

# **Attendance Policy – Greenhill Academy**

Additional guidance for academies is available.

# **Document Control**

Description	By Whom	Date
Established	Tracey Mellor	13.12.15
Latest Review	Wendy May Chloe Glynn	Jul 23
Approved by Trustees	Anne Weinstock Chair of Trustees	July 23
Next Full Review due		July 24

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## Our attendance policy

# Aims and expectations

At Greenhill Academy, we expect all our pupils to:

- Attend every day
- Attend on time
- Attend ready to learn

Good **attendance** and **punctuality** is EVERYONE's responsibility. It is vital to making sure that children make good progress and have the best chances for success in life. Children have the right to a full education, broad and excellent education. Our partnerships with parents play a vital role in ensuring excellent attendance and punctuality are achieved.

# SCHOOL ATTENDANCE EVERY DAY COUNTS



There are 190 days in a school year which leaves 175 days to spend on family time, shopping, appointments and other things.



Having clear responsibilities, routines and expectations helps children to attend regularly. This policy aims to support children, families and staff to understand the routines we have to ensure good attendance and what can be done to support children to attend regularly.

Some of the words used in this policy (identified in bold) are explained in appendix 1

#### School Attendance and the Law

Under the 1996 Education Act, parents and carers are responsible for ensuring their children attend school regularly and punctually. A **register** must be taken at the start of the morning and afternoon session. This is a legal document and set codes are followed (see appendix 2)

By law, only schools can authorise absence. Parents / carers must let school know the reason for any **absence** and a decision will be made about whether to authorise this. It is unlikely that absence will be **authorised** for holidays or for any activity which could occur out of the school day. Whilst the Principal will consider all requests on a case-by-case basis, parents must be aware that requests will normally be refused.

#### Regulations related to this policy are:

- 1996 Education Act
- Education (Pupil Registration) Regulations 2006
- Education (Pupil Registration England) Regulations 2013

## **Pupils with Specific Medical or other needs**

Whilst every pupil has the right to a full-time education and high attendance is expected for all pupils, it is recognised that there may be individual circumstances which are a specific barrier to attendance. Where this is the case, the academy, parents / carers and the pupil, along with any other relevant agency will work together to ensure the attendance of the pupil is the best it can be and that any absence is supported by alternative methods (e.g. hospital school, remote access to high quality learning opportunities etc).

# **Important Information**

School day timings: (Greenhill Academy)

#### In the morning

	The school day starts (register is taken at):	A child is late (L code*) from:	A child is late after the register has closed (U code**) from:
Nursery	8.45am	8.55am	9.00am
Reception	9.00am	9.10am	9.30am
Key Stage 1 (Years 1 and 2)	9.00am	9.10am	9.30am
Key Stage 2 (Years 3,4,5 and 6)	9.00am	9.10am	9.30am

<sup>\* &</sup>quot;L code" is used where a child is late. This is still deemed present.

<sup>\*\* &</sup>quot;U code" is late after the register is closed and is deemed an absence.

#### In the afternoon

	The afternoon session starts (register is taken at):	A child is late pm (L code*) from:	A child is late after the register has closed pm (U code**):
Nursery	12.30pm	12.40pm	1.00pm
Reception	12.30pm	12.40pm	1.00pm
Key Stage 1 (Years 1 and 2)	1.00pm	1.10pm	1.30pm
Key Stage 2 (Years 3,4,5 and 6)	1.15pm	1.25pm	1.45pm

#### End of day (pick up time)

	The school day ends at:
Nursery	11.45 (am) and 3.30 (pm)
Reception	3.20pm
Key Stage 1 (Years 1 and 2)	3.20pm
Key Stage 2 (Years 3,4,5 and 6)	3.30pm

#### **Breakfast and After School clubs**

- There is a breakfast club available from 8.30am to 8.45am daily
- There are after school clubs on a Monday to Friday each week.

#### Our daily routines are:

## Gates / doors open

Our gates open for pupils at 8.30 for attending breakfast club. Gates open for children not attending breakfast club and going straight to their classrooms at 8.45am.

Children and families are welcomed by staff at the classroom door for children in the EYFS & Inclusion Hub, and at the gate for children in Years 1 to 6.

An early morning activity-including early morning readers- is available each morning as soon as the children arrive.

The register is taken in class at the start of day.

