



STUDENT ATTENDANCE POLICY

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1. PURPOSE

The Girls' Learning Trust ("the Trust") is committed to ensuring high levels of student attendance as a foundation for educational success, wellbeing, and safeguarding. This policy sets out how we promote, monitor, and improve student attendance in line with our mission to transform lives through girls' education. The policy is designed to:

- Ensure consistent implementation of statutory responsibilities across all Trust schools, in line with the Education Act 1996, DfE Working Together to Improve School Attendance (2022), and related statutory guidance.
- Align with the Trust's Education Mission and Public Sector Equality Duty, embedding a culture of attendance as everyone's responsibility and addressing barriers to regular attendance for all students.
- Guide schools in the development, review, and publication of key attendance-related documents, including attendance procedures, communication protocols, and intervention strategies.
- Clarify the roles and responsibilities of leaders, staff, students, and families in supporting strong attendance habits and reducing persistent absence.

2. DEFINITIONS AND IDENTIFICATION

In line with the Department for Education's *Working Together to Improve School Attendance* (2024), attendance refers to the presence of a registered student during the school day, while absence refers to any unauthorised or authorised period when a student is not attending.

Schools are legally required to record attendance twice daily (AM and PM registration) and to distinguish between authorised and unauthorised absences.

- Authorised absence includes illness, medical appointments, religious observance, or other reasons deemed acceptable by the Headteacher.
- Unauthorised absence refers to absences not approved by the school, including holidays during term time and unexplained or unjustified absence.

Persistent Absence

As per the DfE, a student is defined as a persistent absentee if their attendance falls below 90% over the academic year, regardless of whether the absences are authorised or unauthorised. Persistent absence is a key trigger for early intervention and targeted support, including multi-agency working where appropriate.

Severe Absence

The DfE defines severe absence as attendance below 50%. This is an acute threshold that may indicate serious underlying issues requiring urgent support and safeguarding consideration.

Vulnerable Groups and Disadvantage

The Trust recognises that some groups of students may be more vulnerable to attendance issues, including those with:

- Special Educational Needs or Disabilities (SEND)
- Experience of care or child protection plans
- Economic disadvantage or eligibility for free school meals
- Young carer responsibilities
- Mental and physical health difficulties

Attendance for these students should be monitored with particular care, and interventions should be tailored and supportive, not punitive.

School Refusal and Emotionally Based School Non-Attendance (EBSNA)

Emotionally Based School Non-Attendance (EBSNA) describes a pattern of absence where a student experiences high levels of emotional distress about attending school. EBSNA is often associated with anxiety, trauma, or unmet needs and requires a sensitive, multi-agency approach to assessment and support. This is sometimes also referred to as Emotionally Based School Avoidance (EBSA).

3. LEGISLATION AND GUIDANCE

This policy is informed by the following legislation and statutory guidance:

- Education Act 1996 – including parental duties and the legal requirement to attend school.
- Education (Pupil Registration) (England) Regulations 2006, as amended – including requirements for registration, authorised absence, and deletion from roll.
- School Attendance: Guidance for Schools (DfE, 2024) – statutory guidance on how schools should manage and improve attendance.
- Working Together to Improve School Attendance (DfE, 2024) – guidance for schools, academy trusts, and local authorities.
- Keeping Children Safe in Education (KCSIE) – for safeguarding considerations related to absence, including risks such as children missing education (CME).
- Children Missing Education: Statutory Guidance (DfE, 2016) – expectations for local authority and school coordination.
- Summary of responsibilities where a mental health issue is affecting attendance (DfE, 2023)
- Equality Act 2010 – including duties to make reasonable adjustments for students with disabilities or other protected characteristics.

