Where a pupil is absent, and their parent has not contacted the school by the close of the morning register to report the absence, administrative staff will contact the parent by telephone call as soon as is practicable on the first day that they do not attend school. If a parent cannot be reached by telephone, the school administrative staff will also try to contact the parent by email.
- 4.7. The school will always follow up any absences in order to:
 - Ascertain the reason for the absence.
 - Ensure the proper safeguarding action is being taken.
 - Identify whether the absence is authorised or not.
 - Identify the correct code to use to enter the data onto the school census system.
- 4.8. Where a pupil is absent for more than 3 school days in a row, or more than 10 school days in one term, the pupil's parent will be expected to provide a signed letter with an explanation for the absence(s).
- 4.9. The school will not request medical evidence in most circumstances where a pupil is absent due to illness; however, the school reserves the right to request supporting evidence where there is genuine and reasonable doubt about the authenticity of the illness.
- 4.10. In the case of persistent absences (or when attendance is close to 90%), arrangements will be made for parents to speak to the class teacher in the first instance. The class teacher and parents will discuss the reasons for absences and next steps to improve attendance. The school will inform the LA, on a termly basis of any child missing out on education.
- 4.11. If a pupil's attendance drops below 85 percent, the Head of school will be informed, and a formal meeting will be arranged with the pupil's parent.
- 4.12 Where a pupil has not returned to school for 10 days after an authorised absence or is absent from school without authorisation for 20 consecutive school days, the school will remove the pupil from the admissions register if the school and the LA have failed to

establish the whereabouts of the pupil after making reasonable enquiries.

- 5. Attendance Register
 - 5.1. The school uses SIMS to record and monitor attendance to ensure that attendance can be easily analysed and shared with the appropriate authorities.
 - 5.2. Designated staff members will take the attendance register at the start of each school day and at the start of the afternoon session. This register will record whether pupils are:
 - Present.
 - Absent.
 - Attending an approved educational visit.
 - Unable to attend due to exceptional circumstances.
 - 5.3. The school will use the national attendance codes to ensure attendance and absence are monitored and recorded in a consistent way. The following codes will be used:
 - / = Present in the morning
 - \ = Present in the afternoon
 - L = Late arrival before the register has closed
 - C = Leave of absence granted by the school
 - E = Excluded but no alternative provision made
 - H = Authorised holiday
 - I = Illness
 - M = Medical or dental appointments
 - R = Religious observance
 - B = Off-site education activity
 - G = Unauthorised holiday
 - O = Unauthorised absence
 - U = Arrived after registration closed
 - N = Reason not yet provided
 - X = Not required to be in school
 - T = Gypsy, Roma and Traveller absence
 - V = Educational visit or trip
 - P = Participating in a supervised sporting activity
 - D = Dual registered at another educational establishment
 - Y = Exceptional circumstances
 - Z = Pupil not on admission register

- 5.4. When the school has planned in advance to be fully or partially closed, the code '#' will be used for the relevant pupils who are absent. This code will also be used to record year groups who are not due to attend because the school has set different term dates for different years, e.g. induction days.
- 5.5. Pupils who are absent from school but are receiving remote education for any reason will be marked as absent in the register.
- 5.6. All amendments made to the attendance register will include the original entry, the amended entry, the reason for the amendment, the date of amendment and the name and role of the person who made the amendment.
- 5.7. Every entry received into the attendance register will be preserved for three years.

6. Authorising Parental Absence Requests

6.1. Parents will be required to request certain types of absence in advance. All requests for absence will be handled by the headteacher/head of school – the decision to grant or refuse the request will be at the sole discretion of the headteacher/head of school, taking the best interests of the pupil and the impact on the pupil's education into account. The headteacher/head of school's decision is not subject to appeal; however, the school will be sympathetic to requests for legitimate absence by parents.

6.2. Leave of absence

The school will only grant a pupil a leave of absence in exceptional circumstances. In order to have requests for a leave of absence considered, the school will expect parents to complete a Leave of Absence form at least two weeks prior to the proposed start date of the leave of absence, providing the reason for the proposed absence and the dates during which the absence would be expected to occur. This leave of absence form will also include the child's current attendance (this will be completed by the school).

Any legitimate requests for leave during term time will be considered on an individual basis and the pupil's previous attendance record will be taken into account. Where the absence is granted, the headteacher/head of school will determine the length of time that the pupil can be away from school. The school is not likely to grant leaves of absence for the purposes of family holidays. Requests for leave will not be granted in the following circumstances:

- Immediately before and during statutory assessment periods
- When a pupil's attendance record shows any unauthorised absence
- Where a pupil's authorised absence record is already above 10 percent for any reason (i.e. the child's attendance is already below 90% and deemed persistent absence).

