



Llywodraeth Cymru  
Welsh Government

**Number: WG54298**

Welsh Government  
Consultation – summary of response

## Responses to consultation on Review of school attendance codes

Consulting on draft guidance for school attendance codes

June 2026

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

## **Overview**

School attendance in Wales has not yet fully returned to pre-pandemic levels. Estyn has highlighted that secondary attendance remains below where it was before COVID-19, and that recovery may take time without sustained and targeted action.

While attendance has shown gradual improvement, accurate and detailed attendance data is essential to understanding patterns and directing support effectively. Since the current codes were introduced in 2010, we have encountered a pandemic and since then the education landscape has evolved significantly, including the expansion of online and remote learning, more flexible timetables, dual registration and part-time provision. These changes require a coding framework that better reflects different learning contexts and supports robust oversight.

Safeguarding and wellbeing priorities, such as the Whole School Approach and increasing evidence of non-physical health-related absence, highlight the need for codes that identify non-physical illness and barriers to attendance. Equity and inclusion considerations, including updated guidance for Gypsy, Roma and Traveller pupils and changing family and social circumstances, necessitate clearer coding to ensure consistency and fairness. The revisions will ensure the coding framework reflects the realities of modern education, strengthens data quality, supports safeguarding and enables more consistent, high-quality data collection across Wales.

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

## **Contact details**

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## **Additional copies**

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Review of school attendance codes](#)

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## **Introduction**

### **About the consultation**

This document presents the findings from the Welsh Government's consultation on implementation of new and amendments of the current school attendance codes.

The findings of this consultation will shape the final version of the codes which will be launched in readiness for the new school year, September 2026.

### **Next steps**

Following analysis of the consultation responses on attendance codes, the Welsh Government will take forward a programme of work to support improved consistency, clarity and use of attendance data across Wales.

### **Implementation of revised attendance codes**

The Welsh Government will update and publish revised attendance codes and associated guidance which ensures it reflects current practice and supports a clearer understanding of how to accurately record reasons for pupil absence. The revised codes are intended to improve consistency in how attendance is recorded across schools and local authorities, and to strengthen the quality and usefulness of attendance data at both local and national level to better understand the reasons behind persistent absence.

### **Training and support**

To support effective implementation, the Welsh Government will develop and deliver a structured training programme for the Education Welfare Service within each local authority. This will promote a consistent understanding and application of the revised attendance codes.

Local authorities will be supported to cascade this training to schools, ensuring that all relevant staff are equipped to apply the updated guidance consistently. This approach will help improve the accuracy of recording, ensure greater alignment in practice across Wales, and support a shared understanding of attendance expectations.

### **Partnership working and system readiness**

The Welsh Government will work closely with key delivery partners, including local authorities and management information system (MIS) providers, to support readiness for implementation. This will include ensuring that systems are updated in line with the revised codes and that schools are able to record attendance accurately using their existing platforms.

Ongoing engagement with partners will support a smooth and consistent transition to the new arrangements.

## **Monitoring and evaluation**

Following implementation, the Welsh Government will continue to monitor attendance data to assess the impact of the revised codes on data quality and to strengthen understanding of patterns and drivers of absence.

Analysis of improved attendance data will support the identification of trends and emerging issues, enabling more informed development of targeted interventions and support. This will be particularly important in supporting learners at risk of persistent absence.

## **Ongoing policy development**

The consultation responses, alongside wider stakeholder engagement, will form part of the ongoing evidence base for attendance policy. This will inform future policy development, including consideration of any further refinements to attendance codes and wider attendance guidance where required.

The Welsh Government will continue to engage with stakeholders to ensure that attendance policy remains responsive to emerging evidence and supports improved outcomes for learners across Wales.

## **Methodology and analysis**

This section outlines the approach taken to gather and analyse responses to the Welsh Government's consultation on the "Review of school attendance codes".

## **Consultation process**

The consultation was conducted over six weeks, from 12 February 2026 to 26 March 2026.

The consultation contained questions relating to the current school attendance codes as well as the implementation of new codes, alongside standard questions on the Welsh language, and it was published on the consultation pages of the Welsh Government. Respondents were able to submit their views and comments online, by email or in paper form, and in either Welsh or English. Welsh Government also produced a draft guidance document explaining the current and new codes. By producing this draft guidance document should have been used assist the respondents in being able to answer the consultation questions. The link to the consultation was shared with a range of stakeholders including representative bodies, professional bodies, sector organisations, Unions and Local Authorities. It was promoted via our Local Authority networks, Dysg and wider education policy networks.

## **Survey design**

The consultation questionnaire included:

- Forty closed questions seeking the views of respondents on each of the proposed changes. The questions asked the respondent to indicate 'Yes' 'No' or 'Not sure'. An open text box was also provided after each of the closed questions to enable the respondent to provide supporting comments.

## **Profile of online consultation respondents**

A total of 60 responses were received to the consultation. 48 responses were submitted on-line and 12 responses were submitted via e-mail. Responses were received from local authorities, primary and secondary schools, Pupil Referral Units (PRU), higher education institutions and Unions. This reflects the technical nature of the subject matter, which is primarily used and understood by schools and local authorities rather than the wider public.

12 organisations agreed to have their names published as part of the consultation response. They are:

- Gwernyfed High School
- Pembrokeshire Education Welfare Service
- Ty Gwyn Education Centre
- Ysgol Llanfyllin
- Wrexham County Borough Council
- Blaenau Gwent County Borough Council
- Ceredigion County Council
- Vale of Glamorgan County Council
- Rhondda Cynon Taf County Borough Council
- ASCL Cymru
- Powys County Council
- NAHT Cymru

All other respondents asked to remain anonymous.

## **Analysis of consultation responses**

### **Quantitative analysis of the closed questions**

Frequency totals were produced for each of the forty closed questions posed as part of the consultation. Using the draft guidance document produced, respondents were then able to check the 'Yes' 'No' and 'Not sure' tick boxes. This asked if the additional information allowed respondents to check if each section provided greater clarity.

## Analysis of the supporting comments

Thematic analysis of the qualitative data (supporting comments submitted by respondents to the open-text questions) took place with each response reviewed and themes identified.

## Consultation questions

To note: Not all respondents answered every question, therefore in some questions the response rate will be lower than the 60 responses stated in the previous paragraph.