#### Our first lesson starts at:

	Our first lesson starts at:
Nursery	8.50am / 12.35pm
Reception	9.05
Key Stage 1 (Years 1 and 2)	9.05
Key Stage 2 (Years 3,4,5 and 6)	9.05

#### Our regular attendance routines:

We have Head of Academy Assembly every Friday where good and improved attendance is celebrated through nominated attendance HERO (Here, Everyday, Ready to Learn, On-time) and winning attending class across Key stages. This is a special time for all at our school.

We celebrate 100% attendance or notably improved attendance with a certificate weekly for attendance heroes and termly via attendance tea parties.

Staff encourage good attendance and have a relentless focus on improving attendance throughout the week.

Attendance is shared on our weekly newsletter- this shows our whole school attendance percentage and each class percentage as well as announcing the attendance HEROs of the week.

The class attendance display is updated weekly and classes have an attendance monitor.

Attendance racing cars are given out each week to the class(es) that have the highest-class attendance in each Key Stage, this is also part of the half termly attendance race for each class. There is a prize for each class who wins termly.

For 100% attendance and notable attendance we hold a tea party for children AND their parents at the end of each term. Children who achieve 100% attendance for the whole year receive a special award from the Head of Academy and parents are invited to share in the achievement.

# Who to contact regarding attendance:

Ensuring good attendance is everyone's responsibility. We all have a part to play in making sure all children are in school and thriving. In our academy, all staff are dedicated to supporting good attendance. Some staff have key responsibility for attendance and are contacts if parents / carers / staff have any queries or support needs.

#### **Senior Attendance Champion**

The Senior Attendance Champion in School is Mrs C Glynn.

#### **Attendance Officer**

The Attendance Officer in School is Miss C Wray.

The Board of Trustees and Central Harmony Trust staff also have responsibilities for attendance and support the academy to ensure attendance is a key focus. Specific roles and responsibilities can be found in appendix 3.

#### For unexpected absence:

If a child is not going to be in school, parents/carers must contact the school office on **0161 260 0621** as soon as possible on the first day of absence.

If there is no contact from home, the academy will try to make contact (by phone or home visit). It is important we have contact so we can ensure all children are safe.

#### Requesting time out of school

To request exceptional leave, please speak to Mrs Glynn, Mrs Flynn or Ms Shah.

Please note, holidays in term time will not be authorised. Other absence will be considered on an individual basis and will only be authorised in exceptional circumstances.

#### **Discussing attendance concerns**

To discuss any concerns regarding attendance, please contact Mrs Glynn or Miss Wray.

#### Parent / Carer Contact information

Parents/carers must provide accurate and up to date contact details. This will be requested every year and parents / carers are encouraged to inform school of any changes during the year.

Parents/carers are responsible for updating the academy if their details change.

## How we celebrate good attendance:

We have a number of ways to celebrate good and improving attendance. We realise that it is important to recognise improved attendance from any starting point and that for some pupils there are complex barriers which may make attending school everyday more challenging (e.g. a child with regular hospital appointments). Our celebrations recognise improvements for individuals. We also look at class attendance and improvements in the short-term and over time.

#### Our celebrations include:

- Certificates for good / improving attendance- Attendance HEROs
- Updates and announcements in the weekly newsletter
- Weekly class of the week attendance race
- Phone calls and notes home to celebrate improved attendance
- End of term tea party for 100% attendance and notable attendance
- 100% and notable attendance effort certificates Bronze, Silver and Gold
- Weekly attendance certificates for those with notable attendance the previous week, chosen by Class teachers for the Head of Academy's assembly

#### If a child is absent from school:

We hope our pupils will be in school every day. However, this will not always be possible and we will make a decision regarding authorising absence on an individual basis. Where an absence is not authorised, parents / carer will be informed and there will be an opportunity to discuss.

If a child is absent from school, their parent / carer is expected to contact school (see the unexpected absence section) giving the child's name, class and reason for absence.

If there is no contact, school staff will telephone to find out why the child is absent. We have a duty of care to make sure children are safe so it is important we know why they are not in school and that they are safe. High levels of absence, without good reason, can be a safeguarding concern.

#### **Exceptional Leave**

Term-time leave will not be granted except in exceptional circumstances (e.g. bereavement or serious illness). This will require a discussion with the Head of Academy; Mrs C Glynn.

