
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	20.07.23
Pwnc / Subject:	Belonging, engaging and participating

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 education and training in Wales. This is primarily set out in the Tertiary Education and Research Act 2022 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 education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- 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 schools, all age schools, secondary 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:

- 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Estyn agrees that the draft guidance 'Belonging, engaging and participating' supports providers, parents, and carers to improve learner engagement and attendance. The guidance is comprehensive and clearly highlights best practice approaches that can be used by schools, PRUs and other EOTAS settings. It outlines the roles and responsibilities of providers, including school governors, in supporting learners with their attendance and contains helpful principles, focussed on understanding individual circumstances and needs.

The guidance includes important details regarding the steps local authority services and other partners should take when attendance issues escalate. We welcome the focus on the learner as central to its principles and the value of taking a collaborative approach. The emphasis on establishing purposeful relationships with families is welcomed. The principles of the draft guidance reflect Estyn's report 'Involving parents - Communication between schools and parents of school-aged children.'¹ The need to take a learner-based approach to engage pupils and support continued attendance was also highlighted in our work about 'Pupil registration practices' which also identified issues around the unintended consequences of target setting and the inaccurate use of codes.²

We feel that the guidance may be strengthened by including further information to clarify the readers' understanding in places, for example of 'certain characteristics', and by summarising all information relating to parents into one section. It may also be beneficial to consider displaying the information in a more accessible way, for example by using a visual format at times to make the document easier to read. In its current format, it is also less accessible to parents and learners.

Consultation questions

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	----------	--------------------------

Supporting comments

We think the draft guidance is a useful document that provides practical information to help improve learner engagement and attendance. The guidance is very clear about the responsibilities falling on local authorities to support attendance, responsibilities that might benefit from being collected in a specific annex. The guidance is less directive about the responsibilities of the health care system. Whilst reference is made to CAMHS etc, the language about the

¹ [Involving parents - Communication between schools and parents of school-aged children](#)

² [Pupil Registration Practices](#)

responsibilities of the health care system to provide support could be strengthened.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance includes clear reference to parents’ statutory responsibility for ensuring their children attend school. It contains detailed information on governing bodies’ responsibilities for learner attendance, with suitable links to statutory regulations.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance contains a useful overview of local authority responsibilities, and possible pathways of management and support. It refers to the support that is expected to be available and the routes to be taken to access the support.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance contains a helpful summary analysis of many of the possible contributing factors, including appropriate reference to learner’s experiences and / or circumstances. In addition, the guidance identifies groups of learners likely to be at higher risk of poor attendance. It may be beneficial to include reference in the list to the possibility that the provision a pupil attends may not meet their needs and may therefore be a reason for absence.

We do not feel that it is helpful to suggest that 95% attendance is considered to be ‘good attendance’ (page 6). Setting the bar at 95% attendance as the threshold for "good" can create a lower expectation for learners or individuals. It implies that as long

as they meet the minimum attendance requirement, they are performing well, even if they may not be fully engaged or actively participating in the learning process. This mindset may hinder personal growth and limit potential. We would suggest removing this reference and focus on other factors such as the quality of participation, academic achievements, and overall understanding of the subject matter. Simply focusing on attendance percentage ignores these crucial aspects.

Question 5 – Are learners with protected characteristics included?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance references ‘protected characteristics’ as a key risk factor. There is reference throughout the document to the protected characteristics, for example, when referring to race in relation to human rights, or gender in relation to counselling. For further clarity, the guidance may be strengthened by including further information on the characteristics referred to as ‘certain characteristics’ under the heading ‘The importance of good school attendance for all learners.’ Alternatively, the guidance could include a link to support readers’ understanding of these characteristics.

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

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance concisely states parents’ legal obligation under ‘Roles and Responsibilities’. The guidance encourages schools to develop strategies in partnership with learners and parents, emphasizing the importance and advantages of good attendance while addressing the possible implications of absence. It also suggests that schools work with parents to identify any potential reasons that could affect attendance and direct them to appropriate sources of support.

The guidance may be strengthened by summarising useful information from other sections, within this section, to support them with their statutory duty. This information could include the importance of two-way communication, for example. Links to relevant guidance may also be useful in this section, for example to the All

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

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance is clear. The sections on establishing a whole-school approach, developing relationships with families, and engaging with the wider community to support prevention align appropriately to the principles and approaches. The guidance is strengthened by its focus on the needs of the learner and on learner voice. Staff development is alluded to, but it is not clear how training will support schools to apply the principles. The draft guidance contains clear directives for schools and settings relating to formal absence management.

The Reduced Hours section is useful in helping schools and families to see this approach as a supportive measure. It is a lengthy document and includes a lot of prose. It may be beneficial to consider the use of infographics or displaying the information in a visual format at times to make the document easier to read.

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

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

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance brings together formal management of absence processes successfully and includes an inclusive approach to whole-system support for learners and families. It contains worthwhile links to statutory guidance as well as to good practice case studies. The approaches outlined highlight the factors that contribute to good attendance and direct schools to the value of a whole school approach, partnership working, cultivating a positive ethos, and providing an

engaging curriculum that meets learners' needs. In addition, it refers appropriately to the importance of building positive relationships with learners and families, and of identifying suitable support when needed.

The guidance contains a useful list of contributory factors that may impact on attendance. It makes appropriate reference to the roles and responsibilities of parents, schools and settings, and external partners, linking these to safeguarding duties and cultures. The guidance on early identification leading to support and focussed on health and well-being is a positive step. We feel the guidance reflects the principles of Curriculum for Wales well.

The signposting to other sources of support and information throughout the document is also a helpful addition.

