London Borough of Waltham Forest Behaviour, Attendance and Children Missing Education (BACME) Service Attendance Protocol 2018-2019

Waltham Forest schools working together to improve attendance and the life chances of our children



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Purpose of this protocol and definitions

- This protocol document provides a framework for continuous improvement in school attendance across all the education settings in Waltham Forest by drawing on skills and experience from schools and partners to improve outcomes for all children. The protocol is intended to empower schools to meet their responsibilities to improve attendance, and to support consistent practice and procedures that can be shared and applied to improve attendance across the borough
- 2. The protocol has been revised in Summer 2018 in response to increasing rates of persistent absence and includes a summary of a borough-wide strategy to reduce persistent absence and improve attendance in the year 2018/2019. The protocol is not exhaustive and recognises that attendance is a very complex and diverse issue and that everyone's circumstances will be different. It incorporates the latest Government guidance, legislation and recommendations.

Definitions

- 3. **School** is used to refer to all maintained schools, academies, free schools, independent schools, special schools, pupil referral units, alternative education provision schools or any DfE recognised provision where a child is registered as their main education base.
- 4. *Parents/carers* is defined in Section 576 of the Education Act 1996 as:
 - All natural parents, whether they are married or not;
 - Any person, who, although not a natural parent has parental responsibility for a child;
 - Any person who has care of a child (having care of a child means that the child lives with and is looked after by that person, irrespective of their relationship).
- 5. *Child* is used in place of pupil, student and young person and refers to any child between the ages of 4 and 18 who is statutorily required to receive education provision. The word also recognises that adolescents are *children first* when it comes to safeguarding their welfare.

Context and principles

6. Waltham Forest Council is committed to working with education partners to achieve excellent levels of attendance for every child in the borough. Underpinning our commitment is the belief that when children attend school regularly and punctually they can take full advantage of the educational opportunities available to them.

Principles

7. The underpinning principles for this protocol are:

Children are safe in school

Giving every child access to full-time education that responds to their needs and abilities Responding to children's needs and providing access to alternative provision if that is required Listening to all children and respecting their experiences as children Collaborating to improve attendance as a safeguarding priority: it's everyone's business Treating everyone with professionalism and with an understanding of equality and diversity Working with providers and admissions so no child is without education for more than 15 school days Committing to the right conversation, and the right action, at the right time Helping children and families to help themselves and each other in their networks and communities Creating consistency in attendance practice across Waltham Forest

National attendance legislation and statutory guidance

- 8. Attendance is recognised as a measure of the quality of the education offered by a school and the national guidance sets that all schools should aim for an attendance target of 100%. Schools should encourage and promote good attendance in as many ways and for as many children as they can, but schools need to balance this with supportive measures that can address the needs of those children who do for whatever reason find it difficult to attend.
- 9. The Department for Education (DfE) updated the statutory guidance on school attendance and parental responsibilityⁱ in January 2015, setting out the responsibilities of local authorities, school leaders, school staff, governing bodies, the police and parents/carers. This statutory guidance forms the core of the Waltham Forest protocol.
- 10. In May 2015, DfE issued guidance on absence statisticsⁱⁱ explaining the changes that would come into effect from September 2015. Persistent absence was redefined as the *proportion of children absent for 10% or more of their possible sessions*. Each school session is one half day following morning and afternoon registration: there are two sessions in a day, and ten sessions in a week.
- 11. DfE provided further non-statutory guidanceⁱⁱⁱ for schools in November 2016 to support consistent practice and maintain high levels of attendance. This guidance clarifies child registration and attendance codes, as well as updating advice on the school day and school year.

