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Belonging, Engaging, Participating: Attendance Guidance Consultation Analysis

Final Report August 2023



Llywodraeth Cymru
Welsh Government

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List of abbreviations

Additional Learning Needs	ALN
Attention Deficit Hyperactivity Disorder	ADHD
Child and Adolescent Mental Health Services	CAMHS
Education Other Than At School	EOTAS
Education Welfare Officer	EWO
Education Welfare Service	EWS
Emotionally Based School Avoidance	EBSA
Looked-After Children	LAC
Pastoral Support Plan	PSP
Pupil Referral Unit	PRU
Speech, Language and Communication Needs	SLCN

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1. Introduction and background

On 5 June 2023, the Welsh Government launched a six-week public consultation to seek views on the guidance in the draft '[Belonging, engaging and participating: Guidance on improving learner engagement and attendance](#)'. The consultation document will be henceforth referred to as the 'draft attendance guidance'.

This report provides an independent analysis of responses to the draft guidance on improving learner engagement and attendance in Wales. It sets out the views and perspectives offered by respondents with regard to the broad aims and specific features of the guidance outlined in the consultation document.¹

1.1 Background

In Wales, school attendance policy and legislation play a crucial role in shaping the educational landscape and ensuring that all learners have access to quality learning experiences. The legal framework, combined with governmental initiatives, strives to promote regular attendance, address persistent absenteeism, and create an environment that is conducive to effective learning.

The cornerstone of school attendance policy in Wales is the **Education (Wales) Act 1996**, which sets out the legal framework governing school attendance and the responsibilities of various stakeholders. The Act places a duty on parents to ensure their children's regular attendance at school, and also mandates local authorities and schools to monitor and promote attendance.

In addition, the Welsh Government has introduced initiatives to enhance attendance and engagement. The **All Wales Attendance Framework** offers a toolkit for the Education Welfare Service (EWS), outlining best practices, interventions, and legal measures. However, the landscape has evolved, especially in response to the challenges posed by the COVID-19 pandemic, which has prompted a review of policies and strategies to accommodate changing circumstances and support students' educational journeys effectively.

The most recent developments regarding attendance in Wales are the following:

- Financing £6.5 million for 2023/24 for more Family Engagement Officers to establish positive relationships with families and provide clear guidance and information on good attendance.
- £2.5 million for 2023/24 for Education Welfare Officers (EWO) to enable earlier support services and provide more intensive support for learners with high absence.
- All schools being required to publish or make available their attendance policies; and

¹ [Belonging, engaging and participating: Guidance on improving learner engagement and attendance in Wales](#)

- Estyn strengthening reporting requirements on pupil attendance.

The new draft guidance sets out approaches that can be used by schools, PRUs, and education other than at school (EOTAS) settings to help improve learner engagement and attendance, and by local authority services and other partners when attendance issues escalate.

1.2 Consultation

This consultation was aimed at anyone with a role or interest in school attendance, including local authorities, schools, governing bodies, parents/carers, and other interested parties. The consultation included 10 questions which asked for agreement or disagreement through the response options 'Yes', 'No', and 'Not sure', with one question using a scale of 1–5 by way of agreement or disagreement. A summary of these quantitative counts can be found in [Annexe 1](#).

The consultation sought views on:

- the usefulness and practicality of the guidance
- the way in which the guidance sets out the responsibilities of schools and governors, local authorities, and parents and carers
- the principles and approaches that should be adopted in improving engagement and attendance; and
- the statistical definition of 'persistent absence.'

2. Research method

Independent research company Wavehill was appointed in June 2023 to undertake a thorough, systematic and objective analysis of consultation responses received by the Welsh Government during the consultation period.

2.1 Analytical approach

To analyse the perspectives expressed by respondents, the authors of this report conducted a detailed thematic analysis of all free-text responses offered by respondents. This approach systematically examines each response and highlights the themes and issues that are raised. Based on this analysis, the team was then able to explore how widely held certain views and perspectives are.

The analysis was undertaken in two distinct phases. The first phase included the development of a thematic framework which provided a structure from which to capture the issues and themes raised by respondents within and across all qualitative responses. The thematic framework is important because it sets out the range of issues and themes highlighted by respondents. Secondly, to determine how significant each issue and perspective is, each response was analysed and mapped against the framework. This enabled the analysis to draw out the prevalence, including areas of consensus or disagreement, which surrounds responses to the consultation questions, including the extent of agreement with the key statements on the 'Belonging, engaging and participating' guidance.

The research team reviewed and coded responses received across different formats, including the consultation form, and unstructured responses submitted via email. This was followed by an exploration of how common certain views or perspectives are across responses to individual questions, identifying where possible trends in responses within particular stakeholder groups (e.g. individual or organisational respondent). This enabled a more fine-grained analysis of responses that drills down into certain issues or priorities.

2.2 Terminology

Whilst the research team has quantitatively analysed open questions, to aid the reader descriptive terminology is used where this aids clarity and understanding of the views captured during the consultation exercise. Details on how these terms are defined are provided below:

- **Few** – fewer than 10 responses
- **Handful** – five or fewer responses
- **Majority** – the greatest proportion of similar views expressed
- **Several** – more than two responses but not many
- **Some** – used to illustrate or introduce an issue or theme but without specifying the amount or number.

2.3 Limitations

There are a number of limitations regarding this analysis that are important to note. The respondents who kindly contributed their views and perspectives are not necessarily representative of all views in Wales. The high likelihood of self-selection and the relatively small number of responses increase the possibility that those who responded hold different views and perspectives from those that are found amongst people and communities from across Wales more broadly.

Responses varied in length and detail, which may be partly due to the wide-ranging nature of the questions, and to respondents placing varying degrees of importance on different aspects of the guidance. Not all respondents answered every question, and it was not always possible to accurately determine their full position from the information provided.

We have therefore sought to communicate the balance of opinion qualitatively. We have only made statements of prevalence where clear patterns emerge, such as where themes or sentiments are widely held amongst respondents, or if they are peripherally held only by a few. In this respect, qualitative terms are only indicative of opinions on the basis of those who responded. Therefore, statements of prevalence should not be assumed to relate numerically back to the total number of people and organisations that responded to the consultation, or to the broader population.

Given these limitations, the aim has been to effectively and accurately communicate an understanding of the range of key themes and issues raised by respondents, as well as the reasons for holding particular views. Such information includes potential areas of agreement and disagreement between the different groups of respondents.

Taken together, therefore, this analysis should be considered as providing an indication of some of the views and perspectives held by people, communities and organisations with regard to the draft attendance guidance, rather than a definitive account of views.

2.4 Responses

Between 5 June and 20 July 2023, the consultation received 98 responses. Three responses were identified as duplicates and, as such, have been excluded from the following analysis. A number of respondents submitted responses in both English and Welsh, with one doing so as two separate responses (which have been treated as one response). **This leaves a final total of 94 responses for analytical purposes.**

Responses were received from a range of individuals and organisations with an interest in the draft attendance guidance. Overall, 54 responses (57 per cent) were received from organisations and 22 (23 per cent) from individuals, with 18 respondents unknown. The table below shows the types of organisational respondents. A list of the organisational respondents can be found in [Annexe 3](#). Eighty-nine responses (95 per cent) were received in English and five (five per cent) in Welsh.

Table 2.1: Organisational respondent groups

Respondent type	Count
Local authority	16
School or governor	9
Association or union	9
Charity or third sector	8
Government arm's-length body	4
Education Welfare Service or Youth Service	3
NHS or university health board	1
Other	2

2.5 Navigating this report

This report presents a summary of the key themes and perspectives raised across responses to the consultation, both from survey responses captured via the consultation form and from responses via email (which did not follow the consultation structure). Rather, it is structured against the consultation questions, a copy of which is provided in [Annexe 2](#).

Subject to the publishing preference of survey respondents, this report draws on extracts of responses to illustrate specific themes, ideas or issues raised. These are either attributed directly to the respondent or attributed anonymously as either an individual or an organisational response.

