



Department  
for Education

# **Modernising school attendance and admission registers and setting national thresholds for legal intervention**

**Government consultation response**

**August 2023**

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# Introduction

## Background

In June 2022, the Department launched a consultation seeking views on proposals to modernise the regulatory system for recording information in school attendance and admission registers, sharing data from registers and on thresholds to be included in the proposed national framework for the use of fixed penalty notices.

This document provides a summary of responses and the Government's response to the consultation.

## Who this was for

- All school staff, head teachers and governors in England (only proposal 1 applies to independent schools)
- Academy trusts
- Local authorities

## Consultation period

The consultation ran for 6 weeks from 17 June to 29 July 2022. Responses could be submitted via the Department's online consultation portal, or by email or post.

## Proposals

The consultation sought views on two proposals:

### **Proposal 1: a proposed replacement for the Education (Pupil Registration) (England) Regulations 2006 which govern the keeping of attendance and admission registers, access to and sharing of register data and the rules for granting leaves of absence.**

Background: The Government's vision for improving school attendance is for pupils, parents, schools, local authorities, and other partners to work together to prevent patterns of absence from developing. Where patterns of absence exist already, intervention should be early to understand the barriers to attendance and the right support provided to help the pupil return to school. Making this a reality requires accurate recording in schools' admission (the school roll) and attendance registers, but also timelier sharing of, and access to, that data across schools, local authorities, and Department for Education (The Department). The proposal to replace the current regulations is intended to ensure that the

correct information is recorded in registers, and the right people have access to data at the appropriate time.

The Department is grateful for the constructive and helpful comments received, and will proceed with Proposal 1, adapting its approach in various ways in response to the comments received, and to reflect the Government's intention to drive a 'support first' approach. These changes are described in the section on [question analysis](#). The Department will not proceed with requiring schools to record participation in remote education in the attendance register or requiring LA consent before a school deletes the name of a pupil with an education health and care plan from a school roll.

## **Proposal 2: the thresholds for the national framework for the use of fixed penalty notices for absence and excluded pupils being in public places during the first 5 days of an exclusion that the Government, intends to introduce, subject to Parliament.**

Background: Unauthorised absence from school is treated inconsistently between different areas. In early 2022, the Department consulted on replacing individual local authority codes of conduct for issuing fixed penalty notices with a national framework to improve consistency between local areas. The further June 2022 consultation sought views on the thresholds in that framework.

Proposal 2 was linked to the legislative provisions introduced in the Schools Bill last year, which did not proceed. The Government remains committed to improving the consistency of approach to fixed penalty notices and the responses received will help inform that work as it develops, including any future legislative change.

## **Methodology**

The consultation asked respondents twenty questions on these two proposals. One question asked about the potential equalities impacts of the proposals on those with different protected characteristics. Respondents were asked to indicate on a rating scale the extent to which they agreed or disagreed with key elements of the proposals, or the extent to which certain elements of the proposals were sufficient to achieve a particular objective. For proposal 1, a draft of the proposed new regulations was published alongside the consultation documents and respondents were invited to provide general comments on the draft and in particular on data sharing, the admission register and the attendance register. For proposal 2, respondents were invited to give a free text response in support of their answer on the rating scale. The equalities impact question only asked for a free text response.

Where respondents answered questions on a rating scale, this analysis covers the respondent type and the proportion of respondents selecting each option on the rating

scale. For sections where general comments were invited the analysis covers themes that were identified in the text responses.

All submitted responses were considered. For the free text responses, this document summarises the main points raised by respondents, after all responses were grouped into topics and themes. This summary is not intended to be an exhaustive record of all the points made and the absence of a particular issue does not indicate that it has been ignored.

Where respondents answered questions on a rating scale, answers have been included in the analysis and reported throughout this document. Where email responses provided general comments on the proposals these have been included in the analysis where points directly linked to the questions were made.

The consultation was not designed to be a representative survey. Respondents were self-selecting and as such the results cannot be generalised to a wider population.

## Summary of responses received

In response to the consultation, the Department received contributions from 1,773 respondents: 1,723 responses were received through Citizen Space, our online consultation platform, and 50 were received via email (3 of which responded in the format of our online consultation platform).

Online respondents chose which of the following categories best described their circumstances and 3 email responses have been assigned to the most relevant categories.

Which of the categories below best describe you?	Total	Percent
School employee	219	12
School governor or trustee	40	2
Multi-academy trust employee	75	4
Local authority employee	126	7
Other organisation or representative body <sup>1</sup>	53	3
Parent (and none of the above)	1117	65
Pupil	1	0.1
Interested member of the public	93	5
Not answered	2	0.1
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 1: Categories of respondents to the consultation**

The online respondents originated from 145 local authority areas, excluding 9% who did not provide details of the local authority area in which they live. The local authority areas from which the most responses were received were Essex (4% of respondents) and Hampshire (3% of respondents). Annex B presents full details of the number of respondents from each local authority area.

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<sup>1</sup> The respondents who selected other organisation or representative body were made up of charities, trade unions and representative bodies, parent and child's rights organisations and community interest companies. Annex A presents full details of the organisations who responded to the consultation.

## **Main findings from the consultation**

The responses to each proposal in the consultation are summarised below.

**Proposal 1: a proposed replacement for the Education (Pupil Registration) (England) Regulations 2006 which govern the keeping of attendance and admission registers, access to and sharing of register data and the rules for granting leaves of absence.**

### **Data Sharing**

#### **Questions 1-3**

##### **Keeping registers electronically**

92% of local authority employees and 85% of school and academy trust employees and governors or trustees strongly or somewhat agreed that admission and attendance registers should be kept electronically. 53% of parents strongly or somewhat disagreed.

##### **Access to school registers**

94% of local authority employees and 71% of school and academy trust employees and governors or trustees strongly or somewhat agreed that local authorities should have access to take extracts from the admission register and attendance register. In contrast 75% of parents strongly or somewhat disagreed.

##### **Informing the local authority when a pupil will miss, or has missed, 15 days to allow any appropriate alternative provision to be considered**

70% of local authority employees and 66% of school and academy trust employees and governors or trustees strongly or somewhat agreed that schools should make a 'sickness return' to the local authority. In contrast 58% of parents strongly or somewhat disagreed.

#### **Question 4 – General Comments**

The most common free text comments from respondents on data sharing were questions and concerns relating to how the data would be used, especially concerns that it would be used punitively. There were also comments on the need for guidance clarifying how data sharing will operate and general comments around barriers to pupils' attendance that went beyond recording of attendance in the register.

## **Admission Register**

### **Questions 5-7**

#### **Deletion of names of pupils certified by the school medical officer**

75% of local authority employees strongly or somewhat agreed to removing the ground for deletion where a pupil is certified as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age. School and academy trust employees and governors or trustees were divided in their view, with 37% strongly or somewhat agreeing, 39% strongly or somewhat disagreeing, and 25% neither agreeing nor disagreeing. 65% of parents strongly or somewhat disagreed.

#### **Deletion of names of pupils absent without permission or following failure to return after a leave of absence**

59% of local authority employees and 62% of school and academy trust employees and governors or trustees, strongly or somewhat agreed that a condition be added to grounds for deletion that allows a pupil's name to be removed where the school and local authority have located the pupil, but they have no reasonable grounds to believe the pupil will attend the school again. In contrast 63% of parents strongly or somewhat disagreed.