### 1. Present and late codes

#### Question 1

##### 1.1 Does the additional information for codes $\wedge$ provide greater clarity?

Table 1: Responses to Question 1

Response category	Response total	Response percent
Yes	47	82.46%
No	7	12.28%
Not sure	3	5.26%

**Total responses (n): 57**

**Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer expectations around registration periods, particularly the emphasis on registers not remaining open beyond 30 minutes. This was widely seen as strengthening consistency, safeguarding, and first-day response practices.
- Respondents noted that the clarification helps reduce local variation in practice, particularly around afternoon registration and how lateness is recorded across different settings.
- Several contributors highlighted that clearer wording supports more accurate and defensible attendance coding, which in turn improves confidence in data quality at school, local authority and national levels.
- There was positive feedback that the revised information reinforces the statutory distinction between present, late, and absent, helping schools to apply codes more consistently and reducing ambiguity for staff responsible for register completion.

- Some respondents felt the changes would support professional dialogue with parents, by providing firmer national guidance that schools can reference when explaining attendance decisions.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt that the additional information did not materially change existing practice, particularly in schools that already operate clear local attendance procedures.
- Concerns were raised that the guidance remains overly prescriptive, with particular unease about the universal application of a 30-minute threshold in settings with different operational contexts (e.g. transport delays, internal inclusion units, rural schools).
- A number of responses questioned whether greater detail genuinely leads to clarity, suggesting instead that it may increase administrative burden or create further opportunities for misinterpretation.
- Some respondents highlighted residual inconsistency in wording, particularly where similar concepts (e.g. timing of register closure) are expressed slightly differently across sections of the guidance.
- There were calls for clearer worked examples, especially in atypical scenarios, to help schools apply the guidance proportionately and avoid overly rigid interpretations.

## Question 2

### 1.2 Does the additional information for code L provide greater clarity?

Table 2: Responses to Question 2

Response category	Response total	Response percent
Yes	42	73.68%
No	9	15.79%
Not sure	6	10.53%

**Total responses (n): 57**

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed the clearer and more explicit expectations around registration periods, particularly the strengthened emphasis that registers should not remain open beyond 30 minutes. This was widely viewed as improving safeguarding, supporting first-day response processes, and reinforcing consistent practice across schools and local authorities.
- Respondents noted that the clarification helps to reduce local variation in how lateness is recorded, especially in relation to afternoon registration and differing interpretations of when a pupil should be marked late versus absent.
- A number of contributors highlighted that clearer wording supports more accurate and defensible attendance coding, increasing confidence in the integrity and reliability of attendance data at school, local authority, and national levels.
- There was positive feedback that the revised information reinforces the statutory distinction between present, late, and absent, helping staff responsible for register completion to apply codes more consistently and with greater confidence.
- Some respondents felt that the strengthened guidance would assist schools in professional conversations with parents, providing clearer national expectations that can be referenced when explaining attendance decisions and late marks.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt that the additional information did not materially change existing practice, particularly in schools or local authorities where registration and lateness procedures are already well established.
- Concerns were raised that the guidance remains overly prescriptive, particularly regarding the universal application of a 30-minute threshold, which some felt does not adequately reflect differing operational contexts such as transport delays, rural settings, internal units, or alternative provision.
- A number of responses questioned whether increasing the level of detail genuinely improves clarity, suggesting instead that it may increase administrative burden or create further opportunities for misinterpretation by staff.
- Some respondents highlighted residual inconsistency in wording, particularly where similar concepts (such as the timing of register closure) are expressed slightly differently across sections of the guidance.
- There were calls for clearer worked examples, especially covering atypical or edge-case scenarios, to support proportionate application of the guidance and avoid overly rigid interpretations in practice.

## 2. Approved educational activity

### Question 3

#### 2.1 Does the additional information for code B provide greater clarity?

Table 3: Responses to Question 3

Response category	Response total	Response percent
Yes	47	82.46%
No	5	8.77%
Not sure	5	8.77%

**Total responses (n): 57**

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed the clearer definition of what constitutes approved educational activity, particularly the clarification that provision must be delivered in person and supervised by a tutor or teacher approved by the school. This was widely viewed as strengthening safeguarding and reducing inappropriate or overly broad use of the code.
- Respondents noted that the revised information helps to differentiate more clearly between in-person provision and remote or online learning, supporting more consistent coding decisions and reducing previous ambiguity around blended or digital provision.
- A number of contributors highlighted that the clearer criteria for Code B would support more accurate attendance data, enabling schools, local authorities, and Welsh Government to distinguish approved educational activity from authorised absence more reliably.
- There was positive feedback that the revised guidance reinforces school accountability, by making explicit the expectation that schools remain responsible for oversight, registration, and follow-up when Code B is used.
- Some respondents felt that the clarification would reduce inconsistent local practices, particularly where Code B had historically been used to record a wide range of off-site or alternative arrangements without clear supervision or agreed standards.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- A common concern was the **removal of remote or online learning from Code B**, with several respondents arguing that structured, supervised online provision (particularly for vulnerable learners, EBSA pupils, or those receiving medical or EOTAS-linked support) represents genuine engagement in education and should not be recorded as absence.
- Respondents expressed concern that reclassifying such provision as authorised absence could **negatively impact attendance figures**, potentially disincentivising schools and local authorities from offering flexible or bespoke educational packages that meet individual learner needs.
- Some contributors felt that the revised definition is **too restrictive**, failing to reflect the realities of modern provision models, particularly where education is delivered through **local authority services, virtual schools, or mixed-mode arrangements** involving safeguarding check-ins and structured teaching.
- There were questions about **practical interpretation**, including who qualifies as a “tutor or teacher approved by the school”, and whether other professionals (e.g. youth workers, learning mentors, or local authority staff) delivering structured support would fall outside the scope of Code B.
- Several respondents warned of potential **unintended consequences**, including increased pressure on EOTAS services, reduced inclusivity for learners unable to attend physically, and a risk that attendance data may not accurately reflect learner engagement or educational entitlement.