3. Findings

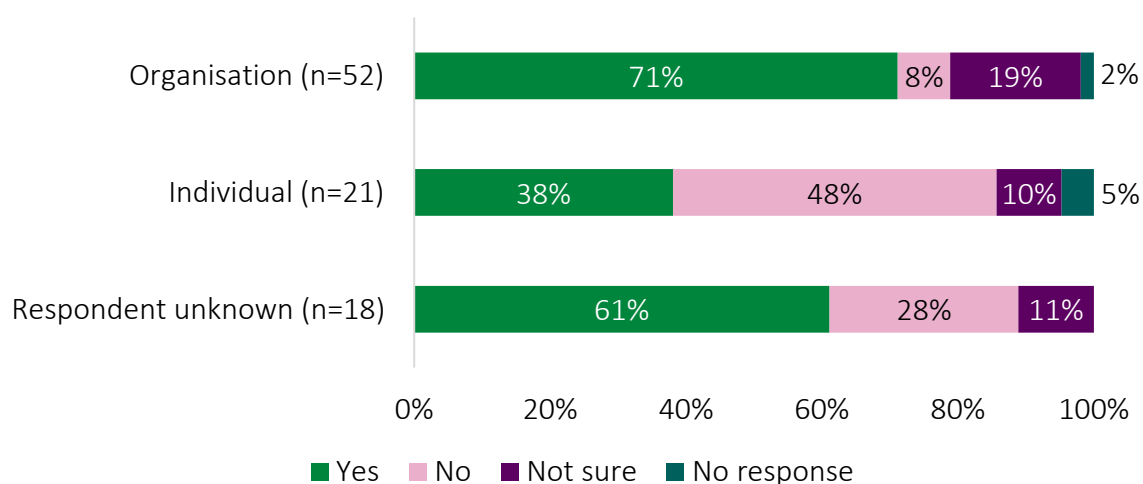
The following section of this report sets out responses to each question, drawing firstly on the responses to the closed-response options, followed by an explanation as to any further views offered in the free-text responses.

3.1 Usefulness of guidance for schools, PRUs, and EOTAS settings

Respondents provided a range of views as to whether the guidance provides suitable useful, practical information for leaders, teachers and other practitioners in schools, pupil referral units (PRUs) and education otherwise than at school settings (EOTAS) to enable schools and governing bodies to improve learner engagement and attendance (Question 1).

The majority of respondents (62 per cent) agreed with this statement, with 21 per cent disagreeing and 15 per cent stating that they were not sure. There are a number of factors which might drive respondents to be unsure, including that it may reflect the range of people commenting (including professionals in the sector, professionals outside of the sector, and members of the public).

Figure 3.1: Does the guidance provide suitable, useful, practical information for schools, PRUs, and EOTAS settings to improve learner engagement and attendance?



Source: 'Belonging, engaging and participating' consultation

A breakdown of respondent types suggests that organisational respondents may be more positive that the guidance offers useful, practical information than are individual respondents, with 71 per cent agreeing with this statement in comparison to only 38 per cent of individuals.

‘It seems to offer comprehensive, practical information for a wide range of people to enable schools to improve engagement and attendance in a wide variety of ways.’
(Individual response)

‘Clear guidelines, well set out and under relevant headings.’ **(School Governor)**

Where respondents expanded on the reasoning behind their agreement, some responses noted that the guidance is thorough or comprehensive, and were positive about the extent to which the guidance is collated in one document.

‘The guidance is holistic in nature and covers a range of attendance-related issues in depth. It is positive to see that the draft includes all stakeholders [...] that can influence and support improving attendance.’ **(Vale of Glamorgan Council)**

‘The feedback obtained from a range of [local authority] education support services to the document confirms that the document would be a positive addition to the current [Welsh Government] guidance that is available.’ **(County Council – anonymised)**

‘The guidance document is a useful résumé of existing guidance and best practice for schools and others, and it is helpful to have all the guidance restated in one place for ease of reference.’ **(National Association of Headteachers Cymru)**

However, a handful of organisational responses stated that the guidance does not provide any information for schools or governing bodies above and beyond what was already in the public domain and reinforced information found in the All Wales Attendance Framework.

‘A review of existing documents like the All Wales Attendance Framework would have better met current needs.’ **(Local Authority – anonymised)**

Many responses gave comments relating to the implementation of the guidance, as well as the need for practical guidance or strategies to support pupil engagement or attendance. Whilst a few responses noted that the case studies included in the draft guidance are useful, some were keen to see additional positive examples for the promotion of attendance.

‘Whilst we believe the themes relating to parental and pupil connectivity and engagement in school are key, on balance we do not feel it goes far enough to provide strategies around how this should be addressed.’ (Conwy Education Social Work Service)

‘The approach is suitable, but there could be more practical tools to support [local authorities] and schools when engaging with children, young people, and their families.’ (Powys County Council)

A key theme from respondents was in relation to the implementation of the guidance, with many responses reinforcing the importance of a multi-agency approach, and raising concerns that the guidance places an additional burden on schools. They also emphasised the importance of adequate funding and resources for schools and support services to fulfil their respective responsibilities in promoting learner engagement and attendance. These responses were in many cases positive about the content of the guidance, saying that it is useful and practical; however, they noted that the guidance assumes that the services surrounding schools will operate as intended, but in reality, this might not be the case due to resource and capacity challenges.

‘The emphasis is placed, yet again, on schools to lead the way to deal with issues which are in many cases centred around mental health, family wellbeing, and healthcare [...]. There is a gaping hole in the health and social care sector relating to families and learners; producing another document telling schools to do more is not the solution.’ (Individual response)

‘The responsibility for ensuring appropriate levels of attainment belongs to a multi-agency approach. No school, however successful in this area, can or should be expected to be able to turn around often entrenched attendance patterns on their own. In a situation where other agencies are being insufficiently funded and supported to perform the tasks attributed to them, it is worryingly increasingly falling to schools to try to resolve all these issues.’ (National Association of Head Teachers (NAHT) Cymru)

Concerns surrounding mental health and wellbeing, as well as the ongoing social and public health impacts of COVID-19, were raised in responses. A number of respondents commented on the waiting times for Child and Adolescent Mental Health Services (CAMHS) and the effect that these may have on attendance whilst young people are awaiting support. The assertion that “good attendance also has a positive effect on wellbeing” was also challenged by a few respondents, noting that some children and young people may experience poor wellbeing due to various factors related to their attendance.

‘The guidance is less directive about the responsibilities of the healthcare system. Whilst reference is made to CAMHS etc., the language about the responsibilities of the healthcare system to provide support could be strengthened.’ (Estyn)

‘This information is only useful if the services surrounding schools operate as intended in this document, which often they don’t. I agree with the practical information in theory, although further investigation needs to be undertaken in terms of where the real-life ‘snags’ in the system are, i.e. CAMHS has a waiting time of around 26 weeks.’ (Newport Mind)

A few respondents noted that the guidance does not cover further education (FE) colleges, which also provide education and training to young people up to the statutory school age. One respondent commented that colleges, like schools, are required to provide data on successful completion, attainment, attendance and retention and yet this draft does not include any specific details or guidance on the patterns of attendance that they might experience with their learners.

Some organisational responses suggested that the guidance could include greater attention towards children who are educated at home, considering their links to schools and/or facilities in a community with the potential to develop into supporting engagement and attendance at school in the future.

Natural Resources Wales also suggested that the guidance could better align with the new Curriculum for Wales through the concept of ‘cynefin’ — the Welsh term defined by the Curriculum for Wales as ‘the place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable’. They also highlighted perceived gaps in the guidance with regard to outdoor education as a way of supporting engagement.