The Waltham Forest context

- 12. In 2016/2017, 9.3% of Waltham Forest primary children were persistent absentees, against a London and national average of 8.3%. In Waltham Forest secondary schools, 15.3% of children were persistent absentees, against a London average of 11.9% and a national average of 13.5%. This rate was an increase of 1.6% on the previous year. The rate places us as the highest in London for 2016/2017. The persistent absence rate in primary, secondary and special schools combined in Waltham forest was second highest in London.
- 13. Schools and the local authority have analysed the available performance data, matching it with the School Information Dashboard (SID). In response to the data analysis, the local authority and education partners have devised an action plan to reduce persistent absence, which will aim to:
 - Work with individual schools where absence rates are particularly high;
 - Commit to partnership with parents to improve attendance and reduce absences;
 - Explore together targeted work with particular demographic groups;
 - Prevent children being put on roll if the parent has not agreed or has changed their plans; clarify policy and procedure around admissions and share guidance with all schools;
 - Complete safeguarding checks quickly so schools can off-roll children who are missing from education, such as those who have moved abroad;
 - Look at each of the reasons for absence through analysis of absence codes and put in place strategies to reduce each one;
 - Target children who are on the cusp of PA to prevent them tipping over into the category;
 - Support schools with children who have been consistently absent throughout schooling.
- 14. An advisory group of head teachers has formed to work with the Local Authority to oversee the implementation of the persistent absence action plan. The progress of the action plan will be reported on to the Learning Trust in addition to the Primary and Secondary Challenge groups.

Responsibilities of parents/carers for children's attendance

- 15. Parents/carers are legally required to secure full-time education for children of school age. This can be by attendance at school every day, alternative provision, or otherwise e.g. elective home education. A child who is registered at school must attend every day, and punctually.
- 16. The legal framework for school attendance is set by the Education Acts and associated regulations:
 - Section 7 of the Education Act 1996 states: 'the parent of every child of compulsory school age shall cause him/her to receive efficient, full time education suitable to his/her age, aptitude and ability and to any special educational needs he/she may have either by regular attendance at school or otherwise.'
 - Section 444 further states: 'the parent of a child of compulsory school age registered at school and failing to attend regularly is guilty of an offence punishable in law. Most parents/carers fulfil this responsibility by registering their children at a school.'
- 17. Parents/carers whose children are registered at a school are responsible for ensuring that their children attend every day punctually and that their children stay at school.
- 18. Parents/carers should:
 - ensure that their children arrive at school on time, appropriately dressed and ready to learn;
 - instil in their children an appreciation of the importance of attending school every day;
 - ensure that they are aware of their school's attendance policy (if they have one);
 - impress upon their children the need to observe the school's Code of Conduct;
 - take an active interest in their children's school career, praising and encouraging good work and behaviour and attending parents/carers' evenings and other relevant meetings;
 - work in partnership with their children's school to resolve issues which may lead to lateness or non-attendance;
 - notify their children's school if they are absent. This should be done on the first day of absence. They should also provide an explanation for the absence. This explanation should be confirmed - preferably in writing - when the children return to school;
 - avoid arranging medical/dental appointments during school hours;
 - not book holidays during term time.

Responsibilities of schools for children's attendance

- 19. School responsibilities are set out in the statutory guidance (DfE 2015) and updated in the nonstatutory guidance (DfE 2016).
- 20. The greatest difference to attendance in school can be made by the school itself. The school is expected to have systems in place to alert them to deterioration in attendance or of developing patterns of absence at an early stage. Early intervention can prevent problems from escalating.
- 21. Schools are expected to have their own plan for improving attendance. This should be a whole school approach where there is a designated senior leader with all responsibilities clearly defined.
- 22. In general schools are advised to:
 - Ensure up to date Attendance Policy is in place and this should be reviewed at least annually;

- Ensure attendance practices are understood by all school staff and that attendance practice is followed consistently;
- Appoint an Attendance Lead to deal with all attendance issues including the analysis of data and to carry out daily, post registration truancy checks. Where available, use Lesson Monitor module in SIMS (or similar) to verify that children are in lessons. Target any children that are missing.
- Provide an accurate and consistent registration system;
- Make first day phone contact to all parents/carers whose child is absent without notification;
- Log children's movement in and out of school;
- Ensure that routine letters are sent out at the earliest opportunity following absence. These reflect the importance of attendance;
- Ensure that attendance is a fixed agenda item at the school meetings;
- Ensure that parents/carers are aware of the importance of regular attendance and understand their role and responsibilities in supporting school attendance;
- Access staff training on attendance issues;
- Ensure that systems to track and challenge sporadic absence are thorough, and provide "catch up" opportunities for work missed during absence;
- Provide incentives for good attendance, e.g. league tables, attendance competition;
- Ensure regular emphasis on the connection between attendance and attainment;
- Provide weekly information to parents/carers of children whose attendance deteriorates;
- Provide individual attendance targets for children, getting to 100% wherever possible;
- Provide meetings with parents/carers to address issues and consider use of Parenting Contracts;
- Ensure that patterns of attendance across the form groups are examined by relevant staff;
- Ensure parents/carers are aware of the guidance regarding holidays in term time and of the impact this can have on their child's overall achievement;
- Ensure that staff regularly patrol the school building (in secondary schools, and in primary school where appropriate) and surrounding areas to ensure children are not truanting near to the school;
- Ensure all relevant information re: destinations for children who are de-registered are ascertained from parents/carers prior to de-registration, and shared with BACME in order to ensure that children have continuous access to educational provision. Destinations need to be recorded in the appropriate information system so that admissions/BACME can check that all are accounted for.
- 23. The following is strongly recommended to schools:
 - Produce a policy including early intervention thresholds with a clear escalation process when a trigger point is reached;
 - Identify resources, including human resources to administer and manage the process of managing attendance. Ensure adequate time is allowed to meet the roles in the policy;