## Question 4

### 2.2 Do you agree with the decision to subdivide the P code?

Table 4: Responses to Question 4

Response category	Response total	Response percent
Yes	41	71.93%
No	7	12.28%
Not sure	9	15.79%

**Total responses (n): 57**

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed the decision to subdivide the P code, noting that it provides greater precision and transparency by distinguishing between different types of performances and the circumstances under which pupils are absent.
- Respondents highlighted that subdivision would support more accurate data collection and analysis, enabling schools and local authorities to better understand the frequency, nature, and impact of performance-related absences at both individual and system levels.
- Several contributors felt the change improves equity between different types of activities, particularly by recognising performing arts alongside sporting activities, which were perceived to have been more clearly accommodated in existing coding arrangements.
- There was positive feedback that clearer categorisation would strengthen safeguarding and oversight, particularly where performances take place during the school day or involve external organisations, by reinforcing expectations around approval and supervision.
- Some respondents noted that clearer distinctions would help schools communicate decisions to parents more confidently, reducing ambiguity about when performance-related absences are authorised and how they are recorded.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- A common concern was that subdividing the P code adds unnecessary complexity, particularly given that performance-related absences are relatively infrequent in some settings and already well understood locally.
- Several respondents questioned the distinction between paid and unpaid performances, expressing concern that coding these differently could appear arbitrary and may not reflect the educational or developmental value of the activity.
- Some contributors felt that subdivision would increase administrative burden and the risk of miscoding, particularly for staff responsible for register completion who may not always have access to detailed information about the nature of the performance.
- There were concerns about inconsistent interpretation, particularly where activities blur the boundaries between sport and performance, or where preparation, rehearsal, travel time, or licensing arrangements are involved.
- A number of responses called for clearer definitions and worked examples, warning that without these, subdivision could introduce confusion rather than improving clarity or consistency in practice.

## Question 5

### 2.2.1 Does the additional information for codes P1 and P2 provide greater clarity?

Table 5: Responses to Question 5

Response category	Response total	Response percent
Yes	36	63.16%
No	10	17.54%
Not sure	11	19.30%

Total responses (n): 57

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents felt that the additional information for P1 and P2 clarifies the distinction between sporting activities and performing activities, helping schools to apply the most appropriate code with greater confidence.
- Respondents welcomed the clearer articulation of eligibility and expectations, including the emphasis on approval, supervision, and the circumstances under which pupils may legitimately be absent for these activities during the school day.
- Several contributors noted that the additional detail supports more consistent and defensible attendance coding, reducing ambiguity and strengthening the quality of data collected at school, local authority, and national levels.
- There was positive feedback that the guidance helps to place performing arts on a more equal footing with sport, addressing a perception that sporting activities had previously benefitted from clearer or more established coding practices.
- Some respondents felt that clearer guidance would aid communication with parents and external organisations, providing firmer national parameters that schools can reference when assessing requests for absence.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- A common concern related to ongoing ambiguity around the practical application of P1 and P2, particularly where activities include elements of both sport and performance, or where preparation, rehearsal, or travel time occurs during the school day.
- Several respondents questioned the distinction between paid and unpaid performances, expressing concern that this differentiation may be difficult for schools to verify in practice and may not reflect the educational or developmental value of the activity.
- Some contributors felt that, despite additional information, the guidance still lacks sufficient worked examples, particularly for less typical scenarios such as rehearsals, mixed activities, or events taking place partly outside normal school hours.
- There were concerns that applying the revised guidance could increase administrative burden or lead to inconsistent interpretation, especially where schools rely on parental information or external providers to determine the correct code.
- A number of respondents suggested that without clearer national exemplification, the changes risk replicating existing inconsistencies rather than fully resolving them.

## Question 6

### 2.3 Does the additional information for code V provide greater clarity?

Table 6: Responses to Question 6

Response category	Response total	Response percent
Yes	38	69.09%
No	8	14.55%
Not sure	9	16.36%

**Total responses (n): 55**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer explanation of when Code V should be used, particularly the emphasis that visits must be educational in nature, school-approved, and appropriately supervised. This was viewed as strengthening safeguarding and reinforcing schools' responsibility for oversight.
- Respondents noted that the additional detail helps to distinguish Code V more clearly from other attendance codes, reducing previous ambiguity about whether certain off-site activities should be recorded as approved educational activity or absence.
- Several contributors highlighted that clearer guidance would support more consistent application across schools and local authorities, particularly where visits are organised by external providers but approved and overseen by the school.
- There was positive feedback that the revised information improves data accuracy, enabling better analysis of participation in educational visits at school, local authority, and national levels.
- Some respondents felt the clarification supports professional judgement and confidence among staff, particularly those responsible for attendance recording who may not always be directly involved in arranging visits.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- A number of respondents felt that, while additional information was helpful, it largely reflected existing practice and therefore did not significantly increase clarity for schools already applying the code appropriately.
- Concerns were raised about practical interpretation, particularly around the level and nature of supervision required, and whether supervision must always be provided by school staff rather than external organisations.
- Some contributors highlighted residual ambiguity in distinguishing Code V from other codes (such as Code B or curriculum-linked activities), particularly where visits involve mixed educational and enrichment purposes.
- There were concerns that schools may find it challenging to apply the guidance consistently, especially where visits are frequent, short-duration, or involve partial-day attendance.
- A small number of responses suggested that clearer worked examples would be beneficial, particularly for less typical scenarios, to reduce the risk of inconsistent interpretation across settings.

## Question 7

### 2.4 Does the additional information for code W provide greater clarity?

Table 7: Responses to Question 7

Response category	Response total	Response percent
Yes	39	69.64%
No	9	16.07%
Not sure	8	14.29%

Total responses (n): 56

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed the clearer definition of Code W, particularly the clarification that it applies to statutory work experience in the final two years of compulsory schooling, and that responsibility for attendance and safeguarding remains with the school.
- Respondents noted that the additional information helps to distinguish work experience from other forms of alternative or off-site provision, reducing previous confusion where Code B or other codes had been applied inconsistently.
- Several contributors highlighted that clearer expectations around monitoring and supervision would strengthen safeguarding and ensure schools retain oversight of pupils' attendance while on placement.
- There was positive feedback that the revised guidance would support more accurate data collection and analysis, particularly at local authority level when tracking participation in work-experience placements.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Some respondents felt that the changes largely reflect existing practice and do not materially improve clarity, particularly in settings where work experience is infrequent.
- Concerns were raised about practical implementation, including how often schools are expected to check attendance at placements and how partial-day attendance should be recorded.
- A number of contributors felt that additional worked examples would be helpful, particularly to clarify borderline scenarios or mixed provision arrangements.

