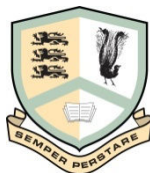


Bales College

Attendance Policy

2026-27



1. Rationale and aims

Bales College (“the School”) believes that full and punctual attendance is fundamental to every student’s achievement and wellbeing. There is a strong link between attendance and attainment, and poor attendance can be a vital warning sign of a range of safeguarding issues, including neglect and child sexual and criminal exploitation. The School sets a minimum attendance target of 95% and works in partnership with students and families to achieve it; attendance below this level is treated as a cause for concern that prompts support.

This policy provides a consistent framework for promoting attendance and punctuality across all year groups; for recording attendance accurately using the national codes; for identifying and supporting students whose attendance gives cause for concern; and for meeting the School’s statutory duties — including, for sponsored students, its duties as a licensed Student Sponsor. It applies to all students. Because the statutory framework differs for students of compulsory school age and those above it, the policy distinguishes the two regimes where relevant.

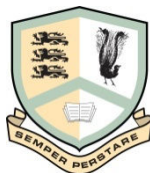
2. Statutory framework

This policy has regard to, and is consistent with, the following:

- The School Attendance (Pupil Registration) (England) Regulations 2024 (in force 19 August 2024), which set out the contents of the admission and attendance registers and the national attendance codes.
- Working Together to Improve School Attendance (Department for Education) — statutory guidance since 19 August 2024, updated July 2026 — given force through Keeping Children Safe in Education.
- Keeping Children Safe in Education 2026 (in force 1 September 2026) and the Children Missing Education guidance, under which unexplained or extended absence is treated as a safeguarding matter.
- The Independent School Standards — in particular Part 3 (welfare, health and safety) and Regulation 15 (maintenance of the admission and attendance register).
- The UKVI Student Sponsor Guidance, Document 2, in respect of sponsored students.
- The Data Protection Act 2018 and UK GDPR, which govern the processing of attendance and immigration data.

The School’s statutory attendance and admission-register returns are made to **Westminster City Council** as the relevant local authority.

3. Roles and responsibilities



3.1 Parents and guardians

Parents and guardians (or, for an international/sponsored student in the UK who has no parent or appointed guardian in this country, the student together with their parent or guardian overseas) are asked to:

- Ensure the student attends every day and is punctual.
- Telephone or email the School office before 9.30am on each day of absence, giving the reason and the likely return date.
- Arrange non-emergency medical and dental appointments outside school hours where possible.
- Provide medical verification where illness-absence is frequent or prolonged, or where the School has reasonable doubt about the reason given.
- Apply in advance, in writing, for any leave of absence; please note that DfE guidance is clear that there is no entitlement to leave for holidays in term time and that such leave will not be granted other than in exceptional circumstances.

3.2 Students

Students are required to attend every day, to arrive in time for morning registration, to be punctual to lessons, and — where applicable — to sign in and out at reception. Sixth-form students with private study periods must sign in as directed so their presence is recorded. Failure to attend or to sign in may be addressed under the Behaviour Policy.

3.3 Teaching staff and form tutors

Form tutors take the register at each session, follow up absence and lateness, and keep entries in Engage accurate and up to date. The Absences team is responsible for clearing every N-code (reason not yet established) within the statutory five-school-day window. Our aim, however, is to establish the reason for any unexplained absence within the day, given its importance for safeguarding the welfare of our students. All staff understand that poor attendance can indicate a safeguarding concern and report concerns to the DSL.

3.4 School leadership and the Senior Attendance Champion

The Senior Attendance Champion, Mrs Poonam Sachdeva (DSL), a member of the Senior Leadership Team, has overall responsibility for championing and improving attendance. The Senior Attendance Champion leads the analysis of attendance data, oversees accurate recording, ensures the statutory returns are made, and identifies the students and cohorts who most need targeted support. The Head of School sets annual attendance expectations, ensures staff and students are inducted into this policy, and reports attendance to the Proprietor each half-term (and sooner where a concern requires it).