- Ensure administrative and support staff have clear responsibilities and procedures to follow to promote and manage attendance. Ensure they have the time and the permission to follow procedures through;
- Agree a sampling period, usually the previous half-term's attendance for each child. On this basis, categorise each child in the school according to school thresholds e.g. 91%-95%; 85%-90%, etc.
- For children whose attendance continues to deteriorate, multi-disciplinary discussion needs to take place with regard to child's needs, barriers to education, work already undertaken and whether there are other appropriate providers that can be considered to enable the child to access appropriate education.
- See Appendix 5 for a list of school role responsibilities.

Attendance registers

The full list of attendance codes can be found in the DfE guidance for schools (See Appendix 6)

24. Schools are required to call attendance registers. Attendance registers are legal documents that may be required as evidence in court cases. Registers must record whether each child is present; attending an educational activity; absent; or unable to attend due to exceptional circumstances. Registers should open and close at regular, set times and this information should be publicised to parents/carers. Registers should be kept in a secure place for a period of not less than 3 years.

Punctuality

25. Schools should take steps to actively encourage excellent levels of punctuality. Lateness should be monitored and followed up. Schools should not keep a register open for the whole session. It is recommended that the register is closed within 30 minutes. Schools can refer to the Behaviour Attendance and Children Missing Education (BACME) Team to issue a Fixed Penalty Notice (FPN) for high number of U marks. Please refer to Appendix 2: FPN Code of Conduct for further information

A Whole School Approach

- 26. A whole school approach to improving attendance means that everyone in the school community this means staff, children, parents/carers, governors and anyone else involved in school has a shared responsibility to promote good attendance. This means that regular engagement and communication about the importance of good attendance is vital to secure improvement.
- 27. School leadership commitment is vital for a whole school approach to be effective, so head teachers and senior leaders will actively support the attendance agenda. It is important that all leaders are committed to creating the conditions where:
 - School is a welcoming environment where learning can take place
 - Children feel happy and safe, and their health and emotional needs are met
 - Parents/carers and children are supported by caring staff.

Authorised absences

- 28. Only a school can authorise an absence. The key points schools should consider when deciding to authorise absence are:
 - it is a legal requirement that registered children of compulsory school age attend regularly and punctually.
 - a satisfactory explanation for every absence is required, if one is not forthcoming the absence should be treated as unauthorised.
 - schools are not obliged to accept a parental explanation for child absence where there is doubt as to the validity of that explanation.

- Parents/carers should be aware that only the Head teacher has the discretion to agree to any leave of absence during term time where there are exceptional circumstances. Each application for leave of absence should be considered in view of the specific circumstances of the family.
- where absence is authorised, schools should remain vigilant to emerging patterns of nonattendance.
- lateness should be actively discouraged, and persistent lateness treated in the same way as irregular attendance.

Unauthorised absences

29. Unauthorised absence is absence without approval from an authorised representative of the school and includes all unexplained absences. If a child is absent with the approval of the school, for whatever reason, no offence is deemed to have been committed. The decision taken by the school to give, or withhold, authorisation for an absence, is a critical factor in determining the Local Authority decision to prosecute parents/carers.

Requests for approved leave of absence

- 30. Amendments to the Child Registration (England) 2006 Regulations state that: "Head teachers may not grant any approved leave of absence during term time unless there are exceptional circumstances. Head teachers should determine the number of school days a child can be away from school if the leave is granted". Before any request for absence is approved, a head teacher must be satisfied that there are "exceptional circumstances" justifying the request.
- 31. The DFE has not defined exceptional circumstances but explains that: "Schools should consider each request individually taking into account the circumstances, such as: the nature of the event for which leave is sought; the frequency of the request; whether the parent/carer gave advance notice; and the child's attainment, attendance and ability to catch up on missed schooling".