If term-time leave is not granted, taking a pupil out of school will be recorded as an unauthorised absence and may result in sanctions, such as a penalty notice. The school cannot grant leaves of absence retrospectively; therefore, any absences that were not approved by the school in advance will be marked as unauthorised. After a leave of absence form is completed, the headteacher/head of school will meet with the parent to discuss the reason for the leave of absence and whether this has been authorised or will be an unauthorised absence.

6.3. Illness and healthcare appointments

Parents will be expected to make medical or dental appointments outside of school hours wherever possible. Where this is not possible, parents will be expected to obtain approval for their child's absence to attend such appointments as far in advance as is practicable. Parents will be responsible for ensuring their child misses only the amount of time necessary to attend the appointment.

6.4. Performances and activities, including paid work

The school will ensure that all pupils engaging in performances or activities, whether they receive payment or not, which require them to be absent from school, understand that they will be required to obtain a licence from the LA which authorises the absence(s).

Additional arrangements will be made by the school for pupils engaging in performances or activities that require them to be absent from school to ensure they do not fall behind in their education.

The pupil will receive education that, when taken together over the term of the licence, amounts to a minimum of three hours per day that the pupil would be required to attend a school maintained by the LA issuing the licence.

Where a licence has been granted by the LA and it specifies dates of absence, no further authorisation will be needed from the school. Where an application does not specify dates, and it has been approved by the LA, it is at the discretion of the headteacher/head of school to authorise the leave of absence for each day. The headteacher/head of school will not authorise any absences which would mean that a pupil's attendance would fall below 94 percent. Where a licence has not been obtained, the headteacher/head of school will not authorise any absence for a performance or activity.

6.5. Religious observance

Parents will be expected to request absence for religious observance at least two weeks advance. The school will only accept requests from parents for absence on grounds of religious observance for days that are exclusively set apart for religious observance by the relevant religious body. The school will define this as a day where the pupil's parents

would be expected by an established religious body to stay away from their employment to mark the occasion. The school may seek advice from the religious body in question where there is doubt over the request.

6.6. Gypsy, Roma and Traveller absence

Where a pupil's parent belongs to a community covered by this code and is travelling for occupational purposes, the parent will be expected to request a leave of absence for their child at least two weeks in advance. Absences will not be granted for pupils from these communities under this code for reasons other than travel for occupational purposes.

7. SEND and health related absences

- 7.1. The school recognises that pupils with SEND and/or health conditions, including mental health issues, may face greater barriers to attendance than their peers, and will incorporate robust procedures to support pupils who find attending school difficult. In line with the SEND Policy and Supporting Pupils with Medical Conditions Policy, the school will ensure that reasonable adjustments are made for disabled pupils to reduce barriers to attendance, in line with any EHC plans or IHPs that have been implemented. The school will secure additional support from external partners to help bolster attendance where appropriate.
- 7.2. Where the school has concerns that a pupil's non-attendance may be related to mental health issues, parents will be contacted to discuss the issue and whether there are any contributory factors to their child's lack of attendance. Where staff have a mental health concern about a pupil that is also a safeguarding concern, they will inform the DSL and the Child Protection and Safeguarding Policy will be followed. All pupils will be supported with their mental health through support from the class teacher.
- 7.3. If a pupil is unable to attend school for long periods of time due to their health, the school will:
 - Inform the LA if a pupil is likely to be away from the school for more than 15 school days.
 - Help the pupil reintegrate at school when they return.
 - Make sure the pupil is kept informed about school events and clubs.
 - Encourage the pupil to stay in contact with other pupils during their absence.
- 7.4. The school will incorporate an action plan to help any pupils with SEND and/or health issues cope with the stress and anxiety that attending school may cause them. Such plans will be regularly monitored and reviewed until the pupil is attending school as

normal and there has been signs of significant improvement.

- 7.5. To support the attendance of pupils with SEND and/or health issues, the school will consider:
 - Incorporating a pastoral support plan.
 - Consider a reduced timetable.
 - Consider whether a pupil can have somewhere quiet to spend lunch and breaktimes.
 - Consider implementing a system whereby pupils can request to leave a classroom if they feel they need time out.
 - Consider temporary late starts or early finishes.
 - Consider phased returns to school where there has been a long absence.
 - Tailored support to meet their individual needs.
 - Consider a check-in and/or sensory work at the beginning of the school day.