#### **Local authority consent before deletion of names of pupils with an education, health and care plan, child in need plan or child protection plan**

83% of local authority employees and 60% of school and academy trust employees and governors or trustees, strongly or somewhat agreed that where a pupil is subject to an Education, Health and Care Plan, a Child Protection Plan, or a Child in Need Plan, the consent of the local authority should be obtained before the pupil's name can be deleted from the admission register. In contrast 70% of parents strongly or somewhat disagreed.

### **Question 8 – General Comments**

The most common themes in free text comments about the admission register were concerns relating to infringement on parental rights if LA consent was needed before children with an education, health and care plan (EHCP), a child protection plan (CPP), or a child in need plan (CiNP) were removed from the school roll. There were comments on the need for clear guidance for deletion from roll to ensure vulnerable children would not be off-rolled, and general comments around barriers to pupils' attendance that commonly went beyond the scope of admission register.



## **Attendance register**

### **Questions 9-15**

#### **Simplifying recording in the attendance register to a single list of reasons for a pupil 'attending' or being 'absent'**

70% of local authority employees and 73% of school and academy trust employees and governors or trustees, strongly or somewhat agreed that recording in the attendance register should be simplified. 50% of parents also strongly or somewhat agreed.

58% of local authority employees and 53% of school and academy trust employees and governors or trustees, viewed the categories in the draft new regulations as entirely or somewhat sufficient to capture all types of attendance and absence. By contrast, 61% of parents viewed them to be entirely or somewhat insufficient.

#### **Attendance and absence recording for pupils of non-compulsory school age**

84% of local authority employees and 61% of school and academy trust employee and governors or trustees, strongly or somewhat agreed that attendance should be recorded in the same way for all pupils, regardless of whether they are of compulsory school age or not. In contrast 81% of parents strongly or somewhat disagreed.

#### **Providing for recording remote education in the register in some circumstances where pupils do not attend**

87% of local authority employees and 72% of school and academy trust employees and governors or trustees strongly or somewhat agreed that remote education should be required to be recorded in the attendance register. 45% of parents strongly or somewhat agreed.

64% of local authority employees and 56% of school and academy trust employees and governors or trustees viewed that the definition for remote education was entirely or somewhat sufficient, with most answering that the proposal was only somewhat sufficient compared with entirely sufficient. 80% of parents viewed the definition to be entirely or somewhat insufficient or were unsure.

#### **Off-site approved educational activity**

89% of local authority employees and 62% of school and academy trust employees and governors or trustees strongly or somewhat agreed that the current definition of approved educational activity should be strengthened. 55% of parents strongly or somewhat disagreed.

72% of local authority employees and 56% of school and academy trust employees and governors or trustees viewed that that the proposed definition consulted on was entirely or somewhat sufficient. 84% of parents viewed the proposed definition to be entirely or somewhat insufficient or were unsure.

## **Question 16 – General comments**

The most common themes in free text comments from respondents relating to the attendance register were concerns with the detail of, and current application of, the national attendance codes and that reasons for absence recorded in the register needed to be broader and more flexible to specifically cover more reasons for absence, such as mental ill health.

## **Proposal 2: the thresholds for the national framework for the use of fixed penalty notices for absence and excluded pupils being in public places during the first 5 days of an exclusion that the Government, intends to introduce, subject to Parliament.**

### **Questions 17-20**

#### **When a fixed penalty notice must be considered**

71% of local authority employees and 59% of school and academy trust employees and governors or trustees strongly or somewhat agreed with the proposed national thresholds for the circumstances in which a fixed penalty notice must be considered. In contrast 91% of parents strongly or somewhat disagreed.

#### **The maximum number of fixed penalty notices that can be issued to each parent, per pupil**

72% of local authority employees strongly or somewhat agreed that a maximum of two fixed penalty notices should be issued to each parent, per pupil, per academic year.

Whilst 46% of school and academy trust employees and governors or trustees strongly or somewhat agreed, 64% of parents strongly or somewhat disagreed.

#### **Arrangements for co-ordination between those with authority to issue a fixed penalty notice**

86% of local authority employees and 75% of school and academy trust employees and governors or trustees strongly or somewhat agreed that any person issuing a fixed penalty notice should be required to check with the local authority first. 51% of parents strongly or somewhat agreed.

## Question analysis

This section provides a breakdown of the responses received for each question, summarises the main themes from the free text responses and sets out the Government's response.

### Proposal 1: Rewrite of the Education (Pupil Registration) (England) Regulations 2006

#### Data sharing from admission register and attendance register

##### Question 1: Do you agree that registers should be kept electronically?

Option	Total	Percent
Strongly agree	493	29%
Somewhat agree	318	18%
Neither agree nor disagree	216	13%
Somewhat disagree	161	9%
Strongly disagree	535	31%
No rating scale response recorded	3	0.2%
<b>Total</b>	<b>1726</b>	<b>100%</b>

Table 2: Question 1

Overall, 47% of respondents strongly or somewhat agreed that registers should be kept electronically, 13% neither agreed nor disagreed and 40% somewhat or strongly disagreed. When broken down by respondent groups, 85% of schools and academy trust employees and governors or trustees, and 92% of local authority employees strongly or somewhat agreed whereas 53% of parents somewhat or strongly disagreed.

Respondents who agreed mentioned concerns relating to how the data might be used and data security. Those who disagreed also mentioned data usage concerns, including that the data could potentially be used punitively.

**Question 2: Do you agree that local authorities should have access and be able to take extracts from the admission register and attendance register of all schools to enable them to carry out their statutory functions?**

Option	Total	Percent
Strongly agree	320	19%
Somewhat agree	281	16%
Neither agree nor disagree	111	6%
Somewhat disagree	227	13%
Strongly disagree	782	45%
No rating scale response recorded	5	0.3%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 3: Question 2**

Overall, 58% of respondents either strongly or somewhat disagreed that local authorities should have access to school registers. There was significant variation when this was broken down by respondent groups: 94% of local authority employees and 71% of school and academy trust employees and governors or trustees strongly or somewhat agreed.

In contrast, 75% of parents strongly or somewhat disagreed with the proposal.

Respondents who agreed mentioned the need for greater consistency in recording attendance and what data is shared between schools and local authorities. Those who disagreed mentioned concerns with sharing data about individual pupils, including worries that this could potentially infringe upon parental rights.

Other directly relevant themes from free text responses were the need for clear guidance regarding data sharing and what the data will be used for, and concerns that data could potentially be used punitively.

**Question 3: Do you agree that schools should make a ‘sickness return’ to inform their local authority when the authority should arrange alternative education for one of their pupils?**

Option	Total	Percent
Strongly agree	324	19%
Somewhat agree	381	22%
Neither agree nor disagree	215	13%
Somewhat disagree	203	12%
Strongly disagree	595	35%
No rating scale response recorded	8	0.5%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 4: Question 3**

Overall, 47% of respondents either strongly or somewhat disagreed that schools should make a ‘sickness return’ to the local authority, compared with 41% of respondents who strongly or somewhat agreed. When broken down by respondent groups, 70% of local authority employees and 66% of school and academy trust employees and governors or trustees strongly or somewhat agreed. Meanwhile, 58% of parents strongly or somewhat disagreed with the proposal.