### 3. Authorised absence

#### Question 8

##### 3.1 Do you agree with the decision to subdivide the C code?

Table 8: Responses to Question 8

Response category	Response total	Response percent
Yes	40	68.97%
No	8	13.79%
Not sure	10	17.24%

**Total responses (n): 58**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents agreed that subdividing the C code would provide greater transparency and analytical value, enabling schools and local authorities to better understand the scale and nature of different attendance arrangements.
- Respondents highlighted that subdivision supports targeted monitoring and safeguarding, particularly for pupils on reduced timetables, flexi-schooling arrangements, or other bespoke packages.
- Several contributors felt the change would enable more meaningful data analysis, supporting early intervention and system-level understanding of patterns of absence or partial attendance

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A common concern was that the subdivision introduces excessive complexity, increasing the administrative burden on schools and the risk of inconsistent application.
- Some respondents felt that the C code already functioned effectively as a flexible catch-all, and that breaking it down further risks confusion rather than clarity.
- There were warnings that without clear national exemplification, subdivision could accentuate local variation rather than reduce it.

## Question 9

### 3.1.1 Does the additional information for code C1 provide greater clarity?

Table 9: Responses to Question 9

Response category	Response total	Response percent
Yes	42	77.78%
No	6	11.11%
Not sure	6	11.11%

Total responses (n): 54

#### Among those who answered Yes, the most frequently raised themes were:

- Respondents welcomed the clearer definition of Code C1, particularly its role in capturing authorised absences not covered elsewhere, supporting consistency in coding decisions.
- Several contributors noted that clearer guidance would assist schools in defending attendance decisions, especially in conversations with parents.
- There was positive feedback that Code C1 helps to separate one-off or exceptional authorised absences from more structured arrangements covered by other C sub-codes.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Some respondents felt that Code C1 remains too broad, risking inconsistent interpretation and continued reliance on professional judgement without sufficient national parameters.
- Others questioned whether Code C1 duplicates existing codes, limiting its added value.

## Question 10

### 3.1.2 Does the additional information for code C2 provide greater clarity?

Table 10: Responses to Question 10

Response category	Response total	Response percent
Yes	35	63.64%
No	8	14.55%
Not sure	12	21.82%

**Total responses (n): 55**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents felt Code C2 provided greater specificity by explicitly identifying paid performances and similar circumstances that should be treated differently from approved educational activity.
- Several contributors noted that clearer coding would support better monitoring and safeguarding, particularly where pupils are absent during the school day for external commitments.
- There was positive feedback that the code supports more accurate national data, particularly around children involved in licensed performances.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A common concern related to the distinction between paid and unpaid performances, with respondents questioning whether this distinction is meaningful or workable in practice.
- Some contributors expressed concern that schools may struggle to verify payment status, increasing administrative burden and risk of miscoding.
- There were calls for clearer worked examples, particularly where activities sit at the boundary between Codes C2 and P2.

## Question 11

### 3.1.3 Does the additional information for code C3 provide greater clarity?

Table 11: Responses to Question 11

Response category	Response total	Response percent
Yes	39	69.64%
No	7	12.50%
Not sure	10	17.86%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed a distinct code for flexi-schooling, noting that it would increase visibility and accountability around these arrangements.
- Respondents highlighted that clearer identification of flexi-schooling would support safeguarding oversight, local authority monitoring, and reintegration planning.
- Several contributors felt the code would provide valuable system-level data on the prevalence and duration of flexi-schooling agreements.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A significant concern was that introducing a specific code may normalise or encourage flexi-schooling, leading to increased parental demand.
- Some respondents felt the guidance lacks clarity on appropriate thresholds, duration, and review arrangements, risking inconsistent application.
- There were warnings about potential negative impacts on attendance data and unintended pressure on schools.

## Question 12

### 3.1.4 Does the additional information for code C4 provide greater clarity?

Table 12: Responses to Question 12

Response category	Response total	Response percent
Yes	34	61.82%
No	13	23.64%
Not sure	8	14.55%

**Total responses (n): 57**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents strongly welcomed greater clarity around reduced timetables, viewing the code as an important tool for safeguarding, monitoring, and reintegration planning.
- Many highlighted that Code C4 would support early identification of risk, enabling schools and local authorities to challenge prolonged or inappropriate use.
- There was widespread agreement that clearer guidance strengthens accountability and consistency across schools.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt the guidance did not clearly set expectations for reduced timetables, particularly around duration, review and thresholds for use.
- Concerns were raised that, without stronger safeguards, the code could legitimise or extend reduced timetables rather than support timely reintegration.
- Respondents also called for clearer distinctions between reduced timetables and other provision, and more guidance on use in cases involving anxiety, medical needs or alternative provision.

## Question 13

### 3.1.5 Does the additional information for code C5 provide greater clarity?

Table 13: Responses to Question 13

Response category	Response total	Response percent
Yes	34	61.82%
No	13	23.64%
Not sure	8	14.55%

**Total responses (n): 55**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents acknowledged that Code C5 provides clarity by explicitly distinguishing remote learning from approved educational activity, addressing previous coding ambiguity.
- Some contributors felt the guidance reinforces safeguarding expectations, particularly the need for clear monitoring and review.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A dominant concern was that classifying structured, supervised online learning as authorised absence fails to reflect learner engagement, particularly for vulnerable pupils.
- Respondents warned of negative impacts on attendance figures, potentially discouraging schools from offering flexible or inclusive provision.
- There were concerns about increased pressure on EOTAS and EHE pathways, as well as reduced incentives for early, short-term support.

## Question 14

### 3.2 Does the additional information for code F provide greater clarity?

Table 14: Responses to Question 14

Response category	Response total	Response percent
Yes	33	58.93%
No	12	21.43%
Not sure	11	19.64%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer articulation that Code F applies to extended holidays beyond 10 school days, reinforcing consistency and alignment with statutory expectations.
- Respondents noted that clearer examples of exceptional circumstances would support fairer and more defensible decision-making by headteachers.
- There was positive feedback that the extended guidance strengthens communication with parents and challenges assumptions around term-time holidays.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt the guidance risks normalising extended holidays, potentially undermining attendance expectations.
- Concerns were raised about subjectivity in defining exceptional circumstances, risking inconsistency across schools and local authorities.
- A number of responses called for greater clarity and tighter parameters, particularly to support equity and avoid disputes.