8. Absence in exceptional circumstances

- 8.1. Exceptional circumstances will include when a pupil is unable to attend because:
 - Transport provided by the school, LA or parent is not available and the pupil's home is not within walking distance.
 - There has been widespread disruption to travel services which has prevented the pupil from attending.
 - The pupil is in custody and will be detained for less than four months.
- 8.2. The use of the 'Y' code for exceptional circumstances will be collected in the school census for statistical purposes.

9. Truancy

- 9.1. Truancy will be considered as any absence of part, or all, of one or more days from school, during which the school has not been notified of the cause behind such absence.
- 9.2. All staff will be actively engaged in supporting the regular attendance of pupils, and understand the importance of continuity in each pupil's learning.
- 9.3. Any pupil with permission to leave the school during the day must sign out at the school office and sign back in again on their return.

- 9.4. Immediate action will be taken when there are any concerns that a pupil might be truanting. If truancy is suspected, the headteacher is notified, and they will contact the parent in order to assess the reasons behind the pupil not attending school.
- 9.5. The following procedures will be taken in the event of a truancy:
 - In the first instance, a letter of warning will be sent to the parents of the pupil, informing them of the truancy and stating that any future occurrences could result in further action being taken.
 - If any further truancy occurs, then the school will consider issuing a penalty notice.
 - A penalty notice will be issued where there is overt truancy, inappropriate
 parentally-condoned absence, excessive holidays in term-time and persistent
 late arrival at school.

10. Missing children

- 10.1. Pupils will not be permitted to leave the school premises during the school day unless they have permission from the school.
- 10.2. If the pupil cannot be located on the school site parents will be informed and the police will be notified.

11. Attendance intervention

- 11.1. In order to ensure the school has effective procedures for managing absence, the attendance officer, supported by the SLT, will:
 - Establish a range of evidence-based interventions to address barriers to attendance.
 - Monitor the implementation and quality of escalation procedures and seek robust evidence of the escalation procedures that work.
 - Attend or lead attendance reviews in line with escalation procedures.
 - Produce regular reports with analysis and detailed evaluation of relevant data (see monitoring and analysis of evidence).
- 11.2. The school will use attendance data, in line with the 'Monitoring and analysing absence' section of this policy, to develop specific strategies to improve attendance where patterns of absence are emerging. These strategies will be developed on a case-by-case basis, and will consider the particular needs of the pupils whom the

intervention is designed to target.

12. Working with parents to improve attendance

- 12.1. The school believes that working together with families is the key to improving attendance. The school aims to keep parents well informed on the child's attendance through regular attendance letters to all parents. Parents will be given information on the importance of attendance and the impact of poor attendance on pupils.
- 12.2. The school will work to cultivate strong, respectful relationships with parents and families to ensure their trust and engagement. Open and honest communication will be maintained with pupils and their families about the expectations of school life, attendance and performance so that they understand what to expect and what is expected of them. The school will liaise with other agencies working with pupils and their families to support attendance.
- 12.3. The school will ensure that there are emergency contact details for each pupil wherever possible to ensure the school has additional options for getting in touch with adults responsible for a pupil where the pupil is absent without notification or authorisation.
- 12.4. The school will ensure that parents are aware of their legal duty to ensure that their child attends school regularly and to facilitate their child's legal right to a full-time education parents will be made aware that this means their child must attend school every day that it is open, save for in certain circumstances, e.g. sickness or absences that have been authorised by the headteacher/head of school in advance. The school will regularly inform parents about their child's levels of attendance, absence and punctuality, and will ensure that parents are aware of the benefits that regular attendance at school can have for their child educationally, socially and developmentally.
- 12.5. If a pattern of absence becomes problematic, the school will work collaboratively with the pupil and their parents to improve attendance by addressing the specific barriers that prevent the pupil from being able to attend school regularly. The school will always take into consideration the sensitivity of some of the reasons for pupil absence and will approach families to offer support rather than punitive approaches.
- 12.6. Where these barriers are related to the pupil's experience in school, the headteacher/head of school/head of school and any relevant school staff, e.g. the DSL and SENCO, will work together to address this. Where the barriers are outside

of the school's control, e.g. they are related to issues within the pupil's family, the Head of school will liaise with any relevant external agencies or authorities, e.g. children's social care or the LA, and will encourage parents to access support that they may need.