Any notifications of leave of absence must be made in advance using the 'Leave of Absence Notification Form' which is available from the academy office.

Taking a pupil out of school, except in agreed authorised circumstances will be recorded as an **unauthorised absence** and may attract a **Penalty Notice.** 

#### Exceptional leave is NOT:

- Availability of cheap flights and / or holidays
- Availability of desired accommodation
- Parent / carer work commitments
- Poor weather experienced during school holidays
- Dates overlapping with the beginning or end of half terms or terms
- Circumstances where children can be looked after by close family members i.e. the other parent
- A sibling with a special educational need or a sibling attending a medical appointment

Where exceptional leave is granted, a return date must be specified. Parents/carers may lose their child's place on the school roll if the child does not return within five days of the agreed date of return.

#### **Religious Observance**

The academy will try to ensure that families are able to celebrate key religious festivals without it affecting their child's education.

When large numbers of our pupils are affected, the Academy will try to accommodate Trust closure days as close to anticipated religious observance days, to allow for pupils to take religious observance without affecting their attendance. Wherever this is facilitated it will be for one academy day. All pupils must return to the Academy as usual the following day. Where this is not possible, specific decisions regarding time off for religious observance will be made and shared with parents well in advance. Only one day of absence will be authorised.

#### **Appointments**

- As far as possible, parents/carers should attempt to book routine medical and dental appointments outside of school hours.
- Where this is not possible, an appointment card/ evidence of an appointment (e.g. text) must be shown to school.
- Pupils must attend school before and after the appointment wherever possible.
- If the appointment requires the pupil to leave during the school day, they must be signed out by a parent/carer and signed back in on their return.

#### **Approved Educational Activity**

Children who are educated off-site or who are engaged in supervised educational activities away from school premises, such as school residential trips, day visits to secondary schools or curriculum enrichment activities at local secondary schools are marked as present. Details of the codes used can be found in appendix 2.

#### Holidays in term time

Where a family takes a holiday during term time, the absence will be coded as unauthorised (G code) and it will be referred to the Local Authority. A **Penalty Notice** may be issued to each parent for each child. This is in line with the Local Authority policy.

All leave of absence taken without the agreement of the Academy will be recorded as unauthorised.

#### **Children Missing in Education**

If we cannot contact a family and do not know where a child is, we will report them as missing in education. This report is made to the Local Authority. The LA has a duty to investigate the whereabouts of such children and negotiate their prompt return to suitable education.

# **Re-integration Meetings**

For children who have long periods of absence (e.g. hospitalisation), there will be a re-integration meeting with parents to ensure the return to school is successful. At the meeting expectations for attendance will be discussed.

#### Monitoring attendance and using data:

Attendance data is a useful tool to provide detail about where our attendance is good and areas which need support and additional focus.

#### How we gather attendance data

Registers are taken twice a day and this is kept on our school Management Information system. Pupils are awarded an attendance mark for being present in the morning, and a second mark for afternoon attendance.

Daily attendance registers are completed within the class and children are marked present or absent.

The registers are reviewed by the Attendance Lead and Head of Academy. All absences and persistent lateness are investigated. If a pupil is absent and the school has not been contacted, then there will be a phone call home to check on why a child is not in school. Where necessary a home visit will be undertaken.

Where there is a reason given for absence, a decision will be made whether to authorise this and an **absence code** will be added to the register (see appendix 2).

#### How we Monitor attendance data?

Daily attendance is monitored by Ms Shah and Miss Wray. Absence phone calls and home visits are made as required after this analysis.

Weekly attendance is monitored. Parents will be made aware if their child's attendance is 'at risk' of falling below national averages and lower. If the attendance drops below 90% the pupil is deemed a "persistent absentee" and closer monitoring and support will be undertaken.

Half termly and termly attendance is monitored by the academy and the Trust central team. Patterns are identified for individuals, groups, year groups and the school as a whole. We look at where our focus should be and the impact of interventions that we have completed in the previous term.

Parents / carers will be made aware of their child's attendance termly as routine (e.g. at start of year, parent consultations). If there are any concerns raised about a child's attendance during weekly monitoring, we will contact parents / carers to identify our concerns and to offer an opportunity to discuss how we may be able to support the family to improve their child's attendance.

Returns of academy data are made termly to the Department for Education and benchmark data exists to compare our academies locally and nationally.