Respondents who agreed had concerns around data security and therefore wanted to see clearer guidance around how the information would be used. Those who disagreed also mentioned data security, and concerns that the data might be used punitively rather than to help support families remove barriers to attendance.

Another common theme in the free text responses was the difficulty faced by local authorities in discharging their duty under section 19 of the Education Act 1996 to arrange alternative provision because of demand.

**Question 4: Do you have any comments regarding data sharing?**

The most common theme mentioned in free text responses was general concerns around how the data would be used. This included comments from a group of respondents, usually parents, who did not think that any attendance data should be shared at all.

The most common themes mentioned by local authorities and schools were that guidance on how data sharing will operate needs to be as clear as possible, and general concerns around data usage and who will have access to this data.

*I am concerned as to how many people would have access to this school data. There should be just a couple of people from the LA who would be named to have access. There should also be an inventory of who has had access and of what information they have retrieved (audit trail). **School Employee***

Most comments relating to clarity on how the proposal regarding the sickness return would work in practice were from local authorities, with some respondents commenting that informing the local authority should not be viewed as the end of the school's responsibility.

The most common themes mentioned by parents were data sharing concerns. For example, respondents referred to concerns around data security and fears that the data would be used punitively. Some respondents were concerned about potential data breaches and others felt that the data should only be shared in the interests of the pupil.

*Providing the data is used legally and in accordance with the reasons it was collected for (and not sold to third parties), then there is no reason why the data cannot be shared centrally. **Parent***

Parents also highlighted the need for more support for those who face barriers to attendance, including where a child has SEND or mental ill health.

## **Government response to views on questions 1-4**

The Government's vision for improving school attendance is for pupils, parents, schools, local authorities, and other partners to work together to prevent patterns of absence from becoming persistent or severe. In May 2022 the Department published new guidance '[Working together to improve school attendance](#)' which set out our expectations on schools and local partners working together to successfully treat the root cause of absence and remove barriers to attendance, at home, in school or more broadly.

Early identification that a pupil is struggling with their attendance is key to the success of this approach. As such, the **proposals around access to attendance and admission register data** remain important in identifying pupils who need support, understanding the reasons behind their absence and putting the right support in place as soon as possible. The Government welcomes the broad agreement to the proposals in questions 1-4 from employees of local authorities, schools and academy trusts, and governors and trustees. The Government accepts their suggestions, including the importance of clear guidance about how data will be used.

The Government also recognises that most parents responding disagreed with the proposals and has listened carefully to their concerns around how data will be used and kept secure.

Data sharing between schools and local authorities has long been a feature of the attendance system to help identify and target support. These proposals do not extend the fields of information collected but are aiming to standardise access arrangements across all types of schools. Furthermore, any access or extract permitted under the new regulations will still be required to comply with data protection legislation.

To facilitate more accurate recording and sharing of information and following the strong support from school, academy trust and local authority employees and from governors and trustees, the Government will proceed with the proposal to **require all schools to keep**

**their admission and attendance registers electronically.** The Government welcomed the recognition from some respondents that as well as improving accuracy of recording and making data analysis easier **allowing persons authorised by the regulations access to all school registers** will help to ensure and promote better early intervention and enable local partners to work together to prevent patterns of absence developing.

The Government is grateful to respondents for their comments and suggestions on the proposed **sickness return for pupils who have missed, or will miss, 15 days of school because of illness.** The Government’s intention is not for this to be used punitively. The law is clear that a parent cannot be punished for the absence of a child who was unable to attend because of sickness. Sickness returns are intended to ensure pupils who should be receiving support with their illness related absence receive it promptly because information is shared in a timely manner. The Government intends to proceed with replacing the existing non-statutory expectation for schools to make such returns with a legal obligation to do so. This will allow local authorities to more easily fulfil their legal duty, under section 19 of the Education Act 1996, to arrange suitable education for children of compulsory school age who would not otherwise receive suitable education.

The Government is grateful to all respondents for their comments, which will help to inform the final draft of the new regulations.

## Admission Register

**Question 5: The current Education (Pupil Registration) (England) Regulations 2006 include a ground of deletion from the admission register where a pupil of compulsory school age is certified by the school medical officer to be unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age. Do you agree that this ground of deletion should be removed in the new regulations?**

Option	Total	Percent
Strongly agree	244	14%
Somewhat agree	198	12%
Neither agree nor disagree	317	18%
Somewhat disagree	224	13%
Strongly disagree	729	42%
No rating scale response recorded	14	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

Table 5: Question 5

Overall, 55% of respondents strongly or somewhat disagreed with removing the ground for deletion where a pupil is certified as unlikely to be in a fit state of health to attend school.

Breaking this down by respondent group, 75% of local authority employees strongly or somewhat agreed. 37% of school and academy trust employees and governors and trustees strongly or somewhat agreed, compared to 39% that strongly or somewhat disagreed. Meanwhile, 65% of parents strongly or somewhat disagreed with the proposed change.

Respondents who agreed recognised how the proposal would help support pupils facing barriers to attendance and help ensure pupil safeguarding by preventing pupils from being deleted from the roll when they should not be. Those who disagreed mentioned concerns that the proposal would be used punitively or to off-roll those with health needs which the Department understands can happen and the proposal is designed to prevent.

Other directly relevant themes in the free text responses were general support for the proposal and a concern, in some respondents' view, that the proposal infringes on parental rights.

**Question 6: Do you agree that another condition should be added to the grounds for deletion to allow a pupil's name to be deleted in the circumstances below?**

- Where the pupil has been absent without leave for ten school days after a leave of absence or has been absent for twenty school days without the absence being authorised,
- there is no reason to think the pupil is too ill to attend,
- the school and local authority have succeeded in finding out the pupil's location and circumstances, after joint reasonable efforts, and
- they have no reasonable grounds to believe that the pupil will attend the school again.

Option	Total	Percent
Strongly agree	255	13%
Somewhat agree	250	15%
Neither agree nor disagree	281	16%
Somewhat disagree	228	13%
Strongly disagree	693	40%
No rating scale response recorded	19	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 6: Question 6**

Overall, 53% of all respondents strongly or somewhat disagreed with the proposal to add a new ground for deletion to the admissions register. Within the respondent groups, 59% of local authority employees and 62% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 63% of parents strongly or somewhat disagreed with the proposal.



Respondents who agreed mentioned the need for clear guidance on how the new ground should be used, and those who disagreed mentioned the potential for off-rolling.

Other directly relevant general comments covered broader points on deletion from roll, especially regarding the concern from some respondents that the proposed wording would make it more likely for vulnerable children to be taken off-roll.

**Question 7: Do you agree that where a pupil is the subject of an EHCP, CPP or CiNP the consent of the local authority (or the Secretary of State, if local authority consent is not given) should be obtained before the pupil’s name can be deleted from the admission register, and state in guidance that this should only be used to allow the relevant plans to be updated?**

Option	Total	Percent
Strongly agree	349	23%
Somewhat agree	228	13%
Neither agree nor disagree	152	9%
Somewhat disagree	140	8%
Strongly disagree	847	49%
No rating scale response recorded	10	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 7: Question 7**

Overall, 57% of respondents strongly or somewhat disagreed with the proposal that where a pupil is the subject of an Education, Health and Care Plan, CPP or CiNP local authority consent should be required before the pupil’s name is deleted. By respondent group, 83% of local authority employees and 60% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 70% of parents strongly or somewhat disagreed with the proposal.

