
Ymateb i Ymgynghoriad / Consultation Response

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Dyddiad / Date:	26.03.26
Pwnc / Subject:	Review of school attendance codes

Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality of education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Estyn welcomes the revised attendance coding guidance and recognises the significant progress it represents in improving clarity, consistency and safeguarding across the system. Overall, the guidance is clearer, more structured and more practical for schools to apply. The inclusion of detailed examples, particularly those showing when a code should and should not be used, supports greater consistency and reduces opportunities for misinterpretation.

However, several risks and ambiguities remain. These include safeguarding considerations, potential inconsistencies in how mental and physical health absences are coded, risks of normalising certain behaviours such as remote learning and part-time timetables, and the possibility of increased administrative burdens on schools. Several areas of the guidance would also benefit from greater national clarity to ensure that vulnerable learners are protected, that data remains meaningful, and that implementation is smooth across Wales.

We also highlight the importance of supporting schools through a carefully managed transition period. This includes ensuring compatibility with information-management systems, communicating changes clearly to parents and wider stakeholders, and providing guidance on how to analyse trends across the period when coding systems are evolving. Without this, there is a risk of misinterpretation by schools, local authorities and the media and the potential for inaccurate reporting.

Overall, Estyn supports the direction of travel and acknowledges that the revised guidance is robust and helpful. However, further refinement and national coordination are needed to mitigate risks, strengthen safeguarding, and ensure that attendance data remains reliable, comparable and meaningful.

Consultation questions

1. Present and late codes

Question 1

(1.1) Does the additional information for codes ^ provide greater clarity?

Yes

Supporting comments:

The updated explanation maintains the existing definition but provides clearer guidance on its use, helping to ensure greater consistency across schools. This strengthens safeguarding and better supports vulnerable pupils. However, it may be worth considering whether keeping the afternoon register open for 30 minutes remains necessary in all settings.

Question 2

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

Partly

Supporting comments:

It would be beneficial for there to be clearer guidance on what is classed as 'late' before registration closes, for example arriving more than ten minutes after the official start of the school day. Establishing a standard timeframe would support greater consistency across settings. However, we recognise the need for reasonable adjustments to be made for individual circumstances, including delays related to school or local-authority transport, particularly for vulnerable groups.

2. Approved education activity codes

Question 3

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

Yes

Supporting comments:

The additional information helps clarify the distinction between off-site supervised provision and remote learning, supporting more accurate and consistent coding. Robust attendance verification remains essential, particularly for vulnerable learners in alternative provisions, to ensure their safety and effective monitoring.

Question 4

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

No

Supporting comments:

The purpose of subdividing this code is not clearly articulated in the consultation, and as a result it risks creating unnecessary complexity and additional administrative burden for schools. This activity would be better retained as an approved educational

activity at the discretion of the headteacher. It may be helpful for the guidance to include examples to illustrate how this code should be applied in practice.

Question 5

(2.2.1). Does the additional information for codes P1 and P2 provide greater clarity?

No

Supporting comments:

The purpose of subdividing this code is not clearly articulated in the consultation, and as a result it risks creating unnecessary complexity and additional administrative burden for schools. This activity would be better retained as an approved educational activity at the discretion of the headteacher. It may be helpful for the guidance to include examples to illustrate how this code should be applied in practice.

Question 6

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

Yes

Supporting comments:

The clarification of expectations regarding supervision and the recording of attendance for transition arrangements is helpful and supports greater consistency across settings. Clear guidance in this area strengthens safeguarding and ensures that pupils, particularly those who are more vulnerable, are appropriately monitored during transition activities.

Question 7

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

Yes

Supporting comments:

The guidance clearly distinguishes between curriculum-based work experience and work-experience arrangements provided through alternative provision. This distinction is helpful in ensuring consistent recording and in supporting appropriate oversight of learners participating in different types of work-related placements.

3. Authorised absence codes

Question 8**(3.1) Do you agree with the decision to subdivide the C code?****Yes****Supporting comments:**

The revised guidance provides greater clarity and transparency, strengthening accountability for schools in relation to remote learning and flexi-schooling arrangements. These activities can disproportionately affect vulnerable groups of learners, so clearer expectations help ensure more consistent oversight and improved safeguarding.

Question 9**(3.1.1) Does the additional information for code C1 provide greater clarity?****No****Supporting comments:**

The additional information provides a degree of clarity, but there remains a risk of inconsistent application in practice. Clearer parameters and tighter descriptors would help mitigate this risk and support more consistent recording across settings.

Despite the expanded guidance, this code functions largely as the previous 'C' code and continues to operate as a broad "catch-all" category. This may increase the likelihood of maladministration and discretionary coding, particularly where schools face pressure to justify absence patterns.

Question 10**(3.1.2) Does the additional information for code C2 provide greater clarity?****Yes****Supporting comments:**

Although this is a useful code to track, it is not entirely clear whether it applies solely to artistic performance. As currently described, it could be interpreted as covering sporting performances as well. Clearer delineation within the guidance would help prevent inconsistent interpretation and ensure the code is applied as intended.