## Question 15

### 3.3 Does the additional information for code H provide greater clarity?

Table 15: Responses to Question 15

Response category	Response total	Response percent
Yes	38	67.86%
No	12	21.43%
Not sure	6	10.71%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer explanation of Code H, particularly the emphasis that authorised family holidays should only be agreed in exceptional circumstances, which was seen as reinforcing national attendance expectations.
- Respondents felt that the inclusion of examples helps support headteacher decision-making, providing a stronger evidential basis for agreeing or refusing requests.
- Several contributors noted that clearer guidance would support more consistent practice across schools and local authorities, reducing ambiguity and challenge from parents.
- There was positive feedback that the clarification strengthens professional confidence and communication, particularly when explaining why most term-time holiday requests cannot be authorised.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents expressed concern that providing examples of exceptional circumstances could encourage parents to frame requests in ways more likely to be approved, potentially increasing pressure on schools.
- Concerns were raised about subjectivity and inconsistency, particularly where interpretations of “exceptional circumstances” may still vary between schools and local authorities.
- A number of respondents felt the guidance risks normalising term-time absence, even where the intention is to restrict it.

## Question 16

### 3.4 Do you agree with the decision to subdivide the I code?

Table 16: Responses to Question 16

Response category	Response total	Response percent
Yes	41	70.69%
No	7	12.07%
Not sure	10	17.24%

Total responses (n): 58

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents supported the decision to subdivide the I code, noting that it would provide greater insight into patterns of illness-related absence, particularly at school and local authority level.
- Respondents highlighted the potential value of distinguishing different types of illness in order to support earlier identification of need, targeted intervention, and more informed safeguarding responses.
- Several contributors felt that subdivision would improve data quality and analysis, especially in understanding trends following the COVID-19 pandemic.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- A common concern was that subdividing illness into physical and non-physical categories is operationally difficult and potentially subjective, particularly where symptoms overlap.
- Some respondents warned of confidentiality and stigma risks, particularly if mental or emotional health reasons become visible to a wider group of staff.
- There were concerns that the change may increase administrative burden, including pressure to seek medical evidence where it is not always appropriate or available.

## Question 17

### 3.4.1 Does the additional information for code I1 provide greater clarity?

Table 17: Responses to Question 17

Response category	Response total	Response percent
Yes	40	71.43%
No	7	12.50%
Not sure	9	16.07%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed the clearer description and examples of physical illness, noting that this would support more consistent and proportionate use of the code.
- Some contributors felt that the additional guidance helps clarify when schools may reasonably query absence or seek further information, supporting professional judgement.
- There was positive feedback that the guidance reinforces safeguarding expectations without requiring unnecessary medical evidence.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt that the guidance does not materially change current practice, particularly where schools already manage illness absences effectively.
- Concerns were raised about borderline cases, where physical symptoms may have underlying emotional or mental health causes.

## Question 18

### 3.4.1 Does the additional information for code I2 provide greater clarity?

Table 18: Responses to Question 18

Response category	Response total	Response percent
Yes	37	66.07%
No	10	17.86%
Not sure	9	16.07%

Total responses (n): 56

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed the visibility given to emotional and mental health-related absence, viewing this as an opportunity to improve understanding, monitoring, and support for affected pupils.
- Respondents felt the code could support data-led planning, particularly in relation to wellbeing services, EOTAS referrals, and multi-agency working.
- Some contributors noted that clearer guidance may help schools recognise patterns of entrenched absence and escalate concerns more appropriately.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- A dominant concern was the difficulty of evidencing and defining non-physical illness, particularly where diagnoses are not formally confirmed.
- Respondents raised concerns about confidentiality, stigma, and labelling, especially if sensitive information becomes widely visible through attendance records.
- There were warnings that the code could normalise prolonged absence in the absence of clear escalation thresholds or review expectations.

## Question 19

**3.5 Do you agree with the proposed change in statistical meaning for the code J1 from 'approved educational activity' to 'authorised absence'?**

**Table 19: Responses to Question 19**

Response category	Response total	Response percent
Yes	26	46.43%
No	21	37.50%
Not sure	9	16.07%

**Total responses (n): 56**

**Among those who answered Yes, the most frequently raised themes were:**

- Respondents who agreed felt the change improves clarity and consistency, aligning interview attendance more clearly with authorised absence rather than approved educational activity.
- Some contributors noted that clearer categorisation would improve data transparency, particularly around absences during critical examination periods.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- A strong and recurring concern was that attending interviews, particularly for post-16 education or training, is a legitimate and valuable educational activity that should not be treated as absence.
- Many respondents warned that the change could discourage pupils from attending interviews, potentially undermining progression and positive destinations.
- There were concerns about equity, especially where interviews occur during school hours through no fault of the pupil.

## Question 20

### 3.5.1 Does the additional information for code J1 provide greater clarity?

Table 20: Responses to Question 20

Response category	Response total	Response percent
Yes	27	51.92%
No	12	23.08%
Not sure	13	25.00%

Total responses (n): 52

#### Among those who answered Yes, the most frequently raised themes were:

- Some respondents felt the additional information provides clearer parameters around when and how Code J1 should be applied, supporting more consistent use.
- There was acknowledgement that clearer guidance could assist schools in limiting inappropriate or excessive use of the code.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Many respondents reiterated opposition to interviews being recorded as absence, even with additional guidance.
- Some contributors felt the clarification does not address core concerns, particularly around pupil progression and fairness

## Question 21

### 3.6 Does the additional information for code M provide greater clarity?

Table 21: Responses to Question 21

Response category	Response total	Response percent
Yes	40	71.43%
No	9	16.07%
Not sure	7	12.50%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed the clearer distinction between appointments that require absence and those where pupils return to school, supporting consistent application of Codes M and L.
- The guidance was seen as reinforcing reasonable attendance expectations, while recognising the inevitability of some daytime appointments.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt the guidance may penalise pupils unfairly, particularly where appointment timing is outside parental control.
- Concerns were raised about inconsistent interpretation, especially where pupils attend for part of a session.