Penalty notices for unauthorised absence

32. Parents/carers could be issued with a penalty notice if their child is absent from school without permission. The penalty is £60, per parent, per child, rising to £120 if not paid within 21 days. If parent/carers fail to pay the penalty fine within 28 days they will be prosecuted under Education Act 1996. Please refer to APPENDIX 2 FPN Code of Conduct for further information.

Religious observance

33. Britain is a multi-faith society and sometimes, religious festivals fall outside school holiday periods or weekends and this necessitates consideration of authorised absence or special leave for official religious observance, using Code R. It is reasonable for a parent to allow their children not to attend school on any day of official religious observance as recognised by the parent's religious body. Extended celebration days, which are not part of the official religious observance themselves should not be authorised.

Traveller absence

34. The aim for the attendance of Traveller children, in common with all other children, is to attend school as regularly and as frequently as possible. To protect Traveller parents/carers from unreasonable prosecution for non-attendance, the Education Act 1944, section 86, states that a Traveller parent is safe from prosecution if their child accrues 200 attendances (200 half days) in a year. Traveller absence using Code T is acceptable only when the family is engaged in a trade or business that requires them to travel and when the child is attending school as regularly as that trade permits.

Removal from roll

35. The statutory guidance advises (DfE 2016) that schools must notify the local authority when a pupil's name is to be removed from the admission register at a non-standard transition point, as soon as the ground for removal is met and no later than the time at which the pupil's name is removed from the register. The local authority will also ask for information on children to be removed from roll at

standard transition points so that the record for the child can be closed on the database and also to ensure that children are not missing between primary and secondary.

- 36. Schools must inform BACME Team of any intended deletion from roll. Children should only be removed from the school roll and class registers under the following circumstances:
 - Where a parent informs the school that they are moving out of the area and give a new address and school where they intend to register the child.
 - Where a parent informs a school that they will be pursuing a place in another school in the area the parent will complete the online portal for admissions for an in-year transfer. The school is advised to inform the local authority and where possible the destination school in order to ease transitions for children.
 - Where a parent informs the school in writing that they intend to home educate, the school must inform BACME Team and complete an Elective Home (EHE) referral form.
 - Where a child has been continuously absent for not less than 4 weeks and the school has made extensive enquiries, which have failed to locate the child.
 - Removal of a child from school roll should only be undertaken when authorised by a BACME officer after these enquiries have taken place.
 - Where a child has been granted leave of absence e.g. for a holiday but has failed to attend school within the twenty school days immediately following the expiry of the leave (except by reason of sickness or other unavoidable cause).
 - The school must make a CMfE referral to BACME Team. (See APPENDIX 3)
 - Where a child is registered in accordance with a school attendance order and the Local Authority substitutes another school.
 - Where a child is certified by a Doctor as unlikely to be in a state of health to attend before ceasing to be of compulsory school age.
 - Where the child has died.
 - Where the child has been permanently excluded (See BACME exclusions guidance).

Supporting children when they return from absence

37. Supporting a child after a period of absence requires careful planning. For example, when children are returning after a long period of absence or following a bereavement or specific traumatic event, schools should have agreed procedures which help children return to school. Procedures for dealing with children who return after an absence not only help the child involved, but also reduce disruption to other children.

Children with Special Educational Needs and Disabilities (SEN)

- 38. The school should compile an attendance strategy specific to SEND children, as agreed with governors and parents/carers. This should convey high expectations regarding attendance for all children. There should be a clear reference in the school attendance policy as to how to address the needs of SEND children in relation to attendance.
- 39. Schools should analyse their absence data to identify any areas of concern where there are high levels of absence linked to SEND children.