The Senior Attendance Champion authorises the reason codes recorded against a student's absence and decides whether a reason given is accepted. Form tutors record attendance, lateness and unexplained absence at the register (codes / \, L and N); all other codes are applied by the School office under the Senior Attendance Champion's authority. The Absences team clears N-codes within the statutory five-school-day window.

3.5 Who to contact about attendance

Day to day — to report an absence or ask about attendance, parents and students should contact the School office (office@balescollege.co.uk, 020 8960 5899) and, where relevant, the student's form tutor. For more detailed support with attendance, the point of contact is the Senior Attendance Champion, Mrs Poonam Sachdeva (DSL), through the School office.

4. Registration procedure

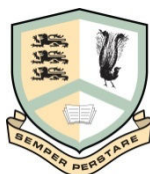
Form tutors take the attendance register at the beginning of the morning session and once during the afternoon session, each school day, in Engage. The morning register opens at 8.45am and closes at 9.00am. The afternoon register opens at 1.40pm and closes at 1.45pm. A student is recorded present only if physically present (or sighted) at registration.

4.1 Register close time and lateness

Each register is open from the start of the relevant form-time period until it ends: the morning register from 8.45am to 9.00am, and the afternoon register from 1.40pm to 1.45pm. Both periods are within the statutory maximum of 30 minutes. The registers close at the end of form time so that every student is registered by the member of staff who is with them; the two periods differ in length because the morning and afternoon form-time periods differ in length. A student arriving before the register closes is recorded as Late (code L), which counts as present. A student arriving after the register has closed, but before the end of the session, is recorded as unauthorised late (code U). Students arriving after registration must sign in at reception. Persistent lateness is addressed under the Behaviour Policy.

4.2 Following up absence on the day

Where a student is absent and no reason has been received, the absence is recorded as N (reason not yet established). A member of the office contacts the family from 9.30am to establish the reason and the expected return. For a student in the UK without a parent or guardian, the student is contacted directly and the parent or guardian overseas is informed. First-day contact is both an attendance step and a safeguarding step.



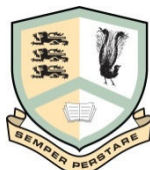
4.3 The N → O rule

Code N is a holding code only. The correct reason code must replace it as soon as the reason is known, and no later than five school days after the session. If no satisfactory reason is established within five school days, the record must be amended to O (unauthorised). N must never be left unresolved on the register.

5. Registration codes

The School uses the national attendance and absence codes in full, as set out in the 2024 Regulations and Working Together to Improve School Attendance. The summary below shows each code and its statistical treatment. Codes shaded below are unauthorised and drive the statutory returns in section 7.

Code	Meaning	Statistical treatment
/\	Present (AM / PM)	Present
L	Late – arrived before the register closed	Present
B / P / V / W / K	Approved educational activity off-site / sport / trip / work experience / LA provision	Attendance
D	Dual registered at another school	Not a possible attendance
C	Leave of absence – exceptional circumstances	Authorised
C1 / C2	Performance licence / part-time timetable (CSA)	Authorised
J1	Interview for employment or admission (e.g. university open day)	Authorised
M	Medical or dental appointment	Authorised
R	Religious observance	Authorised
S	Study leave for a public examination	Authorised
I	Illness (physical or mental health); not a medical or dental appointment, which is code M	Authorised
E	Suspended or excluded, no alternative provision yet	Authorised
T	Parent travelling for occupational purposes	Authorised
Q	Unable to attend because of a lack of access arrangements	Not a possible attendance
Y1–Y7	Unable to attend – unavoidable cause (transport normally provided unavailable, widespread travel disruption, part or all of the site closed, public health, other unavoidable cause)	Not a possible attendance
G	Holiday not granted by the school	Unauthorised
N	Reason not yet established (→ correct code or O within 5 school days)	Unauthorised
O	Absent in other or unknown circumstances	Unauthorised
U	Arrived after the register closed	Unauthorised
X	Non-compulsory-school-age pupil not timetabled	Not a possible attendance
Z / #	Prospective pupil not yet on roll / planned whole-school closure	Administrative



Code C (leave of absence for exceptional circumstances) is the only code for agreed leave, and each use must carry a recorded rationale. There is no authorised-holiday code: a holiday not granted is coded G (unauthorised).