‘We view the guidance as helpful in terms of promoting a two-dimensional whole-school ethos, but failure to include the outdoor element of school life, specifically natural spaces, undermines the development and embedding of best practice in supporting learners in belonging, engaging and participating fully.’ (Natural Resources Wales)

3.2 Responsibilities of stakeholders

Specific questions were asked about whether the guidance clearly sets out the legal responsibilities of **schools and governors** and the relevant **local authority**, and whether it provides sufficient information for **parents and carers** to understand their legal responsibilities for ensuring that their compulsory school-age children receive full-time education. Respondents offered a range of perspectives in response to open-text questions, some with short statements expressing general agreement or disagreement, and others providing further details which are discussed below.

3.2.1 Legal responsibilities of schools and governors

The responses show varying degrees of support for the extent to which the guidance clearly sets out the legal responsibilities of schools and governors ([Question 2](#)). Seventy-nine per cent of respondents agreed that the guidance clearly sets out the legal responsibilities of schools and governors, whereas 10 per cent disagreed and four per cent were not sure. Overall, suggestions were provided for improvements related to clarity, training and resources.

Many respondents were confident that the guidance clearly states the responsibilities of schools and governors, noting that it reiterates the legal requirements for schools to publish their attendance strategies. These responses stated that the guidance contains detailed information on governing bodies' responsibilities for learner attendance, with references to statutory regulations.

Some respondents commented that whilst the duty of schools to publish their attendance strategy was clear, this duty was not applied consistently. A few respondents expressed concerns surrounding the lack of clarity regarding the consequences if schools fail to fulfil their attendance responsibilities or if attendance registers are incorrectly completed to present a better attendance picture.

'It is also not clear who is responsible for monitoring compliance and ensuring that all schools comply with having a robust attendance policy and that the strategy is made public.' (**Children in Wales**)

Nine respondents identified themselves as a teacher, governor, or member of staff at a school. All of these respondents said 'Yes' to the question as to whether the guidance sets out the legal responsibilities of schools and governors. One respondent offered a comment that they are striving to improve but "are walking a fine line to avoid parents simply opting to home-school children". Other respondents reiterated the need for multi-agency support and offered comments on specific sections of the guidance.

‘As a school working hard to improve attendance, we don’t feel there’s much else we can do. We need other agencies to take action.’ (School)

A number of responses raised the need for training for school governors to enable them to carry out their statutory duties to ensure that they are sufficiently informed to be able to challenge processes, decisions and outcomes and contribute to a ‘whole-school approach’ (as set out in the guidance). However, some unions noted that it is critical that there is time given to support the training and professional development needs of governors, teaching staff, and wider school staff.

They suggested that additional demands on the time of the educational workforce should not be imposed without undertaking a workload impact assessment and establishing mitigations for additional workload pressures on teachers and other school staff.

‘[Governors] should receive sufficient training from their local authority to enable them to contribute to the school’s overall strategy for improving attendance and feel confident to challenge where there is insufficient improvement.’ (Conwy Youth Service)

3.2.2 Legal responsibilities of local authorities

Just over two thirds (69 per cent) of respondents agreed that the guidance clearly sets out the responsibilities of local authorities ([Question 3](#)). Around one in five respondents disagreed (18 per cent) and eight per cent stated that they were not sure.

A response from a local authority EWS noted that for them their legal responsibilities is firmly established and familiar; however, they expressed curiosity as to whether agencies unfamiliar with the protocol would fully understand the process as set out in the guidance. Another EWS noted that this was among the strongest part of the guidance, setting out a basic but clear understanding of the legal context.

‘The role of the local authority is established by law (section 436A of the Education Act 1996), but this can be a very blunt instrument. Therefore, we are pleased to see additional guidance for local authorities and parents which show the importance of school provision, absence and attendance data, home-schooling registration.’ (Union)

‘It is vital that local authorities are appropriately resourced to be able to perform the functions required of them by law or encouraged through best practice.’ (National Association of Headteachers Cymru)

Local authorities generally agreed that the guidance clearly sets out the responsibilities; however, some stated that improvements could be made to the signposting and referencing of the guidance. Furthermore, one local authority stated that the guidance could be improved by balancing the positive and supportive tone of the guidance with a more explicit approach in detailing methods of managing attendance and related accountabilities.

Several respondents recommended including an appendix or summary table outlining the roles and responsibilities of local authorities alongside parents, schools, and governing bodies to provide clarity.

A few respondents suggested incorporating guidance on cross-local-authority working to support learners and families across geographical boundaries. This echoes the sentiment across a number of responses which highlight the need for consistency. The need for guidance on how local authorities can effectively identify and monitor unregistered pupils in their area is mentioned.

‘Adding a section about cross-LA working would strengthen the document and provide clear guidance for LAs when working across geographical boundaries to support a learner and their family.’ (Powys County Council)

Concerns were raised by a response from a school with regard to the timelines depicted in the flowchart for an EWS attendance process, which may not provide enough time for effective interventions and support.

3.2.3 Legal responsibilities of parents and carers

Respondents provided mixed responses to the question on whether the guidance provides sufficient information for parents and carers to understand their legal responsibilities for ensuring that their compulsory school-age children receive full-time education ([Question 6](#)). This question elicited the lowest agreement across all questions, with only 42 per cent of responses agreeing that it did, 27 per cent disagreeing and a further 27 per cent not sure. One organisational respondent suggested that the guidance should consider the legal duties of carers in more detail.

‘The overarching legal duty on parents [...] is clear with the links to the Education Act 1996. However, the guidance does lack detail on the legal duties that carers, such as kinship, special guardians, or foster carers, have in regard to supporting children in the context of non-attendance.’ **(Children’s Commissioner for Wales)**

The majority of responses highlighted the need for a more accessible, parent-friendly, and concise version of the draft guidance, with a strong emphasis on ensuring that the guidance is targeted at the most appropriate audience. Many respondents felt that the draft guidance is too long, complicated or technical to be useful for parents, especially those with English as a second language or those who may struggle to understand complex language and jargon.

‘This is a technical document for education professionals. A more focused parent- and young-person-friendly document(s) and communications campaign is suggested to run alongside the aims of this guidance.’ **(Welsh Local Government Association)**

‘There is not a direct section that points this target audience to this information, although it is contained.’ **(County council – anonymised)**

A number of respondents also commented that whilst the guidance provides sufficient information for parents to understand their legal responsibilities, this understanding alone does not support parents to put the guidance into practice. Respondents offered a range of views on the role of schools in this regard, with some noting that a whole-school approach is needed to ensure that parents can meet their legal responsibilities, whilst a number expressed reservations regarding the disproportionate burden falling on teachers to work with parents to improve learner engagement and attendance.

‘It sets out the information, but parents are aware of this area already and awareness does not link to action without more substance.’ **(Respondent unknown)**

‘It is necessary for the wider support services to support schools with this task, as it cannot be an additional duty which is the sole responsibility of hard-working and dedicated teachers and leaders [whose] primary function is to provide education for those in the school.’ **(Union)**

A few responses stated that a communications campaign is needed to ensure that parental awareness is translated into understanding and action.

‘For example, evidence-based information on how a small increase in attendance can improve outcomes for pupils not just academically but also the social, emotional and behaviour outcomes for pupils. It would be beneficial for a communications campaign to run alongside the launching of this guidance.’ **(Education Inclusion Service, Ceredigion County Council)**

Some responses noted that the guidance should include details on parental rights as well as responsibilities, particularly in situations of conflict or disagreement. This sits in parallel to responses from representatives from schools or governing bodies, which emphasise the fragility of the relationship between schools and parents in some instances.

‘Partially, although it does not state what parents can do if the school or [local authority] is not upholding its statutory responsibility. Parents are undervalued in the system and often have few options to be heard.’ **(Newport Mind)**

‘The guidance should include more and clearer information on the rights of parents and learners in relation to sanctions and interventions they may face. It is important that the guidance acknowledges that there might be conflict around school absences and that is important that when potential punitive sanctions and interventions against parents are considered, these parents should be fully informed of their rights and given access to advocacy to make sure they can actually enforce these rights.’ **(Learning Disability Wales)**

A few responses raised concerns surrounding a deteriorating relationship between parents and schools, where it is felt that schools are often asked to fill the gaps left by wider agencies and, therefore, are unable to adopt an early intervention approach in many cases. Specific comments were made seeking clarity as to parenting contracts in the guidance, noting that whilst the guidance states that these contracts are voluntary, the potential for ‘interventions’ or ‘sanctions’ if parents refuse to sign may create a sense of coercion or shame.