- 40. Schools should ensure they have strategies in place to address high levels of absence that occur through illness. This should include clear actions to be taken by specific members of staff to work with parents/carers and children where absence through illness appears to be inappropriately high.
- 41. Children with SEND may require a higher proportion of medical appointments due to their needs. Schools should consider ways of making parents/carers, GPs and other health workers aware of the fact that appointments should be out of school time wherever possible.
- 42. Where there are high levels of unauthorised absence for SEND children, schools should work with the local authority to devise a strategy to address this within the school. Actions must be taken at an early stage to prevent SEND children with unauthorised absence from persistent absence.
- 43. Most children in special schools have an Education Health and Care (EHC) plan that must be reviewed at least annually. Mainstream schools also have children with SEND. Attendance should be considered as part of the annual review process as well as on an ongoing basis.
- 44. Schools should view poor attendance as a possible sign of children's frustration at not having their SEND needs met, or feeling that they are not making, good progress. When undertaking a review and when plans are being made for the child, the school, parent or carer and, where appropriate, the child, should consider the impact on progress and the actions needed to improve attendance.

Responsibilities of the Local Authority

45. Waltham Forest is committed to working with schools and other partners to improve school attendance and punctuality and reduce persistent absence. The Behaviour Attendance and Children Missing Education (BACME) service leads on the area of attendance for Waltham Forest.

46. In Waltham Forest, the BACME service aims to:

- ensure that educational opportunities for all children in the borough who are of statutory school age are maximised by means of regular school attendance;
- support schools operationally by receiving individual referrals, and strategically by using and evaluating data to target resources, and to advise on legislation and regulations;
- provide clear, consistent and timely support to schools by the appropriate use of legal action as set out in the statutory guidance.
- have in place processes that are fair, consistent and rigorously applied with an appropriate and effective combination of support and sanctions for those parents/carers who need it.
- work with professionals and agencies to ensure children attend their allocated educational provision, or that provision is identified for individual children resident in the borough who are not in receipt of full time education;
- work with statutory agencies such as the Police, Social Care, Health and Housing to ensure the welfare of all children resident in the borough, in accordance with all relevant legislation;
- work with schools on whole school approaches to improve attendance through policy development, review of systems and developing improvement plans. This will be facilitated by the Behaviour and Attendance Partnership (BAP) forums;
- work with other service providers to provide co-ordinated support to schools and children and disseminate good practice.
- 47. The BACME service provides a traded offer of services that schools may purchase to support good attendance (See APPENDIX 1).
- 48. Those schools that do not buy the traded offer will receive a standard package, which includes:

- Issuing Fixed Penalty Notices for periods of unauthorised absence (See APPENDIX 2);
- Issuing Notification of Parental Responsibility (NPR);
- Providing a chairperson for School Attendance Panel Meetings (SAPs);
- Presenting cases to court for prosecution in relation to poor school attendance.

Children Missing from Education

- 49. In relation to children missing from education specifically the BACME service will undertake the following:-
 - co-ordinate, through multi-agency work, the identification, referral, tracking and engagement of children missing or at risk of missing education
 - manage the co-ordination of the referral process
 - work in partnership with key stakeholders in Waltham Forest to develop the multi-agency network so that all members are aware of the referral process for children who are missing or at risk of missing education
 - manage a central database of all children missing or at risk of missing education in the borough and monitor the effectiveness of interventions and placements
 - identify and allocate a lead professional in relation to Children Missing Education
 - · follow robust monitoring systems to confirm residency of children moving out of the borough
 - raise awareness of the service and provide guidance/advice to all schools and lead professionals in the borough regarding children missing education

Part-time Timetables

50. All schools are required to alert the BACME service to any child who is placed on a part-time timetable. The BACME service will monitor the implementation and reviews of the part-time timetable to ensure that children are returned to a full time timetable at the earliest opportunity.

Legal Action

51. In situations where parents/carers fail to ensure regular attendance, the BACME service will, where appropriate, take legal action against parents/carers. The service can also pursue Education Supervision Orders for children of school age who refuse to comply with the reasonable boundaries and expectations set by parents/carers, school and Local Authority. The service will issue fixed penalty notices in situations where parents/carers appear unwilling to change patterns of poor attendance, but where prosecution is not appropriate to the level of absenteeism and current interventions. Parenting Contracts can also be implemented to address specific areas of parenting.

Child Employment

52. The BACME service is responsible for licensing and ensuring compliance with the bye-laws relating to the employment of children, and children engaged in entertainment and Chaperon Licensing.

Elective Home Education

53. The BACME service deploys an officer who co-ordinates support to families who elect to educate outside of the mainstream education system. Where an EHC plan is in place, officers from the Disability Enablement Service and Educational Psychologists will work alongside the dedicated EHE officer to provide advice and guidance to families who are making their own educational provision.