## Question 22

### 3.7 Does the additional information for code S provide greater clarity?

Table 22: Responses to Question 22

Response category	Response total	Response percent
Yes	30	55.56%
No	11	20.37%
Not sure	13	24.07%

**Total responses (n): 54**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer limits and expectations around study leave, particularly the emphasis on controlled and proportionate use.
- Respondents felt the guidance supports equity and safeguarding, ensuring that pupils who benefit from structure are not disadvantaged.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A recurring concern was inconsistency with other Welsh Government guidance, particularly regarding the allowed number of study-leave days.
- Some respondents felt the restrictions limit flexibility, particularly for learners who study effectively at home.

## Question 23

### 3.8 Does the additional information for code E provide greater clarity?

Table 23: Responses to Question 23

Response category	Response total	Response percent
Yes	38	69.09%
No	9	16.36%
Not sure	8	14.55%

**Total responses (n): 55**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed clearer alignment between attendance and exclusions guidance, particularly around responsibility for education and safeguarding.
- Some contributors noted that the clarification supports more consistent practice during exclusion periods, including alternative provision arrangements.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A small number of respondents felt the guidance adds complexity without sufficient benefit, particularly where exclusion processes are already well established.

## Question 24

### 3.9 Does the additional information for code R provide greater clarity?

**Table 24: Responses to Question 24**

<b>Response category</b>	<b>Response total</b>	<b>Response percent</b>
Yes	37	66.07%
No	10	17.86%
Not sure	9	16.07%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer examples and reaffirmation that religious observance should be reasonably accommodated, supporting inclusion and consistency.
- Respondents felt the guidance would assist schools in making fair and defensible decisions, particularly in diverse communities.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some contributors highlighted ongoing ambiguity around which days qualify and called for updated or annually published lists.
- Concerns were raised about inconsistent application across schools, particularly where observance extends beyond a single day.

## Question 25

### 3.10 Does the additional information for code T provide greater clarity?

Table 25: Responses to Question 25

Response category	Response total	Response percent
Yes	35	64.81%
No	7	12.96%
Not sure	12	22.22%

Total responses (n): 54

#### Among those who answered Yes, the most frequently raised themes were:

- Respondents welcomed clearer guidance distinguishing circumstances where no alternative provision is made, noting that this improves transparency and consistency in exclusion-related attendance recording.
- Several contributors felt the clarification strengthens safeguarding and accountability, by making responsibilities clearer during periods of exclusion.
- There was positive feedback that the guidance aligns attendance coding more closely with exclusions legislation and statutory duties, improving coherence across policy areas.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Some respondents felt the clarification added complexity without materially changing existing exclusion practices.
- A small number raised concerns that the distinction may be difficult to apply consistently in short or rapidly changing exclusion scenarios.

## 4. Unauthorised absence

### Question 26

#### 4.1 Does the additional information for code N provide greater clarity?

Table 26: Responses to Question 26

Response category	Response total	Response percent
Yes	40	70.18%
No	10	17.54%
Not sure	7	12.28%

**Total responses (n): 57**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed the clearer expectation that Code N should be temporary and resolved within five school days, reinforcing first-day response and safeguarding practice.
- Respondents felt the guidance supports more timely follow-up with parents, reducing the risk of unexplained absence becoming entrenched.
- Several contributors highlighted that clearer time limits would improve data accuracy, ensuring unresolved N codes do not distort attendance records.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Concerns were raised about practical capacity, particularly in larger secondary schools, to resolve all absences within the specified timescale.
- Some respondents questioned whether parents can always be contacted quickly enough, suggesting the expectation may be unrealistic in some circumstances.

## Question 27

### 4.2 Does the additional information for code O provide greater clarity?

Table 27: Responses to Question 27

Response category	Response total	Response percent
Yes	37	66.07%
No	7	12.50%
Not sure	12	21.43%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed clearer articulation of when absences should be unauthorised, supporting consistent and defensible decision-making.
- Several contributors noted that clearer guidance strengthens attendance challenge processes and supports schools in addressing persistent absence.
- There was positive feedback that the guidance reinforces fairness and proportionality, while maintaining high expectations.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt the guidance does not fully capture the complex realities faced by families, risking overly rigid application.
- A small number raised concerns about increased dispute with parents, particularly where reasons for absence are contested.

## Question 28

### 4.3 Does the additional information for code G provide greater clarity?

Table 28: Responses to Question 28

Response category	Response total	Response percent
Yes	38	69.09%
No	9	16.36%
Not sure	8	14.55%

**Total responses (n): 55**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Many respondents welcomed clearer confirmation that unauthorised holidays should be recorded consistently under Code G, reinforcing national attendance expectations.
- Respondents felt the additional examples help schools justify decisions and reduce ambiguity when holidays exceed agreed limits.
- Several contributors noted improved clarity around when Code G should not be used, supporting consistency and fairness.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Concerns were raised about overlap and confusion between Codes G, H, and F, despite additional guidance.
- Some respondents felt clearer step-by-step exemplification would still be beneficial.

## Question 29

### 4.4 Does the additional information for code U provide greater clarity?

Table 29: Responses to Question 29

Response category	Response total	Response percent
Yes	40	72.73%
No	7	12.73%
Not sure	8	14.55%

Total responses (n): 55

#### Among those who answered Yes, the most frequently raised themes were:

- Respondents welcomed the reinforcement that pupils arriving after registers close should be recorded as absent, supporting consistency and safeguarding.
- Many highlighted that clearer alignment with the 30-minute rule reduces local variation and ambiguity.
- Several contributors felt the guidance strengthens first-day response and accountability.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Some respondents raised concerns that the threshold may disproportionately affect pupils facing transport or caring challenges.
- There were calls for greater flexibility or clearer allowances in exceptional circumstances.

## 5. Not required to attend

### Question 30

5.1 Do you agree with the change in statistical meaning for code D from 'approved educational activity' to 'not required to attend'?