‘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.’ **(Platform: for mental health and social change)**

A number of respondents emphasised the importance of providing accurate and supportive information to encourage meaningful engagement with parents, where terms such as ‘support’ and ‘communication plan’, instead of ‘contract’, make the process less intimidating for parents and carers.

3.3 Contributing factors: the many possible reasons for absence

Respondents provided a range of responses to the question of whether the many possible reasons for absence are adequately covered in the guidance ([Question 4](#)). Over half of respondents (58 per cent) agreed that they are covered, with over one quarter (27 per cent) saying that the contributing factors are not covered and a further 13 per cent not sure. Fifty-seven respondents elaborated on their response.

Overall, responses were broadly positive about the recognition in the guidance that the factors which may contribute to absence from school are complex and often interrelated. The list of factors was well received by around one quarter of organisational responses (28 per cent or 15/54 organisational responses).

‘The list of contributing factors and reasons are very helpful to assist schools and stakeholders in raising awareness around reasons for absence and shaping their response to the individual circumstances.’ (**Welsh Local Government Association**)

‘Ceir rhestr gynhwysfawr sydd wedi ei gosod allan yn glir.’ (**Undeb**)

‘There is a comprehensive list which is clearly laid out.’ (**Union** – translated from original)

The need to be considerate of school types was raised regarding the contributing factors to school absence, noting that the factors driving absence among younger pupils are significantly different from those in secondary school. Equally, transitions between schools, especially from primary to secondary or where a family may relocate, are considered to be critical periods during which attendance issues might arise, which could be further explored in the guidance.

Other respondents suggested a range of factors which they felt had been missed from this list, or that they felt could be further emphasised in the guidance. In particular, the mental health of both students and parents/caregivers was highlighted as a significant factor which is increasingly driving absence among young people. Persistent absence due to anxiety was noted by a range of respondents, with factors including the impact of social media, the pressure of academic performance, climate anxiety, and the continuing impact of the COVID-19 pandemic cited as key drivers of anxiety among young people.

It was noted by some organisational respondents that attitudes towards school attendance had shifted amongst some parents following school closures during the COVID-19 pandemic.

‘It cannot be underestimated that there is a shift in the mindset around the need to return to consistent, full-time, onsite education within schools — ‘every day matters’ theme has been lost/diluted.’ (Conwy Education Social Work Service)

Equally, some responses noted the impact of parental mental health on a young person’s attendance. In their response to the consultation, some parents shared their experiences of being unable to bring their children to school due to their own mental health needs, leading to a ripple effect on their children’s attendance. Responses from schools also highlighted this concern, with one noting that this aspect raises issues surrounding child protection and safeguarding. A few respondents stated that children with caregiving responsibilities or care-experienced children need specific consideration, given that the contributing factors affecting their attendance may differ from those of other children.

Severe period pain was raised as a significant but often overlooked factor leading to absence from school by a few organisational respondents, which is not adequately captured by the factor ‘long-term physical illness’. It was suggested that because severe period pain is typically normalised, it is also very often unmanaged. Respondents recommended that this issue be acknowledged in the possible reasons for absence, given that it affects a substantial number of learners and that its effective management aligns with the goal to improve engagement and attendance for learners with patterns of disengagement or recurrent absence.

‘Given the prevalence, frequency of absences, and compounding negative impact of severe period pain, recognition should come from leadership that period-related absence is a significant cause of school absenteeism.’ (Centre for Fertility and Reproductive Health Psychosocial Research Wales, School of Psychology, Cardiff University)

A few organisational respondents highlighted that most of the factors listed in the guidance as contributing factors are related to children themselves, as opposed to school-related factors or the ability of the educational system to meet children’s needs. For example, whilst it was considered to be positive that disability is included in the list of contributing factors, several respondents commented on the additional support needs of young people with a disability or additional learning need (ALN), where the ability of the school and wider services is deemed to be the factor determining whether this affects engagement and attendance.

Several responses noted that socioeconomic disadvantage is a contributing factor to attendance. Poverty was identified as a key barrier for families, impacting the extent to which parents can appropriately engage in their child's education. Specific challenges include but are not limited to the general increase in the cost of living, the availability of affordable transport, the cost of school uniforms and school lunches, and period poverty. One respondent noted that 'free school breakfast' schemes and after-school activities have been shown to make a positive contribution to enhancing attendance rates in some educational settings.

Six respondents raised barriers in relation to transport and transport-related challenges, including cost, availability and accessibility imposing barriers to children attending school regularly. Schools in rural areas were said to face greater challenges in this area, as children may face a longer journey to school, may be poorly served by affordable public transport, and may face challenges relating to adverse weather conditions. Equally, primary schools, families with multiple children, and young people with ALN may face additional transport barriers to attending or engaging with school, where these pupils may need parental support to get to school. One respondent referenced the barriers outlined in the Price of Pupil Poverty Guides for schools.

'Rydym yn awgrymu cynnwys tlodi neu anfantais economaidd gymdeithasol yn fwy amlwg. Mae hon yn broblem ers tro, ond cafodd ei gwaethygu'n benodol gan y pandemig a'r argyfwng costau byw.' (Samaritans UK)

'[We] would suggest a more prominent inclusion of poverty or socioeconomic disadvantage. This is a longstanding issue but has been particularly exacerbated by the pandemic and cost-of-living crisis.' (Samaritans UK – translated from original)

'Transport to and from school (even when it is a safe, well-lit walking route) is completely overlooked in your guidance.' (School)

The Royal College of Speech and Language Therapy suggested that speech, language and communication needs (SLCN) should be included as a factor which places learners at risk of missing school, and which entails specific barriers and potential alternative timetabling. This response suggests that SLCN are the most common type of additional learning need, and there is a strong correlation between poverty and delayed language, and they should be addressed specifically by the guidance.

The impact of families taking holidays during term time was raised by a number of respondents, with different perspectives being offered in consultation responses. Some highlighted the cost of holidays outside of term time, where many families cannot afford to take holidays outside of term time, which may have the indirect effect of penalising families with lower economic means. The question of equity was raised in this instance, noting that children outside of state school provision with extended periods of holiday are less affected by the financial premium during the summer holidays. Some teachers responding to the consultation noted that families with parents in jobs considered to be ‘key workers’ during the pandemic, particularly teachers or health workers, were also disproportionately affected by this issue.

While the guidance covers many contributing factors, respondents suggested that it should be open to modification, as a better understanding of existing factors is forthcoming. Flexibility in understanding and addressing absenteeism was encouraged by some respondents, as well as the need for local context to be taken into account (rather than a one-size-fits-all response to addressing absenteeism).

3.4 Inclusion of young people with protected characteristics

Respondents provided a range of responses to the question of whether learners with protected characteristics are included in the guidance ([Question 5](#)). Over half of respondents (57 per cent) agreed that learners with protected characteristics are included in the guidance, while around one in five respondents (21 per cent) disagreed and a further one in five (20 per cent) stated that they were not sure.

Respondents were broadly positive that learners with protected characteristics are included in the guidance. A number of respondents commented that it would be useful for the guidance to reference the Equality Act (2010) and clarify the list of protected characteristics. Whilst it was noted that bullying is included in the draft guidance, a few respondents suggested that greater emphasis should be placed on addressing learners with protected characteristics due to the structural barriers that they may face to engaging with education, not only as potential victims of bullying.

‘I believe that the guidance should refer to the fact that the demographics listed here are more likely to suffer discrimination and structural inequalities. This would provide some context beyond just describing ethnicity, for example, as a ‘factor’.’
(Children’s Commissioner for Wales)

Respondents raised a number of different groups of learners for whom they felt that the guidance could be strengthened or clarified. Neurodivergent students and those with additional learning needs were mentioned by several respondents as facing a range of challenges to which specific consideration should be given regarding engagement and attendance.