This policy should be read in conjunction with the following Trust and school policies:

- School Student Attendance Procedure
- School Behaviour Policy
- School SEND Information Report
- Trust Education Development and Assurance Framework
- Trust Public Sector Equality Duty Statement
- Trust Safeguarding and Child Protection Policy
- Trust SEND Policy

4. ROLES AND RESPONSIBILITIES

Trust Board

The Trust Board holds overall accountability for student attendance across all Girls' Learning Trust schools. It ensures that statutory duties are fulfilled and that attendance is prioritised as a key element of safeguarding and educational success. The Board receives regular updates from the Chief Executive Officer (CEO), including analysis of attendance trends, persistent absence, and improvement actions. It approves the Trust-wide Attendance Policy and monitors its consistent implementation.

Chief Executive Officer (CEO)

The CEO provides strategic oversight of attendance across the Trust, ensuring that each school is supported and challenged to secure high levels of attendance and reduce persistent absence. The CEO leads on Trust-wide attendance improvement priorities, commissions external reviews where appropriate, and ensures attendance is embedded within broader strategic planning.

Local Governing Bodies (LGBs)

Each Local Governing Body is responsible for holding school leaders to account for student attendance, particularly for vulnerable groups. Governors receive termly reports from the Headteacher that include data on whole-school attendance, persistent absence, and the impact of intervention strategies. Each LGB must appoint a Link Governor for Attendance who meets regularly with the designated school lead and contributes to monitoring and evaluation activities.

Headteachers

Headteachers are responsible for the overall leadership and effectiveness of attendance management in their school. This includes setting a positive culture of attendance, ensuring early intervention and escalation procedures are in place, and overseeing the consistent application of the Attendance Policy. Headteachers are expected to ensure that attendance is regularly reviewed at senior leadership level and that all staff understand their role in promoting good attendance.

Attendance Champion

Each school must designate an Attendance Champion with responsibility for coordinating attendance systems and practice. This includes overseeing the monitoring of daily registers, identifying emerging concerns, liaising with families, and implementing intervention strategies. Attendance Champions ensure that legal processes (such as Fixed Penalty Notices or referrals to the local authority) are followed where required and that records are maintained in line with regulatory requirements.

Attendance Officers

Attendance Officers manage the day-to-day attendance procedures in their school. They monitor registers, follow up on absences, liaise with students and families, and maintain attendance data in line with policy and legal requirements. They support agreed interventions, prepare paperwork for referrals or legal action, and work closely with the Attendance Champion, DSL, SENCO, and Year Leaders. Their role is key to accurate record-keeping, effective communication, and escalation of complex cases.

Pastoral Staff, Form Tutors and Year Leaders

Pastoral staff, Form Tutors and Year Leaders play a crucial role in promoting attendance through early identification of concerns, family engagement, and case management of vulnerable students. They work closely with the Attendance Champion, DSL, and SENCO to address barriers to attendance and ensure a joined-up response to safeguarding and wellbeing.

Classroom Teachers

Teachers are expected to take an active role in promoting attendance by creating a welcoming and inclusive classroom environment. They support early identification of attendance patterns through daily registration and communication with pastoral leads. Teachers are also expected to contribute to discussions on individual students with attendance issues, providing insight into potential academic or social barriers.

Students

Students are expected to attend school regularly and punctually, engaging positively with their learning. They are encouraged to understand the value of attendance and to seek help when they are struggling to attend. Older students, particularly in Sixth Form, are supported to develop self-regulation and responsibility for their own attendance.

Parents and Carers

Parents and carers have a legal responsibility to ensure their child attends school regularly. They are expected to notify the school promptly about absences, attend meetings when concerns arise, and

work in partnership with staff to address any barriers. The Trust values strong communication and seeks to build positive relationships with families, recognising their vital role in securing high attendance.

4.1 Training and Continuous Improvement

All staff involved in attendance processes—teachers, pastoral leaders, and administrative teams—must receive appropriate training on:

- Attendance policy and statutory duties
- Use of attendance codes (where needed) and escalation procedures
- Communicating effectively with families
- Inclusive, trauma-informed attendance practices

Governors and Trustees should receive updates on attendance trends, actions taken, and the impact of interventions, to inform challenge and strategic support.