We set attendance targets each year. These are agreed by the Academy Senior Leadership Team and the Trust Leadership Team. Attendance data is sent to the Board of Trustees.

Attendance procedures are regularly analysed for impact so we can ensure they are supporting improvements in attendance across the academy.

# Tailored support to help reduce absence:

# Levels of attendance support and intervention

	Attendance	Lead by	Attendance Strategies in place
	%		
	190 DAYS 100% Very best chance of success  183 DAYS 96% Off to a flying start	Class teachers (with light- touch monitoring by attendance officer)	Warm welcome In-class attendance celebration and praise Weekly attendance assembly Attendance rewards (see celebration section for details) Parents / Carers recognised for their role in 100% attendance  Weekly attendance check Half termly monitoring of attendance to ensure high attendance being maintained Termly report to parents / carers and celebration
	179	Attendance Officer	As above + (after October half term or earlier if significant concerns developing)  Letter 1a may be sent once a child drops between 93 and 95.9% (to alert parents /
	DAYS 94% Less chance of success		carers and to offer support)  Discussion with parent / carer encouraged. This is to offer support.
			If no improvement, letter 1b. Meeting requested by attendance lead. Informal discussion and offer of support
	00	Attendance Officer	Letter 2a may be sent once a child drops between 90.1 and 92.9% (to alert parents / carers and to offer support)
	175 DAYS 92% Harder to		Attendance lead and senior leader to meet with parent / carer and support offered.  Attendance plan / contract put in place for time-limited period.
•	make progress		Consider referral to outside agencies (e.g. Early help, local charity organisations with agreement from parent / carers)
			If no improvement, letter 2b. Continuing concerns regarding potential persistent absence. Potential for referral to education welfare (dependent on reasons for absence), continued support offered. Absence will not be authorised without professional evidence (e.g. medical note)
	More than	Senior leader	Letter 3a and discussion with Education Welfare Officer  Senior leader has meeting with parent / serer Individual attendance plan / sentract
	18 days absence is less than	EWO	Senior leader has meeting with parent / carer. Individual attendance plan / contract. Move to formal support process.
	Persistent Absentee		Consider referral to other services (e.g. Child Social care, early help etc).
			If no improvement, Education welfare will support next steps (see formalising support for more information). Support offered throughout.

#### Parental engagement

Our academy wants to work closely with parents and carers to ensure all children attend school every day. We will provide information to parents to help them understand their role in attendance and to make sure our expectations are clear. This will be through communications such as letters, leaflets and an attendance workshop for parents / carers.

#### Where attendance is lower than 96%

Parents and carers have a responsibility to ensure their child attends school every day unless there is an exceptional circumstance. However, we recognise that every circumstance is different and there are sometimes barriers and challenges which make attendance more difficult. These may be short-term or longer term in nature. We aim to support parents and carers where there are challenges as much as possible. The needs of families differ so it is important that there is an ongoing dialogue between the child, home and school to identify the barriers and seek ways to remove them.

Parents / carers are encouraged to speak to the Head of Academy; Mrs Glynn if they are facing any challenges which is making their child's attendance more difficult. If school identify a child's level of attendance is decreasing, they will arrange to speak to parents and carers at an early stage to prevent more serious attendance issues.

#### Persistent Absence – below 90%

A child is deemed **Persistently absent** if they have an attendance of lower than 90%.

For children at risk of becoming persistently absent, school will speak to parents / carers so they are aware of the concerns and to support improvement in attendance.

Where there is persistent absence and ongoing attendance concerns, arrangements will be made for parents to speak to the Head of Academy; Mrs Glynn. The Local Authority attendance officer will be alerted and a plan will be drawn up improve attendance. This will be monitored and improvements noted and celebrated.

Absences will not be authorised without evidence from a professional (e.g. medical note). A multiagency approach will be considered and referral made to relevant support services if it would be of benefit

#### Severe Absence – below 50%

A child is deemed **Severely absent** if they have an attendance of lower than 50%.

If pupil absence drops below 50%, a multi-agency approach will take place in partnership with the local authority Attendance Officer. The agencies involved will depend on the individual circumstance but may include:

- Social Care
- Support teams through Early Help
- Medical teams
- Youth teams

- Local charities
- EWO

# Formalising support:

Where a child is deemed persistently or severely absent, support will be formalised. There will be a **multi-agency approach** considered in partnership with the **Local Authority attendance officers**. The aim is to support families to improve their children's attendance and to provide support with this.