Respondents who agreed mentioned the need for clear guidance on how the proposal would operate in practice and for flexibility for individual circumstances to be built into the proposal. Those who disagreed mentioned concerns about delays to their child coming off-roll and the importance of parents being able to decide whether to remove their child from the school to electively home educate them.

Some respondents, especially parents, also felt that the change was not needed.

**Question 8: Do you have any comments regarding the admission register?**

The most common themes mentioned in free text responses from parents were concerns around the proposed change to deletion from roll for pupils with Education, Health and Care Plans, Child in Need or Child Protection Plans and the potential for infringement of parents’ right to decide how best to educate their child in line with section 7 of the Education Act

1996. The importance of addressing the barriers to attendance and providing support for vulnerable children were also regularly raised.

*Non attendance is a complex issue which requires in depth knowledge of a pupil's situation. Only the school and the child's parents can know a child well enough to make these decisions. **Parent***

Local authorities and schools were generally in favour of the proposal, and their comments focused on how best to make the policy work in practice. The most common themes mentioned by local authorities and schools were that guidance around the proposal would need to be as clear as possible.

Comments were also made around the proposed change to deletion from roll where a pupil has failed to return from a leave of absence, but the pupil has been located and school and local authority do not have reasonable grounds to believe they will return. These included concerns from some respondents around the potential for off-rolling if it was not clear that all of the conditions in the draft new regulations had to be met before a pupil's name is deleted.

*We agree with both of these proposals but strongly recommend that the Department make it clear within statutory guidance who or which team within the Local Authority would take these decisions to avoid confusion or delay, to ensure proportionate and compliance with legislation and guidance. **LA***

*Deletion from register needs to be monitored thoroughly to prevent any illegal off-rolling - removing a problem pupil from a school. **MAT***

## **Government response to views on questions 5-8**

The Department welcomes the positive response from schools, trusts and local authorities to most of these proposals and the comments from all respondents on how best to make the proposals work in practice. The admission register underpins the key management information systems within schools and therefore must be as accurate as possible. The Government shares the concern of some respondents on off-rolling. It is imperative that a pupil's name is only deleted from the admission register under prescribed grounds. It is also important that the name of a pupil is not retained on the admission register when one of the grounds prescribed is met. These proposals, and related guidance, are designed to make that clearer to schools and local authorities.

The responses to the proposal in question 5 regarding **deletion of names of pupils certified by the school medical officer** suggest some misunderstanding amongst respondents about what would be achieved. Often those who disagreed with the proposal mentioned barriers to attendance and raised concerns that this would be used punitively to off-roll those pupils with health needs. Our proposed change however would mean that there were no longer any grounds for pupils to be deleted from roll simply because of ill health. The current ground for deletion dates from 1956 regulations and is outdated given

the changes to school staffing and provision for pupils with medical conditions since then. The law is clear that all pupils are entitled to a full-time education suitable to their individual needs, and many pupils now continue their education in their own school alongside appropriate support. Where a health condition prevents them from attending school, local authorities have a duty to make arrangements for alternative provision to ensure they continue to receive education. In many cases this support is provided alongside the pupil remaining on roll. For these reasons, the Government intends to proceed with removing this ground for deletion. The suggestions from respondents will help us to ensure the guidance around this is as effective as possible.

The Government notes the concerns from some respondents on the proposal around **deletion of names of pupils who have been absent without permission or not returned following a leave of absence** being applied inappropriately. The Department will work with schools and local authorities to further clarify the wording, and accompanying guidance, as the final version of regulations are developed.

The Government also acknowledges the concerns raised by parents who commented on the proposal in question 7 about **deletion of names of pupils with an Education, Health and Care Plan, children in need plan (CiNP) or child protection plan (CPP)**. The Government recognises the broad support of schools, trusts and local authorities who responded. The Government will reflect on the comments and suggestions and consider how best to protect the continuity of education for vulnerable children, but the Government does not intend to proceed with including this proposal in the replacement for the Education (Pupil Registration) (England) Regulations 2006 at this time, to allow for further policy development.

## Attendance Register

**Question 9: Do you agree that recording in the attendance register should be simplified as described in the proposal?**

Option	Total	Percent
Strongly agree	289	17%
Somewhat agree	427	25%
Neither agree nor disagree	260	15%
Somewhat disagree	223	13%
Strongly disagree	510	30%
No rating scale response recorded	17	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

Table 8: Question 9

Overall, 43% of respondents strongly or somewhat disagreed compared with 42% who strongly or somewhat agreed with the proposal. By respondent group, 70% of local authority employees and 73% school and academy trust employees and school governors or trustees strongly or somewhat agreed. 50% of respondents who were parents strongly or somewhat agreed with the proposal.

Respondents who agreed often mentioned the need for clear guidance on recording in the register, especially around recording illness.

Other directly relevant themes from the free text comments also covered use of, or changes to, the national attendance codes, for example introducing a new code for mental ill health to allow physical illness and mental ill health to be recorded separately.

**Question 10: Do the proposed categories in draft regulation 10(2)(a) and(b) sufficiently capture all types of attendance and absence?**

Option	Total	Percent
Entirely sufficient	112	6%
Somewhat sufficient	311	18%
Unsure	405	24%
Somewhat insufficient	327	19%
Entirely insufficient	544	32%
No rating scale response recorded	27	2%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 9: Question 10**

Overall, 51% of respondents answered that the proposed categories in the draft regulations were entirely or somewhat insufficient. 25% of respondents answered that the proposal was entirely or somewhat sufficient, and 24% were unsure.

By respondent group, 58% of local authorities and 53% of school and academy trust employees and school governors or trustees answered that the proposal was somewhat or entirely sufficient. Conversely, 61% of parents answered entirely or somewhat insufficient.

Respondents who agreed often mentioned the need for consistency in recording of attendance, especially to help fulfil safeguarding duties. Those who disagreed often mentioned concerns that the way attendance and absence is recorded would be used to penalise pupils with health conditions and other barriers to attendance.

**Question 11: Do you agree that attendance should be recorded in the same way for all pupils (both compulsory and non-compulsory school age)?**

Option	Total	Percent
Strongly agree	302	18%
Somewhat agree	178	10%
Neither agree nor disagree	111	6%
Somewhat disagree	177	10%
Strongly disagree	945	55%
No rating scale response recorded	13	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 10: Question 11**

Overall, 65% of respondents strongly or somewhat disagreed with the proposal. By respondent group, 84% of local authority employees and 61% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 81% of parents strongly or somewhat disagreed with the proposal.

Respondents who agreed mentioned the need for consistency, especially to help fulfil safeguarding duties. Those who disagreed mentioned concerns that, in their view, the proposal could potentially be seen as infringing on parental rights not to send their children to school full-time before compulsory school age.

Other directly relevant themes from free text response included concern from some respondents that register data might be used punitively.

**Question 12: Do you agree that the new regulations should allow recording of approved remote education in the attendance register?**

Option	Total	Percent
Strongly agree	451	26%
Somewhat agree	487	28%
Neither agree nor disagree	177	10%
Somewhat disagree	143	8%
Strongly disagree	452	26%
No rating scale response recorded	16	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 11: Question 12**

Overall, 54% respondents strongly or somewhat agreed with the proposal. By respondent group, 87% of local authority employees and 72% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 45% of parents strongly or somewhat agreed with the proposal.