‘We have seen a sharp increase in the difficulties experienced by those with [autism spectrum disorder] diagnosis/traits since [COVID-19]. These learners are struggling to return to the demands of school life and the impact the school environment has on their needs.’ (Denbighshire Education Service)

‘This guidance very explicitly does not include certain learners, specifically those with chronic conditions and disabilities [... the] framing of wellbeing as all learners being ‘healthy and confident’ makes those children who will never be ‘healthy’ seem invisible.’ (Learning Disability Wales)

Other responses sought to highlight areas in which the guidance could be strengthened based on protected characteristics under the Equality Act (2010), particularly in relation to gender identity and religious beliefs, and indirectly on an ethnicity basis where parents do not have English or Welsh as a first language.

‘Nid oes ddigon o sylw’n cael ei roi i rieni/disgyblion sy’n wynebu heriau ieithyddol e.e. disgyblion a rhieni sydd o gefndiroedd ethnig lleiafrifol.’ (Undeb)

‘Not enough attention is given to parents/pupils who face linguistic challenges, e.g. pupils and parents who are from minority ethnic backgrounds.’ (Union – translated from original)

Alignment with other Welsh Government Action Plans and policies and guidance was suggested in a few organisational responses, including the actions and priorities set out in both the LGBTQ+ Action Plan for Wales and the Anti-racist Wales Action Plan.

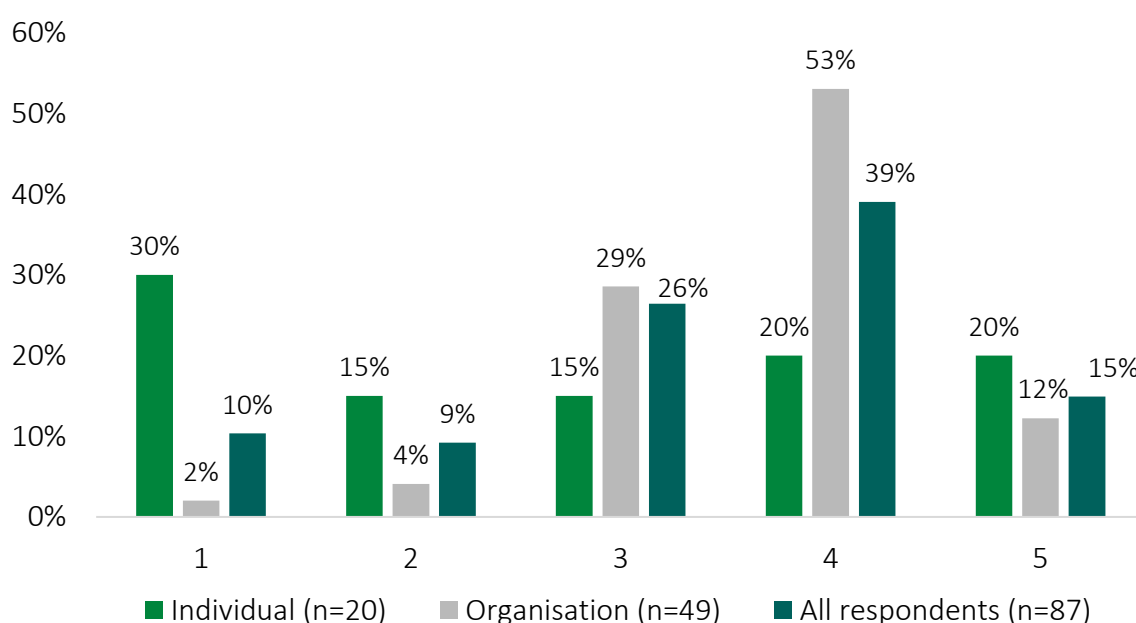
A response from a school noted concerns surrounding looked-after children (LAC), highlighting how they felt that social care services could do more to support their attendance. One organisational respondent noted that a child being care-experienced should be considered a protected characteristic in this sense, and a number of responses noted that a trauma-informed approach and the recognition of adverse childhood experiences would support LAC and all young people.

3.5 Guidance helpfulness, clarity and usability

Respondents provided a range of views as to whether the guidance is helpful ([Question 9](#)), user-friendly ([Question 8](#)), and explained clearly ([Question 7](#)).

Around half of respondents (49 per cent) agreed that the guidance is explained clearly, while 25 per cent disagreed and 21 per cent were not sure. Similarly, 44 per cent of respondents considered the guidance to be user-friendly, while 20 per cent disagreed and eight per cent stated that they were not sure.

Figure 3.2: On a scale of 1 to 5 (1 being 'not at all' and 5 being 'very'), how helpful do you find the draft 'Belonging, engaging and participating' guidance?



Source: 'Belonging, engaging and participating' consultation (n=87)

The majority of organisational respondents provided positive responses that the guidance is user-friendly for educational professionals, but several noted that it may be less accessible for parents and caregivers. A number of responses suggested that a more simplified version aimed specifically at parents, carers, and young people would be beneficial. However, several respondents reported finding the document too long and wordy in general, which might deter readers from engaging with it fully. Suggestions included breaking it down into shorter, focused documents for different audiences, as well as creating an easy-read version. A few respondents suggested that the guidance could incorporate visual aids such as infographics, charts, flow diagrams, and summaries to make it more engaging and easier to understand. Some respondents also emphasised the importance of using plain and simple language.

‘Mae’n ddogfen gynhwysfawr, ond tybed a ellid nodi’r wybodaeth mewn dull haws ei ddilyn e.e pwyntiau bwled, siartiau llif ayb.’ (Undeb)

‘It is a comprehensive document, but I wonder if the information could be set out in a way that is easier to follow, e.g. bullet points, flow charts, etc.’ (Union – translated from original)

Respondents also suggested that whilst the guidance contains useful information, it could benefit from an improved structure and coherence. Clearer headings, signposting to important sections, and examples of good practice were recommended to ensure that the guidance is read in full and implemented by the relevant stakeholder groups.

Some responses were positive about the references and signposting within the guidance; however, a few raised concerns regarding the accessibility of links to external documents and the need for ensuring that the links remain up to date.

Clarifications

A number of specific clarifications or suggestions were made, which are listed below:

- Clarification requested on the process of issuing Fixed Penalty Notices and the provision of warning letters in relation to holiday absence.
- Clarification on the process of and criteria for diagnosing emotionally based school avoidance (EBSA), given the long waiting lists for diagnostic services and the limited access to CAMHS.
- Clearer guidelines on the roles and responsibilities of schools, local authorities, and other agencies, especially in terms of referral processes.
- Clarification on who is responsible for supporting learners with period-related absences within schools.
- Clearer delineation between flexi-schooling and EOTAS (education other than at school) arrangements, particularly when both are being undertaken together.
- Further clarification on the recommended duration of EOTAS placements, as well as the nature of EOTAS in relation to learners’ attendance and engagement.
- Clarification on the expectations and procedures for reintegration interviews for parents/carers of excluded pupils, as well as the potential impact on a learner’s return to school if a parent/carer does not attend.
- Guidance on how schools should handle cases in which learners are sent home for disciplinary reasons, ensuring the health and safety of the learner, staff, and other learners.
- Clearer explanations on the use of certain attendance codes, such as Code B and Code C, in various scenarios, especially concerning alternative educational provision and reduced timetables.

- Clarification on the coverage and applicability of the guidance for different educational sectors, such as further education colleges, which currently may not be adequately covered.
- Clarification on the scope of support and financial assistance available to parents for various costs related to school attendance, such as uniforms, trips and supplies.
- Clarification on the inclusion of nature-based interventions, social prescribing programmes, and outdoor learning in the guidance, particularly in relation to learners' wellbeing and engagement.