There will be a formal attendance improvement plan which will be regularly monitored.

If, after this formal process, there is little or no improvement, formal sanctions will be considered.

#### **Formal sanctions**

Where support has not helped and a pupil's attendance remains of serious concern, the Local authority will consider moving to more formal sanctions. These are dependent on the individual circumstance but may include:

- Parenting contracts
- Education supervision orders
- Attendance Prosecution
- Parenting orders
- Fixed penalty notices

In the unlikely event these sanctions become relevant, information will be given to the parents / carers well in advance as part of earlier discussions.

#### Improvement and ending formal support

Where improvements have been made, these will be celebrated. There will be a period of time to monitor sustained improvements. Once there is agreement in the multi-agency team that improvements have been sustained, formal support will end. Ongoing school monitoring will continue as detailed in the tailored support section above.

# **Equality Impact Assessment**

Under the Equality Act 2010 we have a duty not to discriminate against people based on their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation. This policy has been equality impact assessed and we believe it is in line with the Equality Act 2010 and it is fair, it does not prioritise or disadvantage any pupil and it helps to promote and encourage equality in our academies.

# **Data Protection Statement**

The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.

All data will be handled in accordance with the school's Data Protection Policy.

		Data Audit F	or This Polic	У	
What?	Probable Content	Why?	Who?	Where?	When?
Attendance policy	Any personal information including personal sensitive information	Required to be retained as part of school data management	Academy Mgt Information system, school staff as needed, attendance officer, SLT, Trust central staff as required	Kept on file at academy (and Trust central where appropriate).	Held on file following relevant retention periods (dependent on nature of personal information)

As such, our assessment is that this policy:

Has Few / No	Has A Moderate	Has a High Level
Data	Level of Data	Of Data
Compliance	Compliance	Compliance
Requirements	Requirements	Requirements
		✓

# Appendix 1 – Definitions

Word	Definition
Attendance	Coming into school
Absence	Arrival at school after the register has closed.
	Not attending school for any reason.
Authorised Absence	<ul> <li>An absence for sickness for which the academy has granted leave.</li> <li>Medical or dental appointments which unavoidably fall during school time for which the academy has granted leave.</li> <li>Religious or cultural observances for which the academy have granted leave.</li> <li>An absence due to unplanned and significant family emergency, meaning you must leave in an emergency.</li> </ul>
Unauthorised Absence	<ul> <li>Parents/carers keeping children off school unnecessarily or without an accepted reason.</li> <li>Truancy before or during the school day.</li> <li>Recurring medical appointments of a non-urgent nature.</li> <li>Absences which have never been properly explained.</li> <li>Arrival at school after the register has closed.</li> <li>Shopping, looking after other children or birthdays.</li> <li>Day trips and holidays in term time which have not been agreed and have been booked or planned in advance.</li> <li>Leaving school for no reason during the day.</li> </ul>
Persistent Absence	Attendance below 90% (Missing 10% or more of schooling across the year for any reason)
Punctuality	Being on-time
Severe Absence	Attendance below 50%
Register	<ul> <li>Legal document which details whether a child is in school for that session</li> </ul>
Exceptional leave	Unavoidable leave which is not part of the norm and would be extremely unusual. This would be discussed on an individual basis
Penalty Notice	A fine issued by the Local authority for unauthorised attendance
Absence code	<ul> <li>A code used to describe the type of absence. These can be authorised or unauthorised (see appendix 2)</li> </ul>
Local Authority	The local council
Multi-agency approach	<ul> <li>Joint working between those who work with the family. This may include health, social care, the police, voluntary agencies, Attendance officers, Family support workers etc.</li> </ul>
Local Authority attendance officer	The attendance officer allocated to the school. They support school to ensure all children come to school every day. This role is also known as Education Welfare officer (EWO)

# **Appendix 2 – Attendance and Absence Codes**

Attendance and absence must be given a code on the register. For more information, go to:

 $https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1073616/Working\_together\_to_improve\_school\_attendance.pdf$ 