Question 11**(3.1.3) Does the additional information for code C3 provide greater clarity?****Yes**

Supporting comments:

The guidance provides greater clarity than currently. However, there is a risk that flexi-schooling may be used disproportionately for learners whose needs are not being fully met in mainstream schooling, particularly those experiencing anxiety or other non-physical barriers to attendance. Clearer guidance on the appropriate use of flexi-schooling would help ensure it is applied consistently, used only where suitable, and accompanied by robust safeguarding measures and support plans that safeguard learners' educational entitlement.

Question 12

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

Yes

Supporting comments:

The guidance is helpful, particularly the inclusion of the six-week review period for schools. This provides a clear framework for timely monitoring and ensures that provision for learners is reviewed regularly and consistently. It also strengthens safeguarding by reducing the likelihood of prolonged periods without appropriate oversight.

Question 13

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

No

Supporting comments:

Authorising absence for remote learning may compromise safeguarding for the most vulnerable learners. The guidance does not clarify how schools monitor whether children are accessing online learning (i.e. present or absent at home) or how provision is being monitored, nor does it outline timely follow-up arrangements similar to the six-week review in C4 guidance.

There is a risk this code inadvertently promotes remote learning as an alternative to school-based education. The guidance should stress that this code applies only in exceptional circumstances and should distinguish clearly between short-term and long-term remote provision, with separate codes to reflect this.

Question 14

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

Yes

Supporting comments:

The guidance provides appropriate detail on agreed family holidays and clearly emphasises that these should only be authorised in exceptional circumstances. It also includes thorough additional information, offering clear examples of when this code may be applied.

Question 15

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

Yes

Supporting comments:

We fully agree with the guidance; it is clear and well-structured, with useful examples that effectively illustrate how the code should be applied.

Question 16

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

No

Supporting comments:

While distinguishing between physical and mental health may be helpful, authorising absence specifically for mental-health-related reasons raises several concerns. Coding pupils' mental health in this way could risk breaches of confidentiality, as all school staff would be able to identify children absent for mental-health reasons. There is also a risk of further breaches if attendance information is inadvertently displayed in classrooms, potentially exposing sensitive information to peers.

Additionally, this approach may unintentionally stigmatise pupils by labelling them with mental-health issues before any formal diagnosis, and it could contribute to an inaccurate perception of rising mental-health needs if I2 data is misinterpreted. This may not reflect the true picture of pupil absence.

There is also the potential for increased administrative burden, as schools might feel obliged to seek medical evidence to justify coding decisions. The current guidance for I1 and I2 is helpful because it covers illness without requiring categories to be separated; differentiating between physical and mental health increases the risk of inconsistent application. Moreover, mental health may not always be recognised as an illness, and using I1 too broadly could inadvertently normalise absence. Finally, pupils often present with intertwined physical and mental health needs, making it difficult to code these separately with accuracy.

Question 17

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

No

Supporting comments:

See above

Question 18

(3.4.2) Does the additional information for code I2 provide greater clarity?

No

Supporting comments:

See above

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'?

Yes

Supporting comments:

The guidance is clear, and we anticipate the change will have only limited overall impact. However, it aligns more appropriately with authorised absence rather than approved educational activity.

Question 20

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

Yes

Supporting comments:

The guidance is clear and straightforward. It provides appropriate clarification on expectations and should be easy for schools to apply consistently.

Question 21

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

No

Supporting comments:

The guidance states that *“If a pupil arrives from a medical appointment within the period that the registers are still open, they should be marked with an L code as they are then deemed present.”* However, the proposed change to the M code is potentially confusing, as it relies more on the timing of arrival than on the nature of the absence itself. It is not necessarily fair for a pupil to receive a late mark when their lateness is due to attending a medical appointment, which is entirely beyond their control.

This issue also highlights the challenges introduced by dividing the I category. Coding whether a pupil is absent due to medical appointments or hospitalisation, especially when distinguishing between physical and mental-health needs is complex and may lead to inconsistency. There is a risk that the coding system becomes harder to interpret and administer, without adding meaningful clarity for schools or families.

Question 22**(3.7) Does the additional information for code S provide greater clarity?****Not sure****Supporting comments:**

The additional information provided is helpful. However, there remains significant inconsistency among providers in deciding when to allow study leave. It would be beneficial for the guidance to specify an appropriate point at which study leave may begin such as from the start of the formal exam timetable in early June onwards. Current practice varies greatly across the country, and clearer expectations would help ensure a more consistent approach.

Such guidance is particularly important for vulnerable learners who rely on the routine and stability of the school environment. Further clarity is also needed on the expectations for schools that do choose to offer study leave. For example, on-site provision should remain available for pupils who do not wish, or are not able, to take study leave. This would help ensure equitable access to support for all learners.