Table 30: Responses to Question 30

Response category	Response total	Response percent
Yes	43	75.44%
No	4	7.02%
Not sure	10	17.54%

**Total responses (n): 57**

**Among those who answered Yes, the most frequently raised themes were:**

- Respondents strongly welcomed the change in statistical meaning to 'not required to attend', particularly for dual-registered pupils and alternative provision.
- Many felt this change improves fairness and accuracy by ensuring pupils and schools are not penalised for sessions they are not expected to attend.
- The guidance was seen as strengthening safeguarding clarity and data integrity.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents expressed concern about tracking visibility, warning pupils could become "invisible" without strong information-sharing arrangements.
- A small number raised questions about responsibility and oversight across settings.

## Question 31

### 5.1.1 Does the additional information for code D provide greater clarity?

Table 31: Responses to Question 31

Response category	Response total	Response percent
Yes	39	69.64%
No	5	8.93%
Not sure	12	21.43%

**Total responses (n): 56**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents felt the additional information clarifies how and when Code D should be used, supporting consistent application.
- There was positive feedback that the guidance improves communication between schools, local authorities, and alternative providers.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some contributors felt the clarification did not go far enough in setting out safeguarding responsibilities.

## Question 32

### 5.2 Does the additional information for code X provide greater clarity?

Table 32: Responses to Question 32

Response category	Response total	Response percent
Yes	41	75.93%
No	7	12.96%
Not sure	6	11.11%

Total responses (n): 54

#### Among those who answered Yes, the most frequently raised themes were:

- Many respondents welcomed clearer articulation of when pupils are not on roll and not required to attend, reducing ambiguity.
- The guidance was seen as supporting accurate registers and lawful roll management.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- A small number of respondents highlighted edge-case scenarios, particularly around phased starts and admissions delays.

### Question 33

#### 5.3 Do you agree with the decision to subdivide the Y code?

Table 33: Responses to Question 33

Response category	Response total	Response percent
Yes	38	69.09%
No	8	14.55%
Not sure	9	16.36%

Total responses (n): 55

#### Among those who answered Yes, the most frequently raised themes were:

- Respondents felt subdividing the Y code would improve understanding of closure reasons, supporting more accurate analysis and accountability.
- Several contributors noted potential benefits for system-level data, particularly in emergency or disruption scenarios.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- A common concern was that subdivision adds complexity with limited operational value, given the infrequent use of closure codes.

### Question 34

#### 5.3.1 Does the additional information for code Y1 provide greater clarity?

Table 34: Responses to Question 34

Response category	Response total	Response percent
Yes	34	62.96%
No	11	20.37%
Not sure	9	16.67%

**Total responses (n): 54**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed clearer identification of transport-related disruption, supporting fair recording of unavoidable absence.
- Some felt this would improve equity for rural and transport-dependent learners.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Concerns were raised about definitional clarity, particularly distinguishing school-provided transport from other transport issues.

## Question 35

### 5.3.1 Does the additional information for code Y2 provide greater clarity?

Table 35: Responses to Question 35

Response category	Response total	Response percent
Yes	38	71.70%
No	7	13.21%
Not sure	8	15.09%

Total responses (n): 53

#### Among those who answered Yes, the most frequently raised themes were:

- Respondents felt the sub-code supports clearer differentiation between individual and widespread disruption events.
- Several contributors noted improved regional and national reporting.

#### Among those who answered No or Not sure, the most frequently raised themes were:

- Some respondents questioned the practical benefit of splitting Y1 and Y2, given overlap in real-world scenarios.

### Question 36

#### 5.3.3 Does the additional information for code Y3 provide greater clarity?

Table 36: Responses to Question 36

Response category	Response total	Response percent
Yes	42	77.78%
No	6	11.11%
Not sure	6	11.11%

**Total responses (n): 54**

**Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed the ability to distinguish partial closures, improving accuracy of attendance analysis.

**Among those who answered No or Not sure, the most frequently raised themes were:**

- Some felt the distinction between partial and full closure adds limited value operationally.

### Question 37

#### 5.3.4 Does the additional information for code Y4 provide greater clarity?

Table 37: Responses to Question 37

Response category	Response total	Response percent
Yes	38	70.37%
No	6	11.11%
Not sure	10	18.52%

**Total responses (n): 54**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents welcomed clear confirmation of when full closure codes should apply, supporting consistent national practice.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- A small number felt the guidance adds duplication, as closures are already well understood locally.

### Question 38

#### 5.3.5 Does the additional information for code Y5 provide greater clarity?

Table 38: Responses to Question 38

Response category	Response total	Response percent
Yes	37	68.52%
No	8	14.81%
Not sure	9	16.67%

**Total responses (n): 54**

#### **Among those who answered Yes, the most frequently raised themes were:**

- Respondents felt Code Y5 provides future proofing, particularly for pandemic level or emergency scenarios.
- Several contributors welcomed explicit recognition of extraordinary, system wide disruption.

#### **Among those who answered No or Not sure, the most frequently raised themes were:**

- Some respondents felt the code may be rarely used, limiting its practical value.

### Question 39

#### 5.4 Does the additional information for code Z provide greater clarity?

Table 39: Responses to Question 39

Response category	Response total	Response percent
Yes	42	76.36%
No	8	14.55%
Not sure	5	9.09%

Total responses (n): 55

Among those who answered Yes, the most frequently raised themes were:

- Respondents welcomed clarification where Code Z is applicable, noting improved technical accuracy.

Among those who answered No or Not sure, the most frequently raised themes were:

- A number of respondents stated they were unfamiliar with the code, suggesting limited practical relevance

### Question 40

#### 5.5 Does the additional information for code # provide greater clarity?

Table 40: Responses to Question 40

Response category	Response total	Response percent
Yes	41	74.55%
No	7	12.73%
Not sure	7	12.73%

Total responses (n): 55

Among those who answered Yes, the most frequently raised themes were:

- Respondents felt clearer explanation supports technical completeness of the framework.

Among those who answered No or Not sure, the most frequently raised themes were:

- Some contributors expressed uncertainty about when and why the code would be used, suggesting a need for clearer exemplification.

## **Question 41**

**6 What, in your opinion, would be the likely effects of the revised attendance codes on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.**

**Do you think that there are opportunities to promote any positive effects?**

**Do you think that there are opportunities to mitigate any adverse effects?**

**Total responses (n): 59**

Responses to Question 41 indicated a strong consensus that the revised attendance codes are unlikely to have a direct impact on the Welsh language. Most respondents viewed the changes as technical and administrative, focused on attendance recording rather than language use.