Respondents who agreed focused on the potential benefits of remote education to reintegrating or supporting pupils who face barriers to attendance as did those who disagreed. Respondents who disagreed mentioned concerns regarding balancing the potential benefits with the need to safeguard pupils and ensure they still receive the full-time education to which they are entitled.

Other directly relevant themes from free text responses included that the proposal does not go far enough, particularly in not requiring the recording of remote education for pupils absent because of illness; the need for guidance around the proposed change to be clear; and that success of the proposal would be determined by how effectively it is implemented by schools and local authorities.

**Question 13: Is the proposed definition of approved remote education (at draft regulation 10(9)) sufficient?**

Option	Total	Percent
Entirely sufficient	123	7%
Somewhat sufficient	380	22%
Unsure	471	27%
Somewhat insufficient	293	17%
Entirely insufficient	428	25%
No rating scale response recorded	31	2%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 12: Question 13**

Overall, 42% of respondents answered that the definition of approved remote education was somewhat or entirely insufficient and 27% of respondents answered that they were unsure.

By respondent group, 64% of local authority employees and 56% of school and academy trust employees and school governors and trustees answered that the definition was entirely or somewhat sufficient. 50% of parents answered that the proposed definition was insufficient and 30% were unsure.

Local authorities, schools and other organisations were clear in free text comments that the requirements for recording an approved session of remote education must be as tightly defined as possible to ensure the primacy of face-to-face education and to prevent misuse. Respondents were particularly concerned around misuse of the new code to cover up illegal exclusions. Respondents were also clear, that despite the perceived benefits of

remote education, any proposal should only be enacted when all the safeguarding concerns have been fully considered and the right solution agreed upon.

Respondents who agreed mentioned the potential benefits of remote education for reintegrating and supporting pupils facing barriers to attendance as did those who disagreed. Respondents who disagreed mentioned concerns regarding safeguarding of pupils participating in sessions remotely and the potential to exacerbate existing problems with pupils illegally excluded from the classroom or receiving less than the full-time education to which they are entitled.

Other directly relevant themes included concern that the proposal does not go far enough to make use of the new technology, for example online education platforms, and that the proposed definition is too narrow, particularly in not including pupils absent due to illness. There were also comments that guidance around implementation of the proposal must be clear and that success of the proposal would depend on effective implementation.

**Question 14: Do you agree that the definition of an approved educational activity should be strengthened?**

Option	Total	Percent
Strongly agree	303	18%
Somewhat agree	324	19%
Neither agree nor disagree	300	17%
Somewhat disagree	215	13%
Strongly disagree	555	32%
No rating scale response recorded	29	2%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 13: Question 14**

Overall, 45% of respondents strongly or somewhat disagreed with the proposal, 37% somewhat or strongly agreed and 17% neither agreed nor disagreed.

By respondent group, 89% of local authority employees and 62% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 55% of parents strongly or somewhat disagreed with the proposal.

Respondents who agreed mentioned the importance of consistency of recording the attendance of pupils attending an approved educational activity. Those who disagreed mentioned the need for greater flexibility in the guidance and regulations than the proposed text would allow.

Some respondents also felt that the proposal does not go far enough in specifying what supervision and safeguarding must be in place for activities recorded in this category and that any guidance around the proposal must be clear.

**Question 15: Is the proposed definition of an approved educational activity at draft regulation 10(8) sufficient?**

Option	Total	Percent
Entirely sufficient	143	8%
Somewhat sufficient	319	19%
Unsure	504	29%
Somewhat insufficient	273	16%
Entirely insufficient	441	26%
No rating scale response recorded	46	3%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 14: Question 15**

Overall, 42% of respondents answered that the proposed wording was entirely or somewhat insufficient, and 29% answered that they were unsure. By respondent group, 72% of local authority employees and 56% of school and academy trust employees and school governors or trustees answered that the proposal was entirely or somewhat sufficient. 51% of parents answered that the proposal was insufficient and 33% answered that they were unsure.

Respondents who answered that the definition was sufficient mentioned the benefits it could have in improving the consistency of recording this category, and those who answered it was insufficient mentioned the need for the definition of the category to be broader than the draft text.

**Question 16: Do you have any comments regarding the attendance register?**

The most common themes mentioned in free text responses were that the proposals do not go far enough to improve the consistency of the way the national attendance and absence codes are used; and that other types of absence and attendance should be included in the national codes or regulations, for example a code for mental ill health.

Respondents from schools, local authorities and other organisations also commonly mentioned the need for clear guidance around recording in the attendance register and that the proposals did not allow enough flexibility to cover all the reasons that pupils may be attending or absent from school.

The proposal to record remote education in the attendance register was also a common theme. Respondents highlighted the importance of clear guidance, without which the new category could be used inconsistently which could potentially lead to safeguarding issues or illegal suspensions. Other respondents were concerned that the new category did not allow schools to record remote education when a pupil is too ill to attend school.



*I think the use of remote learning for purposes [of] illness (including mental health) should be considered, though I do understand this could be open to abuse. **Local authority***

*The agreement between proprietor and parent over supervision needs to be strengthened. What options are open for supervision and how is the safeguarding of the pupil protected. **Local authority***

The most common themes mentioned by parents were the need for greater clarity and consistency in recording of illness in the attendance register and concerns around the potential safeguarding implications of requiring remote education to be recorded in the register. Most comments referred to the codes recorded in cases of absence for pupils with SEND/mental ill health, in particular a perceived lack of flexibility.

*It is unclear what would be marked for school related anxiety, autism, adhd and other disability and would these children struggling to attend be penalised due to disabilities, appointments, mental health, autistic burnout. There is nothing for send children. **Parent***

## **Government response to views on questions 9-16**

Accurate and consistent recording is essential to an effective school attendance system and for supporting pupils to overcome barriers to attendance and benefit from the full-time education to which they are entitled.

The Government notes the need for clear guidance was often mentioned in regard to the proposal in questions 9 and 10 to simplify the attendance register, particularly around inconsistency in recording absence due to illness. Often those who disagreed were worried that pupils facing barriers to attendance (including those with special educational needs and disabilities) would be punished, and therefore thought that the existing categories for recording absence in the register should be broader. The Government intends to proceed with the proposed simplification of the register but, following respondents' views, the Government will explore options for further improving consistency in recording, including through mandating use of the national attendance and absence codes.

There appeared to be misunderstanding in responses to question 11 around recording attendance in the same way for all pupils, and concern that it infringed on parents' rights not to send their child to school before compulsory school age. The proposal is not intended to be used to enforce school attendance for children who are not of compulsory school age. Where a non-compulsory school age child is registered at school, they should be encouraged to attend, like any other pupil, to help establish good attendance habits. The Government recognises that some non-compulsory school age pupils do not attend school full-time and schools are able to record this in the attendance register. The proposal, with which the Government will now proceed, is instead designed to enable schools to better track attendance of all pupils, including those of non-compulsory school age so that support

can be provided where necessary. Legal action, including the use of fixed penalty notices and prosecution, cannot be taken against pupils of non-compulsory school age.