Link Governors for Attendance, in particular, should be provided with specific training for their role.

5. UNDERPINNING PRINCIPLES

The Trust is committed to building a culture in which high attendance is the norm and is recognised as central to safeguarding, student progress, and wider wellbeing. The following principles underpin the Trust’s strategic and operational approach to attendance across all schools.

i. Proven Impact of Positive Attendance

There is clear evidence linking regular school attendance with stronger educational outcomes, increased wellbeing, and improved life chances. Students with the highest attendance are significantly more likely to achieve higher grades, stay in education or training, and secure long-term employment. Good attendance is not only a statutory requirement but a protective factor that supports academic success and social inclusion.

ii. Shared Responsibility for Attendance

Improving attendance is a whole-school endeavour. Every member of staff—regardless of role—has a part to play in promoting, supporting, and sustaining good attendance. This includes senior leaders setting expectations and accountability structures, classroom teachers creating engaging and inclusive environments, and support staff maintaining positive daily routines. Students and families are key partners in this shared responsibility, with schools ensuring regular communication and visible leadership around the importance of attendance.

iii. Prevention and Proactive Identification

Attendance concerns must be identified and addressed early. Schools are expected to monitor data regularly (weekly and termly) and take preventative action well before thresholds for persistent absence are reached. Form tutors and pastoral staff should identify patterns of absence or punctuality that may indicate emerging issues, and initiate early support to prevent escalation. Attendance should be treated as an early indicator of wider unmet needs.

iv. Root-Cause, Relationship-Centred Support

Every intervention must be rooted in a genuine understanding of the reasons behind absence. Schools are expected to build trusting, non-judgemental relationships with families, using attendance conversations to identify and remove barriers—whether academic, emotional, medical, or social. Where necessary, schools should engage a wider team around the child (e.g. SENCO, DSL, Attendance Champion, external agencies) to ensure support is holistic, timely, and tailored.

v. Strategic Use of Attendance Data

Attendance must be tracked and analysed both at the individual and cohort level. Schools are required to maintain accurate, real-time registers and use their Management Information Systems (MIS) to analyse trends by year group, demographic group (e.g. FSM, SEND, EAL), and cause of absence. Attendance data should inform strategic planning, case management, governance reporting, and the evaluation of support strategies.

vi. High Expectations with Personalised Support

All students, regardless of background or need, should be expected and supported to attend school regularly. This includes students with chronic health conditions, social care involvement, SEND, or emotionally based school avoidance (EBSA). Schools must uphold high expectations but ensure adjustments and personalised pathways are in place where necessary. Attendance should not be viewed through a deficit lens but as an area where equity, wellbeing, and aspiration intersect.

vii. Clear, Consistent, and Inclusive Communication

Attendance must be communicated as a priority through regular, consistent messaging across the school year. Schools should use accessible language, a range of formats (e.g. website, newsletters, SMS), and targeted messages for at-risk families. Particular emphasis should be placed on key transition points—such as starting Year 7, joining Sixth Form, or returning after a period of absence. Attendance conversations should always be framed around support, not blame.

6. ATTENDANCE EXPECTATIONS

The Trust sets high expectations for student attendance, recognising its fundamental link to academic progress, personal development, and safeguarding. Attendance is monitored against clear thresholds to support early intervention, promote consistency across schools, and ensure every student is supported to achieve high levels of attendance.

The Trust uses the following thresholds to classify and respond to patterns of individual student attendance:

Attendance	Classification	Description
100% - 96%	Expected	Meets or exceeds Trust expectations for regular attendance.
95.9% - 95%	Satisfactory	Slight dip below optimal levels; continue to monitor and promote improvement.
Below 95%	Cause for Concern	Attendance requires monitoring; early intervention may be necessary.
Below 90%	Serious Cause for Concern	Defined as persistent absence; requires targeted intervention and support.
Below 50%	Severe Cause for Concern	Defined as severe absence; triggers safeguarding protocols and multi-agency action.