6. Attendance monitoring to identify and support students with attendance concerns

6.1 Promoting and incentivising good attendance

The School promotes good attendance as part of its culture: through daily registration and strong form-tutor relationships, through assemblies and messaging on the link between attendance, achievement and wellbeing, and through clear communication with parents about their child's attendance and the expectations set out at the start of each year. Good and improved attendance is recognised and rewarded through the School's rewards system (see the Behaviour Policy) — for example, recognition for full or much-improved attendance.

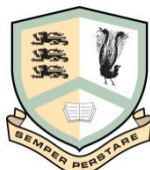
6.2 Using data to target support

The Senior Attendance Champion analyses attendance data at least fortnightly and reviews whole-school, year-group and cohort patterns at least half-termly, to identify the students and groups who most need support — including any group whose attendance is lower than that of their peers. Support and resources are targeted first at those students and cohorts.

6.3 Supporting students and reducing persistent and severe absence

Where a pattern of absence is developing, the School acts early — it does not wait for attendance to fall to a fixed threshold — working with the student and family to understand and remove the barriers to attendance, and treating school as a place of safety and support rather than reaching first for sanctions. Persistent absence is defined in Working Together to Improve School Attendance as missing 10% or more of sessions, and severe absence as missing 50% or more; the School treats all absence seriously. As absence intensifies, so does the support: this may include mentoring, a voluntary early help assessment or whole-family plan, and referrals to wider support services, working in tandem with Westminster and other partners to remove the barriers to attendance. Where there are safeguarding concerns — especially where absence becomes severe — the DSL will consider a referral to children's social care. For students of compulsory school age, where voluntary support is not engaged with or is not effective, the School will work with the local authority to formalise support and, where appropriate, pursue other statutory routes.

7. Statutory returns to the local authority



For students of compulsory school age, the School notifies Westminster City Council in the following circumstances (under Working Together to Improve School Attendance). These are reports; they do not of themselves remove a student from roll.

- Continuous unauthorised absence: any student absent for a continuous period of 10 school days recorded with one or more unauthorised codes (G, N, O, U).
- Sickness: any student recorded on code I where the School has reasonable grounds to believe they will miss 15 days, consecutively or cumulatively across the school year (one return per continuous period).
- Admission-register changes: every addition or deletion outside standard transition times — deletions before they are made and additions within five working days — including the statutory reason for any deletion.

The frequency of attendance returns is as agreed with the local authority, and no less than once per calendar month.

8. Students missing education and removal from roll

Unexplained extended absence is treated as a potential safeguarding matter and may engage the Children Missing Education process. Reaching the 10-day unauthorised-absence threshold (or, for a sponsored student, 10 missed expected contacts) generates a report — it does not authorise removal from the admission register.

A student of compulsory school age may only be removed from the admission register on a ground set out in regulation 9 of the 2024 Regulations. The continuous-absence ground requires 20 school days of continuous absence (coded G, N or O), no reasonable grounds to believe the student is unable to attend through sickness or unavoidable cause, and that the School and local authority have jointly made reasonable efforts to establish the student's whereabouts. Until those conditions are met, the student remains on roll and the School continues to follow up and, where appropriate, to involve the local authority.

For a student above compulsory school age, the School may remove the student from roll where it has no reasonable grounds to believe the student will attend again, in line with regulation 9. For sponsored students this runs alongside, and does not replace, the UKVI duties in section 9.

9. Sponsored (Student-visa) students – UKVI duties

As a licensed Student Sponsor, the School owes duties to UK Visas and Immigration that are additive to, and independent of, the local-authority thresholds above. These duties apply regardless of a student's age.