Question 23**(3.8) Does the additional information for code E provide greater clarity?****Yes****Supporting comments:**

The guidance provided is suitable. However, it may be worth considering whether exclusion codes should be separated into fixed-term and permanent categories. This distinction would improve the accuracy and usefulness of data analysis. For

example, a permanently excluded pupil is currently coded in the same way as a pupil receiving a fixed-term exclusion during the 15-day period before a governing body discipline committee meeting, and the subsequent 15-day period before a possible appeal panel. Differentiating these categories would provide clearer oversight and enable more precise monitoring of exclusion patterns.

Question 24

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

No

Supporting comments:

The guidance is helpful, but additional clarity would be beneficial. Schools would benefit from an annually updated list of days on which the R code may be used for religious observance. At present, the guidance on when schools should apply this code remains vague, leading to inconsistent practice.

Question 25

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

Yes

Supporting comments:

The guidance is clear and easy to understand, providing straightforward expectations for schools.

4. Unauthorised absence codes

Question 26

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

Yes

Supporting comments:

The 5-day clarification notice is helpful and will ensure schools are more proactive in following up N codes. This is essential for safeguarding, particularly for pupils who may be at risk, as it promotes timely checks and reduces the likelihood of unexplained absences going unnoticed.

Question 27

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

Yes

Supporting comments:

The use of examples is particularly helpful, as they provide clarity on how the guidance should be interpreted and applied in practice.

Question 28

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

Yes

Supporting comments:

Examples of where the code should not be used are particularly helpful, as they reduce ambiguity and support schools to avoid misapplication.

Question 29

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

Yes

Supporting comments:

The guidance is generally suitable. However, it may be worth considering whether allowing a full 30 minutes after the start of the school day before applying the U code is too long. A shorter threshold could encourage greater punctuality and ensure that attendance data more accurately reflects late arrivals, without compromising fairness or clarity for schools.

5. Not required to attend codes

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'?

Yes

Supporting comments:

Question 31

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

Yes

Supporting comments:

The guidance on informing the other school of a child's absence is helpful. Too often this communication does not happen in practice, and this creates a significant safeguarding risk for vulnerable children. Clear expectations around timely notification will support better coordination between schools and ensure that children's safety and wellbeing remain central.

Question 32

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

Yes

Supporting comments:

Question 33

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

Yes

Supporting comments:

This change improves understanding of the reasons for school closure. It will strengthen the accuracy of analysis and support clearer accountability for schools by ensuring that closure data is recorded consistently and transparently.

Question 34

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

Yes

Supporting comments:

Question 35

(5.3.2) Does the additional information for code Y2 provide greater clarity?

Yes

Supporting comments:

Question 36

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

Yes

Supporting comments:

Question 37

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

Yes

Supporting comments:

Question 38

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

Yes

Supporting comments:

Question 39

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

Yes

Supporting comments:

Question 40

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

Yes

Supporting comments:

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?

Supporting comments:

The revised attendance codes are technical in nature and relate specifically to the classification, recording and monitoring of pupil attendance. As such, they are unlikely to have any direct impact, positive or negative on opportunities for learners to use the Welsh language or on the equal treatment of Welsh and English within the education system. The proposals focus on improving data accuracy, strengthening safeguarding, and reflecting changes in educational provision, rather than altering language practices or affecting access to Welsh-medium or bilingual education.

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?**

Supporting comments:

Although the proposed revisions to the attendance codes are technical in nature and do not directly influence language use, there are opportunities within the supporting guidance and implementation arrangements to strengthen the positive impact on the Welsh language. Ensuring that all accompanying materials including definitions, case examples, training modules, and communication to schools are fully bilingual, available at the same time as the English versions and of equal quality would help reinforce the principle of not treating Welsh less favourably than English. This aligns with expectations that all statutory and non-statutory guidance is accessible and linguistically balanced across both languages.

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.

To what extent has Welsh Government considered providing guidance to relevant bodies on how to analyse attendance trends during the first few years of implementation? In particular, how should schools and local authorities compare historic codes with the new coding system to ensure accuracy and continuity in trend analysis?

To what extent has Welsh Government assessed the potential workload implications for school staff when implementing the new codes?

Has any thought been given to communicating the new attendance codes to all stakeholders—particularly parents and carers?

Whilst categorising absence is helpful, there is a risk that certain behaviours, such as remote learning or part-time timetables could become unintentionally normalised. Guidance may need to emphasise that such arrangements should remain exceptional.

How will Welsh Government work with information-management system providers to ensure a smooth transition, data compatibility and ongoing accuracy of attendance information?

How has Welsh Government considered the potential unintended consequences of collecting additional, more detailed data? For example: Could certain behaviours become normalised simply because they are now coded? Could the increased complexity drive schools toward unhelpful or overly bureaucratic attendance strategies?

What consideration has been given to the risk of misinterpretation of attendance trends by the media, for example, non-physical illness, particularly in comparison with other UK nations that may use different coding systems?

Anonymity

Responses to the consultation may be published. Your response will be anonymous. However, if you would like your name to be published alongside your response, please insert an x in the box.

I agree to my name being published alongside my response to this consultation.