Although there was support of the proposal in question 12 to record remote education, there was uncertainty regarding the proposed definition in question 13. There were also concerns that the proposal did not go far enough to ensure effective safeguarding and around how to measure participation. The inclusion of pupils with barriers to attendance such as illness, was also raised. The Government acknowledges that valid points have been raised both for and against inclusion and therefore further consideration on recording remote education as attendance is needed. The Government does not intend to proceed with including remote education in the new regulations at this time. Schools should continue to follow the guidance ‘Providing remote education’ and can continue to keep a record of, and monitor pupils’ engagement with remote education, but this is not recorded in the attendance register.

The need for consistency was also often mentioned in support of the proposal in question 14 relating to supervision of an approved educational activity and the related proposal about the definition in question 15. The Government recognises that the current regulations do not define who a school can authorise to supervise an educational activity which has led to confusion and in some cases inappropriate recording. This proposal is intended to provide clarity as to who can supervise an approved educational activity. The Department will further consider the free text responses to this question, alongside our continued work with schools and local authorities, as we refine the definition for use in the final version of regulations.

## Proposal 2: Thresholds for the new framework for issuing fixed penalty notices

**Question 17: Do you agree with the national thresholds, as set out in the proposal, for the circumstances in which a fixed penalty notice must be covered?**

Option	Total	Percent
Strongly agree	215	13%
Somewhat agree	143	8%
Neither agree nor disagree	72	4%
Somewhat disagree	140	8%
Strongly disagree	1139	67%
No rating scale response recorded	17	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

Table 15: Question 17

Overall, 75% of respondents strongly or somewhat disagreed with the proposal. By respondent type, 71% of local authority employees and 59% school, academy trust employees and school governors or trustees strongly or somewhat agreed, whilst 91% of parents strongly or somewhat disagreed with the proposal. However, it was clear from comments that most respondents who disagreed were concerned with the use of fixed penalty notices in principle, rather than the specific proposal.

The most common themes mentioned by local authorities and schools were around the importance of addressing barriers to attendance, discretion remaining in the system to allow decisions based on individual circumstances, and comments around the cost of holidays.

*No point punishing the parents when they have done everything they can. You will drive pupil and parents to more mental health issues with this. Should be made easier to get EHCP and additional funding to support these children and their families. Attachment disorders will not be cured by fines or imprisonment. **MAT, Somewhat disagree***

*This will improve consistency and fairness across the country. **Local authority employee, Strongly agree***

The most common themes mentioned by parents were disagreement with the principle of fixed penalty notices in general, and comments around the barriers pupils face to attend school.

*Pupil absence is often complicated and support from services is woefully insufficient. Punitive measures such as fining parents is not the answer and will often put more pressure on an already stressful situation. **Parent, Strongly disagree***

*Agreement that there should be a national guideline to prevent inequality across the nation. **Parent, Somewhat agree***

**Question 18: Do you agree that the maximum number of fixed penalty notices that can be issued to each parent, per pupil, should be 2 per academic year?**

Option	Total	Percent
Strongly agree	307	18%
Somewhat agree	189	11%
Neither agree nor disagree	256	15%
Somewhat disagree	143	8%
Strongly disagree	808	47%
No rating scale response recorded	23	1%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 16: Question 18**

Overall, 55% of respondents strongly or somewhat disagreed with the proposal. By respondent group, 72% of local authority employees and 46% of school and academy trust employees and school governors or trustees strongly or somewhat agreed. 64% of parents strongly or somewhat disagreed with the proposal.

The most common themes mentioned were disagreement with the use of fixed penalty notices in general rather than the specific proposal, comments around the importance of understanding the barriers to attendance and providing support to reduce absence, and the importance of discretion remaining in the system to allow decisions to be made on individual circumstances.

**Question 19: Do you agree that any person with authority to issue a fixed penalty notice should be required to check with the local authority before issuing one in order to prevent the duplication of fixed penalty notices and to ensure that a fixed penalty notice is not issued when a prosecution for the particular offence is being considered?**

Option	Total	Percent
Strongly agree	671	39%
Somewhat agree	342	20%
Neither agree nor disagree	352	20%
Somewhat disagree	46	3%
Strongly disagree	285	17%
No rating scale response recorded	30	2%
<b>Total</b>	<b>1726</b>	<b>100%</b>

**Table 17: Question 19**

Overall, 59% of respondents strongly or somewhat agreed with the proposal. By respondent group, 86% of local authority employees and 75% of school, academy trust employees and school governors or trustees strongly or somewhat agreed. 51% of parents strongly or somewhat agreed.

The most common themes mentioned by parents were a complete disagreement with the principle of fixed penalty notices, comments around the barriers pupils face to attend school, and points around the need for consistency across schools and local authority areas.

## **Government response to views on questions 17-19**

The 'Working together to improve attendance' guidance is clear that in complex cases, local agencies working together to provide 'support first' is the right approach to tackle attendance problems. The guidance focuses on prevention and early intervention but where support to improve attendance is not appropriate (such as an unauthorised holiday in term time), not successful, or is not engaged with, it is right that the law protects a pupil's right to an education. In these circumstances, there is a role for the use of legal

intervention to secure a pupil's regular attendance. The Department notes the views from respondents who disagree with the principle of fixed penalty notices. Fixed penalty notices are a longstanding and important tool in improving attendance and removing them from the attendance system was not part of the proposal.

Instead, as responses recognised, legal intervention is currently used inconsistently across the country, with 22 local authorities accounting for over 50% of all fixed penalty notices issued in 2020-21. This proposal aims to improve consistency across areas. The Department remains committed to improving the consistency of local approaches to enforcement. Respondents' comments will help inform work as it develops, including any future legislative changes.

## **Public Sector Equality Duty**

### **Question 20: What do you consider to be the equalities impacts of the proposals on pupils, parents, groups of pupils or groups of parents who have or share each of the protected characteristics?**

Respondents were asked to give a free text response to this question. Respondents most commonly mentioned potential impacts on those pupils with disabilities and those suffering long term mental ill health. Some respondents made comments on specific groups of pupils and suggestions to help shape the proposals so they work for those groups going forward, for example:

*Disability must include neurodevelopmental disorders & children suffering trauma as they are often permanently excluded from mainstream & end up at SEN schools. They can then struggle to reintegrate and sustain their daily attendance.*

*Parents can work very hard to try to get them into school but the older & bigger the children get, the harder it is and can result in child to parent violence. These families often do not hit the thresholds or tick the right boxes that open the appropriate doors to support. These families should not be penalised. **MAT***

A smaller number of respondents mentioned potential impacts on pupils and/or parents because of their religion or belief, race, sex, pregnancy and maternity or age, sexual orientation, or gender reassignment.

*Celebrating religious festivals could be prohibited unfairly. **Parent***

*There were concerns that Traveller children and children from diverse backgrounds with families abroad would be more vulnerable to off-rolling and may become missing. For some colleagues, it was not just about protected characteristics but children are vulnerable for lots of reasons, and can be subject at any point in their childhood to educational neglect. Colleagues felt that the Department need to ensure schools provide LAs with information on protected characteristics. **Other organisation***

Across these numerous protected characteristics, and particularly disability, a key issue raised was that some groups have historically poorer attendance than others. There were concerns that fixed penalty notices and recording in the attendance register would not recognise this nor allow for flexibility in meeting individual needs. There was, therefore, a call for greater support for such pupils and parents to help overcome those barriers.

Impacts on pupils from economically disadvantaged backgrounds were also raised, although this is not a protected characteristic under the Equality Act 2010.