9.1 Expected contacts and reporting

An “expected contact” is defined, for UKVI purposes, as a day present at the School. Where a sponsored student misses 10 consecutive expected contacts without acceptable, evidence-based explanation, the School will report the student to UKVI (absent exceptional circumstances). This 10-expected-contact trigger is separate from, and operates independently of, the local-authority 10-school-day unauthorised-absence threshold; both may be live at once.

The School will also report to UKVI, using the prescribed systems, where a sponsored student discontinues their course, defers, is absent for more than 60 days, changes course, or where there is any other significant change in circumstances — whichever occurs first.

9.2 Records, monitoring and engagement

- Right-to-study checks are completed before enrolment and evidence retained; copies of passports and immigration documents are kept, but original passports are never retained.
- Where a sponsored student shows a pattern of absence or repeated small absences, the student and their parent or guardian are warned in writing; persistent absence without valid reason following a warning is reported to UKVI.
- The School Leadership Team reviews attendance weekly and discusses any student who has received a warning or been reported to UKVI.
- A register of students reported to UKVI is maintained by the School office and reviewed by the Head of School; interviews and warnings, and the reasons and evidence for any authorised absence, are recorded on the student file.
- The School will take all reasonable steps to establish the whereabouts of any student who has ceased attending or whose place has been withdrawn, and will provide relevant information to UKVI.

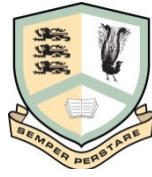
Operational responsibility for SMS/UKVI reporting sits with the Business Manager.

10. Data protection

All attendance and immigration data is processed in accordance with the Data Protection Act 2018 and UK GDPR, held securely in Engage and the School’s systems, and shared with the local authority, UKVI or safeguarding partners only as required by the duties set out in this policy or where it is necessary to protect a student’s welfare.

11. Policy monitoring and review

The Head of School is responsible for the effective implementation of this policy. The policy is reviewed annually, and sooner following any relevant change to statutory guidance, to ensure continued compliance with the Independent School Standards, DfE attendance guidance and UKVI sponsor duties. The next scheduled review is August 2027.



Signed:

Ben Moore — Head of School

Date: _____

William Moore — Proprietor

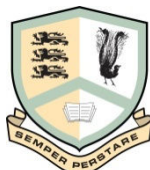
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Appendix A – Regulatory cross-reference

This appendix maps the policy to the frameworks against which it will be inspected, supporting its use as self-evaluation evidence.

Policy area	Framework / cross-reference
Statutory framework, roles, register	ISS Part 3 (welfare) & Regulation 15 (admission/attendance register); ISI Inspection Framework (Sept 2025)
Following up absence; missing pupils	KCSIE 2026 (children missing education as a safeguarding indicator); Children Missing Education (DfE)
Registration codes; data returns	School Attendance (Pupil Registration) (England) Regulations 2024; Working Together to Improve School Attendance (DfE, Aug 2024; updated July 2026)
Leave of absence (independent school)	Regulation 11 (2024 Regs) – not binding on independent schools; Leave of absence in independent schools (DfE, April 2025)
Sponsored (visa) students	Student Sponsor Guidance, Document 2 (UKVI)
Leadership oversight; data protection	ISS Part 8 (leadership & management); Data Protection Act 2018 / UK GDPR



Appendix B – Daily attendance procedure (summary)

- Form tutors take the register in Engage: the morning register is open from 8.45am to 9.00am and the afternoon register from 1.40pm to 1.45pm.
- Unexplained absence is recorded as N; the office begins contacting families from 9.30am to establish the reason.
- N-codes are cleared to the correct reason code, or to O, within five school days.
- Late before the register closes = L (present); late after the register closes = U (unauthorised).
- Daily attendance is reviewed by the office; concerns are escalated to the Senior Attendance Champion / DSL.
- For sponsored students, missed expected contacts are tracked separately and reported to UKVI per section 9; a UKVI-report register is maintained.
- Statutory returns to Westminster City Council are made for 10-day continuous unauthorised absence, 15-day sickness, and admission-register changes.