These classifications apply to all year groups and form part of the Trust's performance monitoring and reporting processes. Attendance data should be used to identify vulnerable groups, inform intervention planning, and track the impact of attendance improvement strategies over time.

Each school should set internal attendance targets—aligned with these thresholds and their local context. To fulfil the Public Sector Equality Duty and improve early intervention, schools must regularly analyse weekly and termly attendance data to identify student cohorts who require additional support. This includes (but is not limited to):

- Pupils with SEND
- Pupil Premium (PP) Students
- Pupils eligible for Free School Meals (FSM)
- Looked-after children and those with a social worker
- Pupils from ethnic or religious groups with historically lower attendance
- Pupils with health or mental health needs

Schools should use this analysis to set focused interventions and improvement strategies, benchmarking against Trust-wide, local, and national averages using tools such as DfE's View Your Education Data platform

7. SCHOOL REQUIREMENTS

7.1 School Student Attendance Procedures

In addition to applying the principles and responsibilities set out in this policy, each school must maintain and regularly review its own *Student Attendance Procedure*.

This school-level document should set out how the Trust's expectations are applied in context and must include:

- i. Roles and Responsibilities: a breakdown of internal staffing responsibilities related to attendance, including those of the Attendance Champion, form tutors, year leaders, pastoral staff, and administrative support.
- ii. School-Specific Attendance Targets: where appropriate, schools may set local attendance targets that exceed the Trust-wide thresholds, informed by baseline data, improvement priorities, and cohort needs.
- iii. Registration Procedures: clear guidance on how morning and afternoon registration is conducted, including responsibilities, timings, coding practices, and contingency arrangements for absences.
- iv. Reporting Procedures: clear expectations for how parents and carers should report absences, including the timescales for notifying the school, acceptable methods of communication (e.g. phone, email, online forms), and the information required. This section should also explain the process for following up unexplained absences.
- v. Monitoring of Punctuality: procedures for recording and responding to lateness, including when lateness is recorded as unauthorised (code U), escalation routes, and support offered to students and families.
- vi. Tiered Intervention Model: details of the steps taken at different stages of an intervention based on student attendance.

Schools must ensure that their local procedure remains consistent with this Trust policy and statutory requirements, and is made available to staff, governors, and parents in an accessible format.

7.2 School Websites

Schools must publish the following information on their websites, for students and parents:

- i. The Trust's Student Attendance Policy
- ii. The School Student Attendance Procedure
- iii. A link to the London Borough of Sutton Code of Conduct for Penalty Notices

7.3 Creating a Culture of Positive and Inclusive Attendance

Schools should build a culture where high attendance is the norm, valued by students and families, and supported through proactive communication and inclusive practice. This includes:

- Clearly communicate attendance expectations and procedures through accessible channels including school handbooks, websites, newsletters, and parent events. Ensure all materials are inclusive, culturally sensitive, and available in translation where needed.
- Provide timely and supportive engagement with families when attendance concerns arise, including first-day absence calls, follow-up meetings or home visits, and a consistent point of contact for attendance matters.
- Promote the link between attendance and student success—academic, social, and emotional—through assemblies, tutor time, and staff messaging, making attendance part of everyday dialogue and school culture.
- Celebrate and reward good or improving attendance in age-appropriate ways, and use awareness campaigns (e.g. Attendance Matters Week) to reinforce key messages throughout the year.
- Ensure key transitions—such as moving from primary to secondary, joining sixth form, or returning from a prolonged absence—are supported by clear expectations and consistent communication about attendance.