## **Government response to views on question 20**

The law entitles every child of compulsory school age to an efficient, full-time education suitable to their age, ability, aptitude, and any special educational need they may have. The barriers that prevent children attending school are wide and complex, both within and beyond the school gates, and are often specific to individual pupils and families. A key element of securing good attendance is therefore school being a calm, orderly, safe, and supportive environment where all pupils want to be and are keen and ready to learn.

The Department recognises that some pupils (including those with and without particular protected characteristics) face greater barriers to attendance than others. Equalities considerations have been at the forefront of the development of these proposals and the responses to this consultation have, informed our thinking. The Government has noted views from respondents on potential disproportionate impacts of the measures for pupils with certain protected characteristics, particularly pupils with disabilities (including some of those with special educational needs and disabilities and mental health conditions), pupils who may be more likely to experience bullying (for example because of a disability or their

sexual orientation), and concerns about pupils who are absent due to religious observance. It is the Department's view that the proposal will improve the individual and collective support available to such pupils to help overcome the barriers they face to attendance. The new regulations and accompanying guidance will improve consistency and accuracy of recording in the attendance register, which will enable schools, trusts and local authorities to spot patterns of poor attendance earlier and intervene to provide the support pupils need at an individual and cohort level to minimise their absences. The changes to data sharing and the admissions register, including tightening the grounds for deletion, will help to safeguard vulnerable children, and will improve the ability of schools and local authorities to support pupils back to full-time education.

The Government will reflect on consultation responses as the regulations and guidance develop, including ensuring guidance continues to be clear about the recording of sickness. This is intended to respond to the concern that vulnerable children, such as those with mental ill health, will be disproportionately impacted and penalised by the proposed changes. The decision to simplify the attendance register, including how this is presented in guidance, is intended to reduce confusion. Guidance will also reflect that head teachers should always consider individual circumstances when considering granting leaves of absence, and that absence on days set aside for religious observance must continue to be permitted.

This is an overview and not a comprehensive list of all the concerns raised in consultation responses. The Department has undertaken a full Equalities Assessment including taking into account responses received to this question. The Department also completed a Child's Rights Assessment and Families Test, including considering the possible impact for each protected characteristic. We believe the proposal will have a positive impact on eliminating discrimination in attendance processes, advancing equality of opportunity, and fostering good relations between those who do and do not share particular protected characteristics.

## **Annex A: List of organisations that responded to the consultation**

Academies Enterprise Trust

Access Dyslexia

Activate Learning

Acorn Academy

Airmed Psychology Limited

Alder Grange

Alderman Pounder Infant and Nursery School

All Hallows Catholic College

All Saints Church of England Academy

Ampney Crucis Church of England Primary School

Aquinas School

Attendance Provision

Arbor Education

Ark Schools

Association of Education Welfare Management

Association of Elective Home Education Professionals

Association of School and College Leavers

Astrea Academy Trust

Atlas Community Primary School

Aylesbury Grammar School

Ayresome Primary School

Barnardo's

Barnsley Metropolitan Borough Council



Bath and North East Somerset Council

Bedford Borough Council

Bedlington Academy

Ben Johnson Primary School

Bents Green School

Berwick Academy

Birkett House School

Birmingham City Council

Bishop King Primary School

Blackburn with Darwen Metropolitan Borough Council

Bosley St Mary's School

Bradford Academy

Bridgtown Primary School

Broadwas Church of England Voluntary Aided Primary School

Bushey Primary Education Federation

Bracknell Forest Council

Bristol City Council

Brunel Multi Academy Trust

Buckinghamshire Council

Burtonwood Community Primary School

Bury Grammar School

Bury Metropolitan Borough Council

Cabot Learning Federation

Caen Community Primary School

Callington Community College

Cambridgeshire County Council  
Canon Sharples Primary School  
Cardinal Wiseman Catholic School  
Castledon School  
Cardiff University School of Medicine  
Carlton Primary School  
Carlton Multi Academy Trust  
Castle Hill Community Primary School  
Cavendish Community Primary School  
Cecil Road Primary and Nursery School  
Central Bedfordshire Council  
Centre for Self Managed Learning Centre Spot  
Charters School  
Charter Schools Education Trust  
Cheddington Combined School  
Chelsea Community Hospital School  
Cherry Tree Hill Primary School  
Cheshire West and Chester Council  
Children's Commissioner for England  
Chilton Way Academy  
Chilvers Coton Primary School  
Christ Church Redhill Street Primary School  
City of Bradford Council  
City of York Council  
Clinically Vulnerable Families

Cognus on behalf of the London Borough of Sutton

Collective Vision Trust

Collingwood Primary Academy

Coop Academy

Clarice Cliff

Cumbria County Council

Defend Digital Me

Dene Magna School

Devon County Council

Digby Church of England Primary School

Dudley Metropolitan Borough Council

Durham County Council

East Midland Education Trust

East Riding of Yorkshire Council

East Sussex County Council

Education Otherwise

Education Welfare Limited

Edyourself

Ellingham Church of England Primary School

Elveden Church of England Primary Academy

Emersons Green Primary School

Ernesford Grange Community Academy

Essex County Council

Featherstone Primary School

Felsted Primary School

Fen Drayton Primary School  
Fir Ends Primary School  
Forest Bridge School  
Forge Valley School  
Fowey River Academy  
Framingham Earl High School  
Fulston Manor School  
Great Bradfords Infant and Nursery School  
Grow, Learn, Flourish Partnership  
Hampshire Parent Carer Forum  
Hamwic Education Trust  
Harwood Park School  
Hatfield Academy  
Heacham Schools  
Heltwate School  
Henry Tyndale School  
Herefordshire County Council  
Hertfordshire County Council  
Heybrook Primary and Nursery School  
Hollywell Primary School  
Hook with Warsash Academy  
Horizon Community College  
Horndean Technology College  
Hugh Christie School  
Iceni Academy

Ingol Community Primary School  
Integra School Education Welfare Service  
Keelman's Way School  
Kensington Aldridge Academy  
Kernow Learning  
Keystone Academy Trust  
Kirklees Metropolitan Borough Council  
Knowsley Metropolitan Borough Council  
Lancashire County Council  
Larkfields Infant School  
Laurel Lane Primary School  
Lawford Church of England Primary School  
Learn Academies Trust  
Leeds East Academy  
Leicester City Council  
Leicestershire County Council  
Leigh Academies Trust  
Lincolnshire County Council  
Lionheart Educational Trust  
Little Milton Church of England Primary School  
Liverpool City Council  
London Borough of Bromley  
London Borough of Merton  
London Borough of Newham  
London Borough of Redbridge