/\	Present	I	Illness (not medical)	Р	Approved sporting activity	W	Work experience
В	Educated off site	J	Interview	R	Religious observance	#	Planned whole or partial school closure
С	Leave of absence granted by the school – exceptional	L	Late (before reg closed)	S	Study leave	Υ	Unable to attend due to exceptional circumstances (e.g. site closure)
D	Dual registration at another school	М	Medical / Dental	Т	Traveller absence	Z	Prospective pupil not on admission register
E	Excluded (no alternative provision)	N	No reason yet provided	U	Late (after register closed)	-	All should attend/ No mark recorded
G	Family holiday (not agreed or days in excess)	0	Unauthorised (not covered by other code)	V	Educational visit or trip	Х	Non-compulsory school age not required to be in school
Н	Holiday (agreed) – this will not usually be granted						

## Appendix 3 - Key roles and responsibilities

#### **Pupils**

 All pupils are responsible to making sure they come to school every day they can and are ready to learn.

#### Parents / Carers

- Parents and carers will be expected to take responsibility for the attendance of their child/children ensuring that they attend school every day during term-time, on-time and ready to learn.
- Parents / Carers are responsible for ensuring that their children attend school every day and any agreed clubs and activities throughout the school year.

#### **Class Teachers**

- Class teachers will be responsible for checking-in with pupils on their return.
- Class teachers will ensure a high quality provision and engaging curriculum
- Class teachers will review their class attendance, discuss attendance concerns with parents / carers and work with others to offer wider support as necessary.

#### All Staff and volunteers

- All staff and volunteers will be responsible for raising the profile of good attendance in line
  with school policy, celebrating success and communicating the importance with pupils and
  parents. They will also be responsible for ensuring the policy is implemented fairly and
  consistently.
- All staff and volunteers will be responsible for following the attendance policy and for ensuring pupils do so too. They will also be responsible for ensuring the policy is implemented fairly and consistently.
- All staff and volunteers will be responsible for modelling good attendance behaviour and implementing the agreed policy.

#### **Administration Officer**

- Administration staff welcome pupils into school and provide a welcoming entrance to the school
- Administration staff note absences and ensure the Management Information System is updated accurately
- Administration staff make first day contact phone calls and liaise with classroom staff and the attendance officer

#### **Attendance Officer**

- Attendance Officers will be responsible for the day to day implementation of procedures, monitoring of attendance and communication with parents.
- Attendance Officers celebrate good and improved attendance and encourage a positive attendance culture

- Attendance Officers ensure decisions regarding absence are appropriate and correctly recorded
- Attendance Officers analyse attendance data and communicate with parents / carers through meetings, letters, and attendance at multi-agency meetings
- Attendance Officers undertake home visits as appropriate
- Attendance Officers flag concerns with DSLs and the Senior Attendance Champion

#### **Senior Attendance Champion**

- The Senior Attendance Champion will lead on improvements in attendance
- The Senior Attendance Champion will be accountable for the day-to-day implementation and management of the attendance policy and procedures.
- The Senior Attendance Champion celebrates good and improved attendance and encourage a positive attendance culture
- The Senior Attendance Champion, in conjunction with the Principal (where different) ensures there are sufficient resources allocated to attendance
- The Senior Attendance Champion ensures absence is authorised appropriately
- The Senior Attendance Champion analyses data to ensure individuals, cohorts and groups are identified and attendance needs met.
- The Senior Attendance Champion analyses the impact of interventions
- The Senior Attendance Champion leads on discussions regarding extended leave with families and ensures procedures are followed for families where attendance is of concern
- The Senior Attendance Champion will be able to explain the current attendance trends and processes to internal and external partners

#### **Trust Safeguarding Team**

- The Trust Safeguarding Team will provide half termly data to academies to support their analysis of attendance
- The Trust Safeguarding Team will support academies to implement the attendance policy and guidance on a priority basis
- The Trust Safeguarding Team will provide CPD and updates for all attendance staff

#### **Executive Leadership Team**

- Has responsibility for handling complaints regarding this policy as outlined in the Trust's complaints policy.
- Monitors attendance across the Trust and ensures Senior Attendance Champions are prioritising attendance according to policy
- Report attendance outcomes and procedures to Trustees

#### **Board of Trustees**

The Board of Trustees:

• Has overall responsibility for the implementation of the attendance policy and procedures.

• Has overall responsibility for ensuring that the attendance policy, as written, does not

discriminate on any grounds, including but not limited to ethnicity/national origin, culture,