13. Persistent absence (PA)

- 13.1. There are various groups of pupils who may be vulnerable to high absence and PA, such as:
 - Children in need
 - LAC
 - Young carers
 - Pupils who are eligible for FSM
 - Pupils with EAL
 - Pupils with SEND
 - Pupils who have faced bullying and/or discrimination
- 13.2. The school will use a number of methods to help support pupils at risk of persistent absence to attend school. These include:
 - Meeting with pupils to discuss patterns of absence, barriers to attendance, and any other problems they may be having.
 - Establishing plans to remove barriers and provide additional support.
 - Having regular check-ins to review progress and the impact of support.
 - Making regular contact with families to discuss progress.
 - Assessing whether an EHC plan or IHP may be appropriate.
 - Considering what support for re-engagement might be needed, including for vulnerable groups.
 - Specific support from the school ELSA or Trauma Informed Schools Practitioner
 - Working with staff, parents and pupils on the specific reasons for emotionally based school avoidance.
- 13.3. Where a pupil at risk of persistent absence is also at increased risk of harm, the school will work in conjunction with all relevant authorities, e.g. social services, to support the pupil in line with the school's duty of care. The school will also bear in mind that the continuation of severe persistent absence following intervention may, in itself, constitute neglect, and will escalate any concerns in this regard in line with the Child Protection and Safeguarding Policy.

14. Legal intervention

- 14.1. The school will allow sufficient time for attendance interventions and engagement strategies to improve pupils' attendance; however, where engagement strategies to improve attendance have not had the desired effect, the Head of school will consider:
 - Holding a formal meeting with parents and a representative from the LA.
 - Working with the LA to put a parenting contract or an education supervision order in place.
 - Engaging children's social care where there are safeguarding concerns.

15. Monitoring and analysing absence

- 15.1. The school will monitor and analyse attendance data regularly to ensure that intervention is delivered quickly to address habitual absence at the first signs.
- 15.2. The school will collect data regarding punctuality and authorised and unauthorised absence, for:
 - The school cohort as a whole.
 - Individual year groups.
 - Individual pupils.
 - Demographic groups, e.g. pupils from different ethnic groups or economic backgrounds.
 - Other groups of pupils, e.g. pupils with SEND, LAC and pupils eligible for FSM.
 - Pupils at risk of persistent absence.
- 15.3. The attendance officer will conduct a thorough analysis of the above data on a regular basis to identify patterns and trends. This will include identifying, for each group:
 - Patterns in uses of certain codes.
 - Particular days of poor attendance.
 - Historic trends of attendance and absence.
 - Barriers to attendance.
- 15.4. The attendance officer will provide regular reports to staff across the school to enable them to track the attendance of pupils and to implement attendance procedures. The attendance officer will also be responsible for monitoring how attendance data changes in response to any interventions implemented to increase

- attendance in future.
- 15.5. The governing board will regularly review attendance data, including examinations of recent and historic trends, and will support the headteacher/head of school in setting goals and prioritising areas of focus for attendance support based on this data.
- 15.6. The school will also benchmark its attendance data against local, regional and national-level data to identify areas of success and areas for improvement, and will share practice which has been shown to be effective with other schools.
- 15.7. The board of trustees will ensure staff from different schools within the trust regularly share expertise and collaborate on interventions.

16. Training of staff

- 16.1. The school will recognise that early intervention can prevent poor attendance. As such, staff will receive training in identifying potentially at-risk pupils as part of their induction and refresher training.
- 16.2. The local governing body will ensure that teachers and support staff receive training in line with this policy and that staff will receive regular and ongoing training as part of their development.
- 16.3. Training will cover at least the following:
 - The importance of good attendance
 - That absence is almost invariably a result of wider circumstances
 - The legal requirements on schools, e.g. the keeping of registers
 - The school's strategies and procedures for monitoring and improving attendance
 - The school's procedures for multi-agency working to provide intensive support for pupils who need it
- 16.4. The school will provide dedicated and enhanced attendance training to the attendance officer and other staff with specific attendance functions in their role this will include training regarding interpreting and analysing attendance data and supporting pupils to overcome barriers to attendance.
- 16.5. Staff will receive training to ensure they understand that increased absence from school could indicate a safeguarding concern and know how such concerns should be managed.

17. Monitoring and review

- 17.1. Attendance and punctuality will be monitored throughout the year.
- 17.2. This policy will be reviewed annually by the Board of Trustees. Any changes made to this policy will be communicated to all relevant stakeholders.