Where views were expressed, respondents generally felt that the proposals neither promote nor inhibit opportunities to use Welsh, provided that implementation is consistent across Welsh-medium and English-medium settings. Several respondents explicitly stated that they anticipated no impact on the Welsh language.

A smaller number of respondents noted that any potential effects would be indirect, depending largely on how the guidance and supporting materials are implemented. In particular, concerns were raised about the accuracy and quality of Welsh-language versions of the guidance, with some respondents highlighting errors or inconsistencies observed during the consultation process. These respondents emphasised that poor-quality translation could risk Welsh being treated less favourably in practice.

Overall, responses suggested that the substance of the attendance code changes themselves was not seen as linguistically significant, but that implementation quality would be key to avoiding unintended effects.

## Question 42

**7 In your opinion, could the proposed policy be formulated or changed so as to:**

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

**Total responses (n): 58**

Responses to Question 42 focused primarily on implementation rather than policy content. Where respondents identified opportunities, these centred on ensuring that all guidance, exemplification, and communications are fully bilingual, accurate, and published simultaneously in Welsh and English.

Several respondents suggested that providing Welsh-language exemplars, templates, and training materials could help promote confidence in the use of Welsh within attendance-related processes, particularly for schools, local authorities, and parents.

Some respondents also highlighted the importance of terminological consistency across Welsh-language education guidance, noting that inconsistent or unclear wording could undermine confidence and lead to uneven application.

However, many respondents again stated that they did not see the attendance code reforms as having any inherent linguistic impact, and therefore felt there were limited or no specific mitigation measures required, beyond good-quality bilingual implementation.

### **Question 43**

**8 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.**

**Total responses (n): 56**

Responses to Question 43 were broader in scope and often moved beyond Welsh-language considerations to raise cross-cutting concerns about the attendance reforms as a whole.

The most frequently raised issues included:

- concerns about increased workload and administrative burden for schools arising from the greater number and complexity of codes;
- the need for clear national exemplification and case studies to support consistent interpretation and application;
- requests for clearer guidance on safeguarding thresholds and escalation, particularly where certain codes are used repeatedly or for prolonged periods;
- concerns about how more granular attendance data may be interpreted, used, or potentially misused, including for accountability or inspection purposes;
- the need for clearer information on implementation, training, MIS readiness, and transition arrangements.

While these issues were not directly related to the Welsh language, some respondents noted that implementation challenges could indirectly affect consistency and confidence across both Welsh-medium and English-medium settings if not carefully managed.

## Welsh Government response

The Welsh Government would like to thank all those who took the time to contribute to this consultation. The views and evidence submitted have been invaluable in informing decisions on the proposed changes to school attendance codes.

As this is a summary report, it is not possible to reflect every individual comment or suggestion raised by respondents. All responses have been carefully reviewed, and the omission of specific points from this report should not be taken as an indication that they have been overlooked.

Analysis of the consultation responses indicates that there was overall support for the proposed changes to the school attendance codes in Wales. Around two-thirds (68%) of respondents agreed with most of the proposed changes.

Overall, respondents agreed that the changes improved clarity, strengthened consistency of application, and better reflected current educational practice, particularly through the expansion of additional information attached to individual codes and the further disaggregation of existing categories. Support was strongest among local authorities and schools, who broadly welcomed the clearer distinctions between attendance, approved educational activity and absence, while noting the importance of ongoing monitoring and further guidance in more complex areas such as online learning and alternative provision.

Three areas drew specific responses, suggesting amendments to the following proposals

- (1) online learning (C5 Code);
- (2) interviews (J1 Code); and
- (3) School Closures (Y1-Y5 Codes).

We have considered these responses and recommend making the following updates to the proposed attendance coding framework and guidance, as published as part of the consultation. An explanation is as follows:

Area	Consultation Position	Revised Position Following Consultation
<b>Online Learning</b>	Recorded under C5; this would have been an authorised absence	Now agreed to have online learning recognised as an approved educational activity which will be a present mark.  B1 -online learning which is an approved educational activity delivered by the local authority, with conditions on local authority oversight, reintegration, safeguarding, camera use, and ineligibility for exclusion-related cases

		<b>B2</b> –online learning which is an approved educational activity delivered via school led online learning provision but in conjunction with conditions on LA oversight, reintegration, safeguarding, camera use, and ineligibility for exclusion-related cases
<b>Interviews (J Code)</b>	J1 code this would have had a statistical meaning of authorised absence	<b>J1 amended to J</b> , confirming external interviews for further education are an approved educational activity which is a present mark.
<b>Y Codes (School Closures)</b>	Several sub-categories Y1, Y2, Y3, Y4 and Y5	<b>Amended to two categories Y1 and Y2</b> : representing partial closure (Y1) and full closure (Y2) of schools.

The introduction of the B1 code for online learning responds to consultation feedback, particularly from local authorities, that in a small number of exceptional cases online learning is being used as a short term, planned intervention where learners are unable to attend in person and where provision is actively commissioned, monitored and reviewed.

In the original consultation, we proposed that online learning of this nature should be recorded as an authorised absence. However, having considered the feedback received, we are now proposing that, where strict criteria are met, online learning provided by local authorities be coded as B1 and recognised as an approved educational activity which counts as a present mark.

The B2 code for online learning is proposed to distinguish between school-led online learning from local authority-led EOTAS provision, which would remain recorded under B1. School-led online learning will be coded B2.

Under the revised guidance, both forms of provision would be subject to the same expectations, with each case being considered via a local authority panel or advisory process. Taking this approach would ensure consistent oversight, safeguarding, and quality assurance, regardless of how the provision is delivered. In practice, both routes are coded as an approved educational activity tailored to meet individual learner needs and will therefore be recorded as attendance.

We are confident that this amendment ensures safeguarding remains paramount and reinforces the expectation of reintegration into face-to-face provision and that online learning should remain exceptional, time limited and subject to robust

safeguarding arrangements, rather than a routinely available option for schools. The amendment clarifies, in this context, online learning refers to provision that is tightly controlled and formally agreed by the school and/or local authority.

All changes have been approved by the Minister for Education and Welsh Language. The changes will be implemented ready for use from September 2026.