7.4 Designation of a Named Attendance Champion

Each school must appoint a member of staff (typically a member of the SLT) to act as the school Attendance Champion. The Attendance Champion must have sufficient capacity, training, and authority to:

- Oversee daily and termly attendance patterns.
- Analyse attendance data by group (e.g. SEND, FSM, EAL, year group, persistent absentees).
- Coordinate intervention plans and escalation routes.
- Ensure statutory processes are followed for persistent and severe absence.
- Liaise effectively with external partners including the Local Authority Attendance Service, social care, and educational welfare professionals.
- Contribute to school development planning and governance reporting.

7.5 Recording and Reporting Attendance

Each school within the Trust must implement robust, accurate, and compliant procedures for recording and reporting attendance. This includes:

- Complete twice-daily registers at the start of the morning and afternoon sessions in accordance with The Education (Pupil Registration) (England) Regulations 2006.
- Use DfE-compliant attendance codes to record every absence or part-day attendance, distinguishing clearly between authorised and unauthorised reasons.
- Ensure attendance data is recorded promptly, checked daily for anomalies, and that changes are traceable.
- Keep attendance registers and student absence records secure, up to date, and accessible for inspection or audit purposes.
- Maintain a robust process for deleting students from roll, ensuring it complies with legal criteria and local authority notification duties.

Monitoring and Reporting Attendance Data

- Track and analyse attendance weekly, half-termly, and termly at school level, with trends broken down by year group, vulnerable groups, and cause of absence.
- Set clear attendance targets for whole-school and priority groups and monitor against these throughout the year.
- Present termly attendance reports to the Local Governing Body (LGB) and share summary data with the Trust CEO for reporting at Trust Board. This should be done in the format set out in Appendix

One.

- Include analysis of attendance in self-evaluation reports (SEF) and school development plans (SDP) to embed it within whole-school planning.
- Share New Pupil and Deletion Returns, Attendance Returns, and Sickness Returns with the Local Authority.
- Automatically share data via their MIS with the DfE to comply with national expectations and access the “View Your Education Data” dashboard.

7.6 Definition of Authorised and Unauthorised Absence

The decision to authorise an absence rests with the school, under the overall responsibility of the Headteacher. While parents and carers may report a reason for absence, it is the school’s role to determine whether that reason meets the threshold for authorisation in line with statutory guidance and this Trust policy.

Schools must be proportionate in their requests for medical evidence. Where a parent cannot provide written evidence, a conversation with the parent or student (if appropriate) may be accepted as sufficient. Rigid documentation should not be demanded unless absolutely necessary, to avoid placing undue pressure on families and health services

Authorised Absence

Valid reasons for authorised absence include:

- Short-term sickness typically for up to three days, where the school is satisfied that the explanation is reasonable.
- Medical or dental appointments, where parents have been unable to arrange the appointment outside of school hours. Students should only be absent for the minimum time necessary to attend.
- Religious observance, for one day, where it is exclusively set apart by the religious body to which the family belongs (not the personal preference of the parent).
- Bereavement of a close family member, for a period of up to five school days, at the discretion of the Headteacher.
- Traveller pupils travelling for occupational purposes, including Roma, Gypsy, Irish or Scottish Traveller, Showpeople, and Bargee communities, where the school is satisfied that the absence is for occupational purposes and arrangements for education have been discussed.
- Leave authorised under exceptional circumstances, at the discretion of the Headteacher, including for example public performance licensing, participation in external exams, or attendance at a recognised educational opportunity.
- Funerals of close family members. This may include one day for travel, one day for the event itself, and one day for return travel or religious/cultural observance.
- Exclusion or suspension, where the student is not permitted to attend school for a fixed period.

Evidence for Authorisation

In some cases, schools may require additional evidence before authorising an absence. Where this is not provided, the absence may remain unauthorised and, if thresholds are met, may lead to further intervention, including referral to the local authority for potential enforcement action. Evidence may be requested in the following circumstances:

- Illness lasting three or more consecutive days, or repeated illness across a half-term, where medical evidence may include a GP appointment confirmation, prescription, or a note from a healthcare professional.
- Illness before or after a school holiday, where medical evidence may be requested to verify that absence was genuine and not related to unauthorised term-time holiday.
- Late return from travel abroad, where the school may request evidence (e.g. flight documentation)

to confirm that the absence was not avoidable.