3.6 Adequacy of information

The consultation asked the extent to which respondents felt that the draft guidance provides adequate information in relation to specific sections of the report:

- explaining the principles and approaches that should be adopted in improving learner engagement and attendance ([Question 10i](#))
- identifying the contributing factors that may impact on attendance ([Question 10ii](#))
- signposting to further guidance and good practice ([Question 10iii](#))
- recording and analysis of attendance data ([Question 10iv](#))
- family engagement and multi-agency support ([Question 10v](#))
- formal absence management([Question 10vi](#)).

3.6.1 Principles and approaches to improving attendance

Nearly two thirds of respondents (63 per cent) agreed that the guidance provides adequate information in relation to explaining the principles and approaches that should be adopted in improving learner engagement and attendance, while 22 per cent disagreed and 10 per cent stated that they were not sure.

Many respondents stressed the need for approaches that are child-centred, allowing for individualised support and paced interventions that are responsive to children's abilities and needs. While some respondents stated that they found the principles and approaches to be relevant and clear, others suggested that they may have been more pertinent in the past or that they might not fully address current challenges, especially those related to COVID-19.

The concept of community-focused schools was endorsed by a number of respondents, with a call for more emphasis on partnerships between schools, families, and various community organisations. The impact of funding cuts on community support services was highlighted as a concern by a few respondents. Equally, several respondents commented that the guidance could provide more clarity as to the range of services that schools can access for support.

Building positive relationships, fostering a supportive school culture, and maintaining a positive ethos were all noted to be positive approaches suggested by the guidance. However, a few respondents responded negatively to the suggestion to smile at pupils.

‘Things like ‘smiling’ at pupils appear quite patronising (as opposed to helpful advice).’ (School)

The guidance’s emphasis on a learner-centred approach based on the United Nations Convention on the Rights of the Child (UNCRC) was generally supported, with suggestions to highlight specific UNCRC articles and promote knowledge and understanding of the UNCRC through the curriculum.

‘The draft guidance places appropriate emphasis on a learner-centred approach entrenched in the United Nations Convention on the Rights of the Child and the Welsh Government’s core aims based on the Convention. It provides a clear rationale for implementing approaches to strengthen engagement with families.’ (Estyn)

‘We are supportive of a learner-centred approach based on the rights of the child, but acknowledge that this must also hold in balance the curriculum, schools and staffing and the rights of employees.’ (Union)

3.6.2 Identifying contributing factors

Three out of five respondents (62 per cent) agreed that the guidance provides adequate information in relation to identifying the contributing factors that may impact on attendance, while 22 per cent of respondents disagreed and 10 per cent stated that they were not sure.

For further details on responses in relation to identifying contributing factors, please see Section 3.3.

3.6.3 Signposting to further guidance and good practice

Just under half of respondents (46 per cent) agreed that the guidance provides adequate information in relation to signposting to further guidance and good practice, while 20 per cent of respondents disagreed and 29 per cent were not sure. A handful of respondents suggested that signposting to further guidance and good practice is valuable; however, there were requests for a more comprehensive and up-to-date collection of resources, potentially featuring both practical strategies and theoretical guidance. Respondents recommended organising the resources and further guidance in an easily accessible manner, such as an appendix, for the convenience of the relevant audiences of the guidance.

3.6.4 Recording and analysis of attendance data

Over two thirds of respondents (67 per cent) agreed that the guidance provides adequate information in relation to the recording and analysis of attendance data, while 10 per cent of respondents disagreed and 16 per cent stated that they were not sure. Many responses noted that the guidance reinforces legal requirements and provides clear statements regarding the use of absence codes. A few responses noted that it is the All Wales Attendance Framework that provides details and clarity in this area.

For some respondents, particularly third sector organisations, the discretion of schools to determine the justifiability of reasons for absence remains a concern, with several respondents seeking accurate, clear and unambiguous statements relating to use of the ‘B code’. Additionally, specific codes for issues like poor mental health, period-related absence, and emotionally based school avoidance (EBSA) were suggested to help improve monitoring and understanding of their impact. Clear guidance was also sought on how to manage absences related to anxiety, autism, and attention deficit hyperactivity disorder (ADHD). One respondent noted that schools should consider whether requesting medical evidence is appropriate or legal in such cases.

‘Byddai’n dda pe bai’r codau absenoldeb yn cael eu rhoi at ei gilydd ar ffurf tabl syml a fyddai’n hwylus i athrawon gyfeirio ato.’ (**Undeb**)

‘It would be good if the absence codes were put together in the form of a simple table that would be easy for teachers to refer to.’ (**Union** – translated from original)

One individual sought better processes for parents to report absences, such as through an online portal. Another individual noted that schools should not use attendance data as a sole measure of success regarding engagement and attendance, whilst one organisational response suggested that the overreliance on attendance as a measure of engagement and success could have negative consequences.

One local authority noted that the reference to the comparison of data at local, regional and national levels feels incompatible with the directive to move away from this in recent years, suggesting that the availability of datasets has made comparison more difficult.

‘Currently, data collection is inconsistent between [local authorities], education welfare services, and [Education Welfare Officers]. We’re not collecting data on the same things at the same time. More guidance on a unified approach to this, even if it were a case study and a suggested way forward, would be helpful.’ (**Education Welfare Service – Swansea**)

A few organisational responses gave comments on reduced timetabling, with one noting that it is useful in helping schools and families to see this approach as a supportive measure. Respondents provided some areas which they felt could be strengthened. Equally, the Children's Commissioner noted experience from casework which demonstrates that few children ever return to a full timetable after having been on a reduced timetable, citing the pressures that this places on the family unit and the potential for further educational disengagement.

'The guidance could also be strengthened by referencing that while there may be circumstances where a reduced timetable is necessary for individual learners' wellbeing or specific educational needs, efforts should be made to minimise the potential disadvantages by providing appropriate support, monitoring progress, and ensuring a comprehensive and engaging learning experience (despite the reduced hours).' (Estyn)

3.6.5 Family engagement and multi-agency support

Three in five respondents (60 per cent) agreed that the guidance provides adequate information in relation to family engagement and multi-agency support, while 16 per cent of respondents disagreed and 18 per cent were not sure.

The responses highlighted various concerns and suggestions related to family engagement and multi-agency support. There was a recognition that whilst the guidance addresses these aspects, the actual accessibility and effectiveness of working with other agencies may be limited due to stretched resources and a high threshold for intervention. Some responses called for Family Engagement Officer roles to be mandatory and funding to be provided for them in all schools, with some organisational respondents citing examples in which children and their families have not received adequate support to navigate persistent non-attendance and exclusions.

Overall, respondents were seeking examples of practical and tangible steps to ensure effective family engagement and multi-agency support, while acknowledging challenges due to budgetary cuts and systemic issues.

'The guidance supported this work in helping to break down barriers and include the voice of the child.' (Conwy Youth Service)

Some responses noted that this section could refer to the existing guidance on [Community Focused Schools](#), and the recently published [NEST Framework](#). Equally, a number of responses highlighted the importance of student/young person voice regarding all aspects of attendance and engagement, pointing to [Amplify!](#) (How to maximise young people’s voices through your secondary school council) as guidance in this area.

3.6.6 Formal absence management

Responses regarding formal absence management were mixed, with the importance of early identification welcomed by several respondents, along with the detail surrounding Pastoral Support Plans (PSP). Fifty-six per cent of respondents agreed that the guidance provides adequate information in relation to formal absence management, while 11 per cent disagreed and 19 per cent were not sure.

Processes such as First Day response and follow-up with any safeguarding concerns are noted in the guidance, and a few respondents were confident that the guidance explains the process of why these would be required.

‘The flow chart is [a] useful tool to enable schools to understand the process once a referral has been made to the EWS and the work that needs to be completed prior to a formal absence management.’ (Education Inclusion Service, Ceredigion County Council)

However, a few respondents with a range of perspectives suggested that the proposed guidance assumes sufficient staffing and resources to effectively handle each stage of the process of formal absence management. Some respondents highlighted that the system can fall short when agencies are overwhelmed, which may lead to the burden falling on schools.