The draft guidance is suitable for most of its intended audiences, especially schools and providers. It may be less engaging for parents. It is unclear how children and young people will engage with the guidance given the integral role of pupil participation.

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

1	<input type="checkbox"/>	2	<input type="checkbox"/>	3	<input type="checkbox"/>	4	<input checked="" type="checkbox"/>	5	<input type="checkbox"/>
---	--------------------------	---	--------------------------	---	--------------------------	---	-------------------------------------	---	--------------------------

Supporting comments

The draft guidance is useful for all intended audiences. It's encouraging to see all of the information and research around affecting positive attendance in one place, including all partners and organisations involved. There is clear alignment with Estyn's inspection process, evaluating how schools and settings manage attendance. This goes beyond looking at attendance data and includes a focus on the practice providers put in place for engaging pupils in their learning, supporting their additional needs and building effective relationships with families and external organisations.

We feel the document could be strengthened by having:

- a greater focus on the effects of trauma in the introductory section, ensuring schools understand the part they play in meeting the needs of their learners
- a greater focus on the link between good quality teaching and learner engagement and attendance
- considering the presentation of the final document, for example by using more visual information to enable ease of accessibility for all intended audiences
- creating user friendly versions for parents and pupils

- checking that EOTAS is used correctly throughout and not used as an umbrella term for any off-site provision arranged by schools
- including reference to the considerations of transport arrangements where this may be a possible cause for non-attendance especially for learners who attend Welsh language providers who have a higher proportion who use school transport.

It would also be worth noting the importance of transitions for pupils and families. This can be from home to school as mentioned, but also between provisions. Is there a clear enough steer to ensure that information is shared across providers when pupils transition from one setting or school to another?

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

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

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

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

- identifying the contributing factors that may impact on attendance?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance contains an extensive list of possible factors linked to poor attendance. However, every school and community is unique, and it is essential to tailor strategies to suit the specific needs and circumstances of the learners and their families. The guidance would be strengthened by including:

- reference to transport arrangements on possible non-attendance and ensuring that schools and PRUs provide clear information about transportation options available to learners, including bus routes, schedules, and any special arrangements.

- references to the importance of establishing clear and effective communication channels which should be established to inform parents and learners about any disruptions or changes in transportation services, such as delays or cancellations
- providing guidance on school placements to minimise excessive moves, such as providing stability and continuity for learners who have experienced frequent relocations or transfers, and considering the impact of these moves on their attendance

iii. signposting to further guidance and good practice?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance signposts readers to a suitable collection of additional guidance documents and online resources. The good practice case studies are especially useful to schools. In its current format, the guidance does not enable readers to easily access further guidance and good practice case studies.

iv. recording and analysis of attendance data?

Yes	<input type="checkbox"/>	No	✓	Not sure	<input type="checkbox"/>
------------	--------------------------	-----------	---	-----------------	--------------------------

Supporting comments

The draft guidance provides clear information on procedures and purposes related to recording and analysing attendance, including relevant reference to providers' safeguarding duties. The guidance states an expectation that schools plan carefully for any study leave. However, study leave (up to 15 days) allows for pupils to be subject to unsupervised absence for an extended period. It is not clear how schools should operate in relation to safeguarding pupils, particularly vulnerable pupils, during these periods.

The guidance could be strengthened by providing focusing on how schools should safeguard learners who are on study leave. For example by:

- establishing clear and open lines of communication between the school and learners on study leave. Provide learners with contact details of designated school staff who can be reached for support, guidance, or reporting any concerns.
- using online platforms and tools to offer virtual support services to learners.
- arranging a system of regular check-ins with learners during their study leave period
- provide guidelines for learners on how to identify and report any inappropriate or harmful online content

- ensuring that providers have well-defined policies and procedures in place for safeguarding learners during study leave.

v. family engagement and multi-agency support?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

The draft guidance includes suitable reference to the importance of family engagement and appropriate information regarding multi-agency working. The community schools' model is helpful. The guidance makes suitable reference to the role of staff such as attendance officers and family engagement officers and their benefits to schools. The guidance may be strengthened by including further guidance for/reference to, small and rural schools. In addition, it will be important for schools to identify how it will contact families to suit them best, for example, where there are language barriers or disabilities.

vi. formal absence management?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

This section is clear and is further strengthened by the inclusion of the EWS referral flow-chart.

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

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

Supporting comments

Changes to the definition to 10% from 20% better supports The Wellbeing of Future Generations Act, the four purposes of Curriculum for Wales and the framework for safeguarding children in Wales. Following the pandemic and its impact on attendance, a 10% alert may enable principles and approaches to be applied at an earlier point in time, mitigating against the adverse effect of prolonged absence on learners.

There may be an unintended consequence here and schools may choose to respond to absenteeism only on occasions when the 10% threshold is met. The guidance would be strengthened by noting that a school should respond immediately to a child's absence, even if they have never missed a day of school before. This:

- promotes safety
- prevents truancy
- maintains educational continuity
- supports effective communication and
- helps identify and address underlying issues.

It also ensures that the school can provide appropriate support and resources to the learner and maintain a positive and productive learning environment.

Consistent monitoring of absences, including those of learners who rarely miss school, helps identify patterns or potential issues that may require intervention. It allows the school to recognize if there is a recurring problem, such as health issues, transportation challenges, or difficulties adjusting to school. By addressing these issues early on, the school can provide appropriate support, resources, or referrals to ensure the student's continued well-being and academic success.

By altering the threshold, this is likely to have an impact on the demand for support from the Educational Welfare Service.

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

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

Supporting comments

We do not feel the draft guidance will have any specific effects on opportunities for people to use Welsh or on treating the Welsh language less favourably than English.

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

Supporting comments

No further comments

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

No further comments

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