Mental Health and Emotionally-Based School Non Attendance (EBSNA)

Mental health-related absence may be authorised where the school is satisfied that the student's emotional or psychological state prevents regular attendance. This includes cases where absence arises from clinically diagnosed conditions (e.g. anxiety, depression), or emerging wellbeing issues that significantly impair attendance and participation.

Schools should avoid requiring rigid documentation, such as medical notes, as the default. A reasonable explanation from the parent, a student conversation, or known wellbeing history may be sufficient—particularly for short-term absence (e.g. up to 3 days). This approach is supported by national guidance to reduce stress on families and NHS services.

Where mental health-related absence persists or escalates, schools should adopt a collaborative, multi-agency approach using the Assess–Plan–Do–Review cycle, engaging the student, family, SENCO, pastoral leads, and external professionals if needed. An individualised support or reintegration plan should be co-produced where absence becomes prolonged or emotionally-based.

Unauthorised Absence

Absence is unauthorised when:

- The school does not accept the reason provided.
- No reason is provided for the absence.
- Leave is taken without prior authorisation by the Headteacher.
- Evidence is requested but not provided in the required timeframe.

Where unauthorised absence reaches 10 sessions (5 days) in a 10-week period (excluding school holidays), the school may refer to the local authority for consideration of a Fixed Penalty Notice in line with section 8 of this policy.

Schools must apply these authorisation rules consistently, fairly, and with sensitivity to individual circumstances.

7.7 Implementation of the Common First Day Response

Prompt action on unexplained absences is a core safeguarding responsibility. All schools must:

- Attempt to contact the parent or carer by phone (or another agreed method) on the first day of any unexplained absence. This should be done before 11am and preferably within the first two hours of the school day, particularly for pupils known to be vulnerable or at risk of harm.
- Follow up with further contact attempts and, if necessary, conduct a home visit if no explanation is received and the student remains absent.
- Escalate concerns promptly to the Designated Safeguarding Lead (DSL) where there are welfare or safeguarding risks.
- Ensure that unexplained absences are investigated and re-coded with a valid reason within 5 working days, in line with DfE requirements.
- Keep a log of all contact attempts, outcomes, and any actions taken to locate the student or clarify the reason for absence.

These procedures apply to all students, including those with a pattern of irregular attendance. Where a student is subject to a child protection plan or identified as at risk, immediate escalation must occur on the first day of absence without explanation.

7.8 Implementation of a Clear Tiered Intervention Model

Each school must implement a tiered model of attendance support that combines whole-school promotion with targeted and intensive interventions. Each school will determine this locally in its *Student Attendance Procedure*, but an example of this would be:

Universal (Tier 1): Proactive promotion and prevention

- Build a culture of attendance through assemblies, tutor time, PSHE, and consistent messaging.
- Promote the link between attendance and success in attainment, wellbeing, and future opportunities.
- Celebrate good and improving attendance through certificates, rewards, and recognition.
- Ensure school staff model punctuality and a positive ethos around attendance.

Targeted (Tier 2): Early support and intervention

- Identify students approaching persistent absence (<95%) and initiate light-touch support (e.g. attendance mentoring, check-ins, phone calls home).
- Develop Attendance Action Plans or pastoral support plans with SMART goals and regular reviews.
- Involve families in co-developing plans and build positive, non-judgemental relationships.

Intensive (Tier 3): Escalation and safeguarding

For students whose attendance drops below 90% (persistent absence) or 50% (severe absence), initiate:

- Initiate multi-agency meetings, including completing an Early Help Assessment where appropriate.
- Conduct a risk assessment if there are safeguarding concerns, such as potential Children Missing Education (CME) or exploitation.
- Refer to social care or child protection services where attendance concerns are linked to safeguarding or welfare risks.