A few respondents emphasised the need for schools to exhaust all informal processes and interventions before resorting to measures of formal absence management, whilst a number of responses highlighted the need for a collaborative approach with local authorities and the legal system.

‘These proposals should not expect school staff to go beyond their remit and risk damaging the relationships which they have with families, with any necessary enforcement action or sanction always remaining the sole responsibility of the local authority and legal system.’ (Union)

There were a few cases in which respondents raised concerns regarding the use of Pastoral Support Plans (PSP) in ALN processes and for very young children. Some respondents believed that PSPs could be used inappropriately, and called for a trauma-informed approach to avoid punitive measures that could lead to disengagement from learners and families. Equally, one respondent requested clarification on the use of PSPs, suggesting that using PSPs as a means of managing behaviour is part of the Welsh Government guidance on exclusions.

‘We are opposed to the use of Fixed Penalty Notices, as they impact disproportionately on lower-income families.’ (Children’s Commissioner for Wales)

3.7 Definition of persistent absence

Respondents offered a range of perspectives as to the proposal that the statistical definition of persistent absence be amended to over 10% over sessions ([Question 11](#)). Around half (46 per cent) of respondents agreed that the definition of persistent absence should be amended from 20 per cent to 10 per cent, with one quarter (24 per cent) saying that it should not and about the same proportion (23 per cent) stating that they were not sure.

Respondents provided a range of perspectives both on the specific changes suggested by the guidance and on the general principle of persistent absence. A few respondents noted positively that an altered definition could provide the opportunity for early intervention, as many pupils are difficult to re-engage in the educational system once they have reached the point of 20 per cent non-attendance.

However, many respondents who had responded with ‘Yes’ to the question also provided feedback as to how the guidance could be strengthened, and expressed the possible negative consequences as well as reflections on altering the definition that would need to be considered before implementing a new definition threshold.

‘Having a more specific definition for persistent absence would make it easier to understand in a statistical context. It would still be to the detriment of those who struggle to attend, or have difficulties, as even if they are on a planned phased return, or reduced timetables, then they are still, in essence, penalised for their attendance even if they are attending their plan fully.’ (DASH Mental Health, Wellbeing & Behaviour Support and Education CIC)

‘[...] The argument of prudence and consistency of approach is a significant one here. Bringing the statistical definition of persistent absence in line with the definition currently used in England does allow for some useful comparisons with the wider UK, but in the short term will make meaningful comparison with previous Welsh data less possible, and in actuality may make the absence rate appear worse than present.’ **(Union)**

‘The change in definition itself is not problematic and may make it clear to families what levels of attendance are unacceptable (if communicated nationally by Welsh Government). This could have a supportive element for schools and [local authorities].’ **(Local authority – anonymised)**

Many respondents agreed in principle that the definition of persistent absence should be amended, but were also hesitant with regard to what implications the additional pressures could bring to an educational system already struggling with capacity, staffing and funding in the present climate. Instead, some questioned if this was the right timing for such a change.

‘We agree in principle to this change from the young person’s perspective in regard to ensuring their safety and achievement. However, the latest published WG data is showing an average attendance rate for Wales of 89.5 per cent. In a sense, the ‘average learner’ would be a persistent absentee under this proposal. There would be a huge workload issue in terms of the additional resource that would be required to make this change influence actual practice in schools and [local authorities].’
(Welsh Local Government Association)

Many non-governmental organisations provided feedback that could improve the likelihood that changing the definition would bring positive changes to pupils and families affected. A number of respondents added that complex factors are driving absences in Welsh schools. Some respondents called for individualised systems framed around the needs of each child, taking their individual challenges in attending school into account before making a judgement as to what strategies to engage for each child.

‘Attendance cannot be considered in isolation. As highlighted, there [are] many interrelated and overlapping causes of absence and the varied nature of the learner experience in school and at home. We should consider that this measure is not necessarily ‘good attendance’, but a way of considering what might be needed to support. [...] Most importantly, we should think carefully about reducing children and their families to statistical numbers. There are many factors that could lead to ‘persistent absence’, and any statistical definition should reference this.’ **(British Psychological Society)**

Several schools and local authorities mentioned that they were positive about aligning the definition with that of England, leading to greater comparison across the nations, while some respondents stated that this would be a negative, and cited a lack of flexibility and individuality in approaching pupils’ attendance in the English system as a detriment to the children affected by complex issues that could lead to lower attendance.

3.8 Welsh Language

Respondents offered a range of views as to the effects that the draft guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English ([Question 17 and 18](#)).

Whilst many respondents felt that the attendance guidance itself might not have a direct impact on the Welsh language, there was a range of opinions regarding the significance of attendance for Welsh language usage and the need for inclusive approaches to language engagement. Some respondents did not foresee any specific positive or negative effects on the Welsh language resulting from the guidance, and a few raised concerns about the perceived prioritisation of the Welsh language over other factors relating to attendance.

Some responses highlighted the importance of offering support in the preferred language, especially for Welsh speaking parents to support engagement with schools.

‘It is clearly vital that in engaging with pupils, parents and local communities that they are addressed in the language with which they are most comfortable’ **(National Association of Headteachers Cymru)**

Several respondents argued that better attendance, particularly among Welsh-medium school pupils who do not use Welsh at home, is crucial for maintaining and enhancing the Welsh language. A few organisational responses emphasized that improved attendance and engagement could lead to more opportunities to use and improve usage of the Welsh language.

‘Mae presenoldeb uchel yn hollbwysig i ddisgyblion o gartrefi di-Gymraeg sy’n mynychu ysgolion cyfrwng Cymraeg. Os mai dim ond yn yr ysgol y maent yn dod I gysylltiad â’r Gymraeg, mae presenoldeb isel yn mynd i gael effaith negyddol ar eu safon yn y Gymraeg.’ (**Undeb**)

‘High attendance is crucial for pupils from non-Welsh-speaking homes who attend Welsh-medium schools. If they only come to school contact with the Welsh language, low attendance is going to have a negative effect on their standard in the Welsh language.’ (**Union** – translated from original)

To mitigate potential negative effects, some respondents suggested adopting a balanced approach that considers the linguistic needs of both Welsh and English speakers. This could involve providing support for struggling students while respecting the cultural importance of the Welsh language. To increase positive effects, many respondents emphasized the need for engagement strategies that respect individuals' language preferences. Engaging families and students in their preferred language could foster better communication and understanding.

4. Summary

This report provides an independent analysis of responses to the draft guidance on improving learner engagement and attendance in Wales. It sets out the views and perspectives offered by respondents with regard to the broad aims and specific features of the guidance outlined in the consultation document. The consultation received responses from a range of individuals and stakeholders, including individuals who identified themselves as parents, teachers or school governors. Organisational responses were received from local authorities across Wales, Education Welfare Services or Youth Services, Unions and Associations, and third sector organisations.

Our analysis finds general support for the proposed ambition outlined in the strategy, both from organisations and individuals responding to the survey. Many responses gave comments relating to the implementation of the guidance, as well as the need for practical guidance or strategies to support pupil engagement or attendance.

Many respondents were confident that the guidance clearly states the responsibilities of schools and governors, however a number of respondents expressed concern about the burden this may place on schools. Local authority respondents were broadly confident that the guidance set out their own legal responsibilities but noted that all partners needed to be able to interpret and use the guidance to understand the responsibilities and remits of other partners who work to support engagement and attendance. Those responding to the consultation emphasised the need for an accessible, parent-friendly, and concise version of the draft guidance, with a strong emphasis on ensuring that the guidance is targeted at the most appropriate audience.

Overall, respondents were positive the draft guidance recognised that the factors which contribute to low attendance are complex and often interrelated. Respondents highlighted a range of complex barriers to engagement and attendance, including poor mental health in either pupils or parents, period poverty, socioeconomic disadvantage and poverty, poor transport, additional learning needs, and speech and language needs. Equally, learners with protected characteristics under the Equality Act (2010) were noted to have been included in the guidance. However, respondents sought specific clarity on how to better support learners with protected characteristics and suggested that the guidance should make direct reference to the Equality Act (2010).