Behaviour and Attendance Partnership (BAP)

- 54. A Behaviour and Attendance Partnership is facilitated by the BACME service. Attendance and behaviour representatives from schools and relevant agencies meets to consider a range of management information and data related to school attendance and behaviour to:
 - Ensure all children can achieve their full potential by improving outcomes for children in relation to attendance and behaviour at school, college or other alternative provision

- Provide strategic direction to the school leads and behaviour and attendance work
- Agree an outcomes framework for the Behaviour & Attendance Partnership
- Monitor and evaluate outcomes for vulnerable children's behaviour and attendance
- Identify and communicate key issues relating to behaviour and attendance
- Agree strategies relating to behaviour and attendance and ensure work in behaviour and attendance aligns with children's services priorities
- Share best practice, information and training opportunities to support improvement

Responsibilities of other agencies

- 55. As part of their strategy to improve participation in education, schools may refer to alternative education provision in situations where all attempts to retain the pupil in mainstream education have been unsuccessful. Schools retain the responsibility for monitoring and tracking attendance and pupil support.
- 56. Where poor attendance has arisen <u>d</u>ue to significant unmet social, emotional and/or behavioural needs, and where school interventions have not been able to meet these needs, support for the child can include a referral to the Fair Access Panel (FAP). In these cases, the referral to FAP will primarily be for a child with significant unmet behavioural needs who is at risk of permanent exclusion and the FAP can consider a temporary placement to assess and intervene for the behaviours that are affecting attendance. Following this, a re-integration plan will be negotiated to return the pupil to mainstream education setting. If agreement is reached, the pupil will usually become dual registered at both the school and the alternative provider until such time as a return to mainstream has been affected. This option will be considered only in circumstances where:
 - all other strategies have failed (or are likely to fail) to secure regular attendance at school;
 - it is clear through a careful assessment of the pupil that an alternative education provision is likely to be the most appropriate way of meeting his or her educational needs.
 - Where there is a professional recommendation from appropriate agencies that an alternative education provision is suitable to support the behaviours that are affecting attendance.

Safeguarding

- 57. School aged children in Waltham Forest have the right to receive an appropriate education. There are several ways a child might fail to access the school system and become missing from education. All schools and agencies within Waltham Forest must be proactive in ensuring that as far as possible, children are not lost to education and that when families inform schools of relocation, all relevant information about destination, forwarding addresses, new schools, etc is sought. It is not acceptable to de-register a child with only minimal information on where the family are moving to.
- 58. The Children Act 2004 places a duty on all agencies to work together to promote the welfare of children and to share information appropriately. Information is shared in accordance with the Data Protection Act 1998 and personal information can be shared under Paragraph 5(c) of Schedule 2 of the Act.
- 59. A child missing from education is defined by the DfE as "a child of compulsory school age who is not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who has been out of any educational provision for a substantial period of time (usually four weeks or more)".

- 60. Children Missing Education Statutory Guidance for Local Authorities January 2015 states that all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education (CME) are at significant risk of underachieving, being victims of abuse, and becoming NEET (not in education, employment or training) later in life.
- 61. By following this guidance, we have ensured that robust procedures and policies are in place to enable us to meet our duty in relation to these children, including a single referral point that schools and other agencies can make referrals. In the borough, all referrals for the BACME service including children missing education is made through <u>BACME-Referral@walthamforest.gov.uk</u>
- 62. By adopting a robust and clear protocol in relation to children missing education it aims to ensure that our safeguarding responsibilities are met. We effectively ensure a child's safety when we know how and where children are receiving their education.
- 63. We are committed to undertaking regular reviews and evaluations to our processes to ensure that these continue to be fit for purpose in identifying and dealing with children missing education in our borough.
- 64. Waltham Forest has implemented systems to enable us to establish the identities of children of statutory school age in our borough, as far as it is possible to do so, who are not registered children at a school, and are not receiving "suitable education" otherwise than at a school.

Reviewing this protocol and school attendance policies

- 65. This attendance protocol will be reviewed and updated annually and published on the Waltham Forest website.
- 66. School attendance policies should be reviewed at least annually. School governing bodies should request the outcome of the annual review as part of the head teacher's annual attendance report.

Comments and complaints

- 67. Comments and complaints regarding the protocol and procedures set out in this document should be forwarded to the Head of Service for BACME Cheryle Davies, <u>Cheryle.Davies@walthamforest.gov.uk</u>
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