

By email: attendance.consultation@education.gov.uk

Monday 28 February

ADCS response to consultation on school attendance: improving consistency of support

The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the *Children Act (2004)*. The DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education. ADCS welcomes the opportunity to respond to the Department for Education's consultation on school attendance: improving consistency of support.

Proposal 1: Requiring schools to have an attendance policy, and have regard to statutory guidance on the expectations of schools, academy trusts and governing bodies of maintained schools on attendance management and improvement

ADCS broadly agrees with the proposal for schools to have an attendance policy alongside clear statutory guidance on attendance management and improvement. It is important that both school staff and parents understand the importance of regular attendance but also the support that can be offered if difficulties arise. Publishing timely guidance that includes examples of good practice will be helpful. It is important that schools are given sufficient time to implement these new proposals and we therefore welcome this commitment set out in the consultation.

ADCS would also welcome a clearer focus on the role of schools in tackling the underlying reasons for persistent absenteeism. Whilst Proposal 2 sets out the role of local authorities in supporting schools through their early help offer, there is a key role for individual schools and academy trusts to create a more inclusive environment that endeavours to cater to the needs of all children and young people. We know that children's mental health has been severely impacted over the past two years and this will have a long-term impact on absence. The roll out of mental health support teams in schools must be expanded to more areas and at pace to meet this growing need. Disadvantaged pupils (such as those eligible for free school meals) and those with special educational needs are also more likely to be persistently absent. It is important that within the published guidance is a greater focus and outline of the role of schools in promoting inclusivity and reducing school exclusions.

Persistent absence is strongly linked with fixed term or permanent exclusion. In secondary schools, the number of exclusions has continued to rise over the past decade alongside a year-on-year rise in the number of children being removed from mainstream school to become electively home educated. Addressing the reasons behind these rises, such as disincentives in the system for schools to become more inclusive environments will equally help address some of the underlying causes of persistent absence. For example, the growth of zero-tolerance policies in schools

can marginalise children who experience vulnerability. By contrast, other schools have acted as a safety net for families by seeking to 'poverty proof' the school day via the provision of uniforms, food and other forms of informal help and support to pupils and their families. ADCS would therefore welcome a greater emphasis on the importance of inclusive schools and for the Department to re-visit the recommendations made in the 2019 Timpson Review of School Exclusion.

It is positive that the consultation places an emphasis on partnership working across schools to share good practice. It is also important that schools can work together in partnership with the ability to access wrap around support from partners to address needs that enable children to attend school more regularly. This should also extend to schools working in partnership that are not within the same academy trust but are in the same area. The importance of place cannot be overstated and the local authority will also have a key role here.

Proposal 2: Introducing statutory guidance on the expectations of local authority attendance services

The minimum set of components for local authority attendance services seem reasonable and build upon the work that local authorities already do around supporting schools and partnership working. However, statutory guidance should include a clear expectation on all schools to work with the local authority in improving attendance. Further, local authorities should have access to attendance data for all schools in their area, regardless of governance. This will allow the authority to meet the needs of children who are known to children's services or may not yet be known. Maintaining a line of sight where there is risk is an essential part of fulfilling their statutory duties to protect children. Access to data can also be used to identify any possible weaknesses in local schools. As leaders of place, local authorities can offer immediate support through local knowledge and partnerships.

As detailed in the consultation document, the reasons for persistent absenteeism are often a symptom of wider issues in a child's life. Local authorities have a number of levers, powers and responsibilities which are not always linked. If the Department is to set minimum expectations of attendance services, this must be accompanied by adequate funding that signals the central role of local authorities in this space. The removal of the School Improvement Monitoring and Brokering Grant will impact many authorities' ability to carry out their duties effectively. The Grant is often used to fund local authority school improvement teams and its removal will have a negative effect on support provided to school leadership relating to attendance, exclusions, safeguarding and early help support. New expectations based on statutory guidance must therefore be accompanied by meaningful funding to allow local authorities to effectively fulfil their statutory role. ADCS urges government to fully fund any new expectations or duties at the nearest opportunity. Relying on the agreement of schools fora to de-delegate funding will not allow local authorities to provide the right support to all schools in their local area. Further, this relies on

strong consensus across schools which is not guaranteed, especially given the financial strain many schools are under.

ADCS welcomes the recognition of the importance of early help services in tackling persistent absenteeism. The sooner we are able to identify problems and provide the right support, the less likely they are to escalate and become entrenched. However, early help services have faced significant reductions to budgets as resources have been re-directed to protect the most vulnerable due to a decade of funding cuts. The Department must recognise the need for adequate, long-term funding for early help services. Since the beginning of the pandemic we have seen new families becoming known to these services which has placed additional strain on resources. Added to this, the long-term effects of the pandemic may result in higher rates of persistent absenteeism. Children have experienced social and emotional anxiety as well as loss of confidence due to time out of the classroom. This will result in a greater reliance upon early help support workers, working intensively with families, as is outlined in the consultation.

It is therefore essential that new statutory guidance is met with meaningful, long-term funding that reflects the context in which we are operating and allows us to be ambitious for children.

Proposal 3: A clearer more consistent national framework for the use of attendance legal intervention, including a new regulatory framework for issuing fixed penalty notices for absence

Introducing a new national framework for the use of attendance legal intervention will help bring consistency across local areas and trusts. ADCS welcomes the acknowledgement that supportive approaches should be explored first and the role of local authorities in coordinating neighbouring authorities and police. However, in setting a national framework, there must be room for flexibility where necessary as each local authority operates within its own context. As leaders of place, local authorities have a unique understanding of the challenges children and families face in their local area and this must be reflected in any regulatory framework.

If you would like to discuss any of the points raised in this consultation further, please contact ADCS via Matt.Cunningham@adcs.org.uk in the first instance.