Schools must ensure that all escalation decisions are proportionate, evidence-based, well-documented, and clearly communicated to families, with appropriate opportunities for discussion and resolution.

7.9 Requests for Student Leave

The Trust recognises that there may be exceptional circumstances in which a parent or carer seeks permission for a student to be absent from school during term time. In line with national guidance, the default expectation is that leave of absence will not be granted unless the Headteacher is satisfied that the circumstances are genuinely exceptional.

All requests for leave must be made in writing to the Headteacher of the school by the parent/carers at least two school weeks in advance of the proposed absence, using the school's formal leave of absence request process.

If authorised, the absence should be recorded using the appropriate DfE attendance code. If unauthorised, the absence should be recorded as such, and the school may issue a Fixed Penalty Notice in accordance with local authority procedures.

7.10 Use of Part-Time Timetables

Part-time timetables must only be used in exceptional and time-limited circumstances. These should never be treated as a standard or long-term solution to attendance issues. Schools must:

- Ensure that part-time timetables are used solely to support a student's reintegration following illness, mental health difficulties, trauma, or complex SEND.
- Gain written consent from the parent/carers before a part-time timetable is implemented.
- Ensure the arrangement is agreed by the Attendance Champion and, where appropriate, the SENCO

- or Designated Safeguarding Lead.
- Set clear start and end dates, with defined targets for increasing time in school.
- Review the arrangement at least fortnightly to assess impact, safeguard the student, and ensure progression towards full-time attendance.
- Keep detailed records of the rationale, duration, and review outcomes, and notify the Local Authority if the arrangement exceeds 6 weeks.

8. USE OF PENALTY NOTICES

Penalty Notices are a statutory intervention used across the Trust in accordance with *Working Together to Improve School Attendance* (DfE, 2022) and Sutton County Council's *Code of Conduct for Penalty Notices* (effective August 2024). They are issued as an alternative to prosecution under Section 444 of the Education Act 1996.

When a Penalty Notice May Be Issued

Penalty Notices may be requested by schools when a student has had:

- 10 sessions (5 school days) of unauthorised absence in a 10 school-week period, coded as G (holiday), N (reason not known), O (unauthorised), or U (late after register closes).
- Seen in public during the first five days of an exclusion without school permission.
- Continued unauthorised absence during a Notice to Improve monitoring period.
- Persistent lateness after registers have closed (10 sessions within a 6 school-week period).

A Penalty Notice may be issued to each parent for each child. No more than two notices may be issued per child, per parent, in a rolling three-year period.

Pre-Conditions Before Requesting a Penalty Notice

Before requesting a Penalty Notice, schools must:

- Show that they have engaged the family and offered support (e.g. meetings, pastoral plans, SENCO input).
- Communicate clearly that a Penalty Notice could be issued.
- Use a Notice to Improve where appropriate unless previous efforts suggest this would not be effective.
- Submit a full record of interventions, correspondence, and attendance data to Surrey County Council within 3 weeks of the monitoring period ending.

The final decision to issue a Penalty Notice lies with the Local Authority.

Inclusion and Equity Considerations

Schools must ensure that:

- The decision is fair and non-discriminatory under the Equality Act 2010.
- Attendance issues linked to SEND, trauma, or hardship are fully considered.
- Legal enforcement is a proportionate and necessary response to improve attendance.

Communicating with Families

Parents must be made aware of the potential for Penalty Notices through school policies, attendance letters, and published information. Schools must ensure messaging is accessible, consistent, and aligned with this policy.

See the full London Borough of Sutton Code of Conduct for Penalty Notices here:

www.cognus.org.uk/services/attendance-support-team/attendance-support-for-professionals/attendance-support-in-schools/penalty-notices/