London Metropolitan University

Low Ash Primary School

Luton Primary School

Magnus Academy

Maidwell Primary School

Malton School

Manor Church of England Academy

Marches Academy Trust

Meadowhead School

Mellor St Mary Primary School

Merchants' Academy

Meridian Trust

Middlesborough Council

Midsomer Norton Schools Partnership

Milton Keynes Council

Montagu Academy

Mount Charles School

NASUWT – The Teachers' Union

National Association of Head Teachers

National Association for Hospital Education

National Association of Support Workers in Education

National Bargee Travellers Association

National Education Union

Nelson and Colne College

Netherton Church of England Primary School

Netherton Park Nursery School

Network for Legal Intervention in Education

Newcastle City Council

Newland School for Girls

Noble Education Services Limited

Norfolk County Council

Northamptonshire Hospital and Outreach Education Service

Northgate High School

Northumberland County Council

North Wingfield Primary and Nursery Academy

North Yorkshire County Council

Norton Hill Primary School

Not Fine in School

Nottingham City Council

Nottinghamshire County Council

Nun Monkton Primary School

Oakham School

Oaks Park High School

Oasis Academy Lister Park

Oasis Academy Trust

Odyssey Collaborative Trust

Omega Multi Academy Trust

Omnia Learning

Ormiston Sir Stanley Matthews Academy

Our Lady and St John Catholic College

Outwood Grange Academy Trust  
Oxfordshire County Council  
Oxfordshire Home Educators  
PACE Academy Trust  
Paddocks Primary School  
Parentkind  
Parkroyal Community School  
Parkside Community College  
Pear Tree Mead Academy  
Peterborough City Council  
Peterborough Keys Academy Trust  
Plaistow and Kirdford Primary School  
Plymouth City Council  
Plymstock School  
Priory Primary School  
Prospect – Education and Children’s Service Group  
Pucklechurch Primary School  
Range High School  
Ramridge Primary School  
Redhill Academy Trust  
Rivermead School  
River View Primary School  
Rotherham Metropolitan Borough Council  
Rowledge Primary School  
Ruskin High School



Rutland County Council

Saffron Walden County High School

Salford City Council

Sandwell Metropolitan Borough Council

SEND Crisis Liverpool

Senski

Sheffield City Council

Sheffield South East Trust

Shipley Church of England Primary School

Shirley Warren Primary and Nursery School

Sholing Infant School

Simply Education

Singleton Church of England Primary School

Smithdon High School

Solihull Metropolitan Borough Council

Somerhill School

SOS SEN

Southampton City Council

Southampton Hospital School

Southend on Sea City Council

South Gloucestershire Council

South Suffolk Learning Trust

Spring Meadow Primary School

Square Peg

Stag Lane Primary School and Nursery

Stanburn Primary School

St Agnes Church of England Primary School

St Bede's School

St Benedict's Catholic Primary School

St Hardulph's Church of England Primary School

St John the Baptist Catholic Multi Academy Trust

St Joseph the Worker Catholic Academy

St Mark's Church of England Primary School

St Mary's Catholic Primary School

St Mary's Church of England Academy Trust

St Mary's Church of England Voluntary Controlled Primary School

St Nicholas at Wade Church of England Primary School

St Oswald's Church of England Primary Academy

Stockport Metropolitan Borough Council

Stockport School

Stockton on Tees Borough Council

St Phillip Howard Catholic Primary School

Suffolk County Council

Summerswood Primary School

Swallowfield Lower School

Tameside Metropolitan Borough Council

Tany's Dell Primary School and Nursery

Teach My Child

TEACH Trust

Telford and Wrekin Council

The Beaconsfield School

The Bridge

The Buckingham School

The Centre for Personalised Education

The Chase School

The Corsham School

The Costwolds School

The Derby High School

The Dukeries Academy

The Freelance Creative

The Gateway Learning Community

The Grange Trust

The Hendreds Primary School

The Joseph Rowntree School

The Portsmouth Academy

The Primary First Trust

The Marches School

The Meadows Montessori School

The River Learning Trust

The Sutton Academy

The Willows Primary School

Thingwall Primary School

Thinking Schools Academy Trust

Thorley Hill Primary School

Thorpe Acre Junior School

Three Towers Alternative Provision Academy

Trentham Academy

Thrive Co-operative Learning Trust

Thornhill Primary School

Thurrock Council Tollgate Primary School

Trinity St Stephen's First School

Tunbridge Wells Speech Therapy

Tweedmouth Prior Park First School

Tyne Coast Academy Trust

Wadebridge School

Walsall Metropolitan Borough Council

Wirral Metropolitan Borough Council

Wakefield Council

Walgrave Primary School

Wam Youth

Warrington Metropolitan Borough Council

Warstones Primary School

Warwickshire County Council

Waveney Valley Trust

Westcountry Schools Trust

Westminster Primary Academy

Westover Primary School

Whitchurch Combined School

Whitmore Primary School and Nursery

Wigan Metropolitan Borough Council

Wiltshire County Council  
Windsor Nursery School  
Wirral Metropolitan Borough Council  
Wolverhampton City Council  
Woodville Schools Federation  
Worcestershire Children First  
Worcestershire County Council  
Wrangle Primary School  
United Learning Trust  
University of Chichester Academy Trust  
University of Winchester Academy Trust  
Urchfont Primary School  
Vale of York Academy  
Voyage Education Partnership  
Yew Tree Farm School

## **Annex B: List of respondents self-reported local authority areas**

Barking and Dagenham

Barnet

Barnsley

Bath and North East Somerset

Bedford

Bexley

Birmingham

Blackburn with Darwen

Blackpool

Bolton

Bournemouth

Bracknell Forest

Bradford

Brent

Bristol City of

Bromley

Buckinghamshire

Bury

Calderdale

Cambridgeshire

Camden

Central Bedfordshire

Cheshire East

Cheshire West and Chester

Cornwall

Coventry

Croydon

Cumbria

Darlington

Derby

Derbyshire

Devon

Doncaster

Dorset

Dudley

Durham

Ealing

East Riding of Yorkshire

East Sussex

Enfield

Essex

Gateshead

Gloucestershire

Greenwich

Halton

Hammersmith and Fulham

Hampshire

Haringey

Harrow  
Hartlepool  
Havering  
Herefordshire  
Hertfordshire  
Hillingdon  
Hounslow  
Isle of Wight  
Islington  
Kensington and Chelsea  
Kent  
Kingston upon Hull City of  
Kingston upon Thames  
Kirklees  
Knowsley  
Lambeth  
Lancashire  
Leeds  
Leicester  
Leicestershire  
Lewisham  
Lincolnshire  
Liverpool  
Luton  
Manchester



Medway  
Merton  
Middlesbrough  
Milton Keynes  
Newcastle upon Tyne  
Newham  
Norfolk  
North East Lincolnshire  
North Lincolnshire  
North Somerset  
North Tyneside  
North Yorkshire  
Northamptonshire  
Northumberland  
Nottingham  
Nottinghamshire  
Oldham  
Oxfordshire  
Peterborough  
Plymouth  
Poole  
Portsmouth  
Reading  
Redbridge  
Richmond upon Thames

Rochdale  
Rotherham  
Rutland  
Salford  
Sandwell  
Sefton  
Sheffield  
Shropshire  
Slough  
Solihull  
Somerset  
South Gloucestershire  
South Tyneside  
Southampton  
Southend-on-Sea  
Southwark  
St. Helens  
Staffordshire  
Stockport  
Stockton-on-Tees  
Stoke-on-Trent  
Suffolk  
Sunderland  
Surrey  
Sutton

Swindon  
Tameside  
Telford and Wrekin  
Thurrock  
Torbay  
Tower Hamlets  
Trafford  
Wakefield  
Walsall  
Waltham Forest  
Wandsworth  
Warrington  
Warwickshire  
West Berkshire  
West Sussex  
Westminster  
Wigan  
Wiltshire  
Windsor and Maidenhead  
Wirral  
Wokingham  
Wolverhampton  
Worcestershire  
York



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for Education

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