The majority of organisational respondents provided positive responses that the guidance is user-friendly for educational professionals, but several noted that it may be less accessible for parents and caregivers. Respondents also suggested that whilst the guidance contains useful information, it could benefit from an improved structure and coherence. Respondents highlighted a range of specific clarifications on the guidance, which are listed in [Section 3.5](#).

While some respondents stated that they found the principles and approaches to supporting engagement to be relevant and clear, others suggested that they may have been more pertinent in the past or that they might not fully address current challenges, especially those related to COVID-19. Equally, the concept of community-focused schools was endorsed by a number of respondents, with a call for more emphasis on partnerships between schools, families, and various community organisations. Signposting to further guidance and good practice was also noted to be valuable; however, there were requests for a more comprehensive and up-to-date collection of resources, potentially featuring both practical strategies and theoretical guidance.

Respondents shared a range of views and perspectives on the recording and analysis of attendance data, with some noting that the guidance reinforces legal requirements and provides clear statements regarding the use of absence codes, with others seeking clarity on these codes. A few responses noted that it is the All Wales Attendance Framework that provides details and clarity in this area.

The responses highlighted various concerns and suggestions related to family engagement and multi-agency support. There was a recognition that whilst the guidance addresses these aspects, the actual accessibility and effectiveness of working with other agencies may be limited due to stretched resources and a high threshold for intervention. Responses regarding formal absence management were mixed, with the importance of early identification welcomed by several respondents, along with the detail surrounding Pastoral Support Plans (PSP).

There was a general consensus that amending the definition of persistent absence was positive, suggesting that an altered definition could provide the opportunity for early intervention. Many respondents agreed in principle that the definition of persistent absence should be amended but were also hesitant with regard to what implications the additional pressures could bring to the educational system.

Whilst many respondents felt that the attendance guidance itself might not have a direct impact on the Welsh language, there was a range of opinions regarding the significance of attendance and engagement at school for supporting usage of the Welsh language. Some responses highlighted the importance of offering support in an individual's preferred language, especially to support engagement with Welsh-speaking parents.

5. Annexes

Annexe 1: Data

Question 1: Does the draft 'Belonging, engaging and participating' guidance provide suitable, useful, practical information for leaders, teachers, and other practitioners in schools, Pupil Referral Units, and 'education other than at school' settings to enable schools and governing bodies to improve learner engagement and attendance?

Response	Count	Percentage
Yes	56	62%
No	19	21%
Not sure	14	15%
No response	2	2%
Total	91	

Question 2: Does the draft 'Belonging, engaging and participating' guidance clearly set out the legal responsibilities of the school and governors?

Response	Count	Percentage
Yes	72	79%
No	9	10%
Not sure	6	7%
No response	4	4%
Total	91	

Question 3: Does the draft 'Belonging, engaging and participating' guidance clearly set out the responsibilities of the local authority?

Response	Count	Percentage
Yes	63	69%
No	16	18%
Not sure	7	8%
No response	5	5%
Total	91	

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

Response	Count	Percentage
Yes	53	58%
No	25	27%
Not sure	12	13%
No response	1	1%
Total	91	

Question 5: Are learners with protected characteristics included?

Response	Count	Percentage
Yes	52	57%
No	19	21%
Not sure	18	20%
No response	2	2%
Total	91	

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

Response	Count	Percentage
Yes	38	42%
No	25	27%
Not sure	25	27%
No response	3	3%
Total	91	

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

Response	Count	Percentage
Yes	44	49%
No	22	25%
Not sure	19	21%
No response	4	4%
Total	89	

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

Response	Count	Percentage
Yes	40	44%
No	18	20%
Not sure	25	28%
No response	7	8%
Total	90	

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

Response	Count	Percentage
1	9	10%
2	8	9%
3	23	25%
4	34	37%
5	13	14%
No response	4	4%
Total	91	

Question 10.1: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to explaining the principles and approaches that should be adopted in improving learner engagement and attendance?

Response	Count	Percentage
Yes	57	63%
No	20	22%
Not sure	9	10%
No response	5	5%
Total	91	

Question 10.2: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to identifying the contributing factors that may impact on attendance?

Response	Count	Percentage
Yes	56	62%
No	18	20%
Not sure	13	14%
No response	4	4%
Total	91	

Question 10.3: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to signposting to further guidance and good practice?

Response	Count	Percentage
Yes	42	46%
No	18	20%
Not sure	26	29%
No response	5	5%
Total	91	

Question 10.4: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to recording and analysis of attendance data?

Response	Count	Percentage
Yes	61	67%
No	9	10%
Not sure	15	16%
No response	6	7%
Total	91	

Question 10.5: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to family engagement and multi-agency support?

Response	Count	Percentage
Yes	54	60%
No	14	16%
Not sure	16	18%
No response	6	7%
Total	90	

Question 10.6: Does the draft 'Belonging, engaging and participating' guidance provide adequate information in relation to formal absence management?

Response	Count	Percentage
Yes	56	62%
No	10	11%
Not sure	17	19%
No response	8	9%
Total	91	

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

Response	Count	Percentage
Yes	42	46%
No	22	24%
Not sure	21	23%
No response	6	7%
Total	91	

Annexe 2: Consultation questions

Belonging, engaging and participating

Consultation response form

Your name:

Organisation (if applicable):

Email/telephone number:

Your address:

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

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

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

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

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

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

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

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

Question 5 – Are learners with protected characteristics included?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- iii. signposting to further guidance and good practice?

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

- iv. recording and analysis of attendance data?

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

v. family engagement and multi-agency support?

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

vi. formal absence management?

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

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

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

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

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

Supporting comments:

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

Supporting comments:

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

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

Annexe 3: Organisational respondents

The below list contains the details of respondents who gave their organisation's details. Some names or organisations have been anonymised based on respondent preferences.

- Association of School and College Leaders (ASSL) Cymru
- Blaenau Gwent County Borough Council
- Blessed Carlo Acutis Middle School
- British Psychological Society
- Cardiff Local Authority's Education Directorate
- Centre for Fertility and Reproductive Health Psychosocial Research Wales, School of Psychology, Cardiff University
- Children in Wales
- Children's Commissioner for Wales
- Community Union
- Conwy Education Social Work Service
- Conwy Youth Service
- DASH Mental Health, Wellbeing & Behaviour Support and Education CIC
- Denbighshire Education Service
- Education Inclusion Service, Ceredigion County Council
- Education Welfare Service - Swansea
- Education Welfare Service or Youth Service (anonymised)
- Estyn
- FTWW: Fair Treatment for the Women of Wales
- Governor of a secondary and primary school
- Jane Ashman Safeguarding
- Learning Disability Wales
- Local Authority (anonymised)
- Local Authority (anonymised)
- Local Authority (anonymised)
- Local Authority (anonymised)
- Local Authority (anonymised)
- Local Authority (anonymised)
- Local Authority (anonymised)

- Local Authority (anonymised)
- NASUWT Cymru / The Teachers' Union
- National Association of Headteachers (NAHT) Cymru
- National Education Union (NEU) Cymru
- National Society for the Provention of Cruelty to Children (NSPCC)
- Natural Resources Wales
- Neath Port Talbot County Borough Council
- Newport Mind
- Platform - for mental health and social change
- Powys County Council
- Primary School (anonymised)
- Primary School (anonymised)
- Primary School (anonymised)
- Primary School (anonymised)
- Royal College of Speech and Language Therapists
- Samaritans Cymru
- School Governor (anonymised)
- School Governor (anonymised)
- Secondary School (anonymised)
- Undeb Cenedlaethol Athrawon Cymru UCAC
- University Health Board (anonymised)
- Vale of Glamorgan
- Wales Safer Communities Network
- Welsh Local Government Association
- Wrexham Council

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