

School Attendance – Accurate Registration Coding/Deletion From Roll

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Introduction

- Covid – multiple regulation and code changes
- Changes of school staff
- Workload and stress
- Better data/new referrals
- Missing marks
- Inaccurate coding
- Situations where schools may be vulnerable
- Re-emergence of deletion from roll myths

The law

- 1996 Education Act
- Education (Pupil Registration) (England) Regulations (Amendment 2016)
- Admissions – ‘expected first day of attendance’
- Absence – statutory defences
- Department for Education School Attendance Guidance
- National codes
- 15 prescribed circumstances - deletion from roll (Regulation 8)
- Regulation 8 (4) – ‘habitually and ordinarily resident’
- Regulation 12
- Requirements for schools and LAs re; notification of absence
- National codes

Accurate registers

What schools are required to do

- Register pupils twice a day (including special schools)
 - Once in the morning and once in the afternoon (second session)
 - Ensure there are no missing marks
 - Open and close of register time
 - Half an hour
- Codes L and U
 - Ensure national codes are used
 - X code now only for untimetabled sessions for children of non compulsory school age only
 - Part-time timetable – C codes for the sessions the child isn't due to attend regardless of whether they attend the other session

Codes - examples

Authorised Absence

C - Other authorised circumstances

E - Excluded

I - Illness

M - Medical Appointment

R - Religious Observance

Unauthorised Absence

G - Unauthorised leave in term time

N - No reason yet provided

U - late after the close of registration

Present

\ / - Present

L - Late

B - Approved Educational Activity

V - Educational visit

W - Work experience

Not counted in possible attendances

D – Dual registration

X – Un-timetabled sessions for non compulsory school age pupils

Y – enforced closure

Accurate registers – leadership considerations

What leaders need to do

- Provide training and written guidance for staff on how to complete the registers
- Include written guidance for supply staff
- Ensure registers are completed twice a day without fail
- Ensure morning registers are closed within half an hour of opening
- Ensure the national codes are used according to the DfE guidance
- Decide N codes within two weeks
- Decide whether specific absence is authorised or not (could be delegated to attendance staff)
- Ensure admin staff are aware if medical evidence has been requested for a particular child
- Do regular checks to ensure there are no missing marks or inappropriate codes use
- Take action where individual staff members repeatedly fail to complete the registers accurately

Common myths – accurate registration

All of these myths are... myths!

- *'If you know a child is going to be on leave for two weeks you can populate the registers with G codes in advance'*
- *'You can use the morning register to populate the afternoon register'*
- *'Pupils can take the registers to give them a sense of responsibility'*
- *'You can use code O for all pupils as the default code for absence until medical evidence is submitted'*
- *'Parents with children who have absence below 90% must provide medical evidence in order for absence to be authorised'*
- *'You can use Code B for part-time timetables where children are provided with online learning to do at home'*
- *'You can close the school at lunchtime every Friday but register the children for the afternoon session before closure so that attendance isn't impacted'*

Inaccurate registers – legal and safeguarding implications

- Missing marks – unlawful and unsafe
- Ofsted – ‘gaming’
- Avoiding U codes or misuse of codes such as code X, Y, B or D
- Inadequate judgement
- Leadership
- Fire safety – child marked as absent might be present and at risk in a fire
- Information for other agencies such as police and BCT might be inaccurate
- Registers as evidence for prosecution unreliable so ELIT unable to take attendance cases forward

Deletion from roll

What schools are required to do...

- Only delete a child's name from the register under the prescribed Regulations
- Notify the local authority of all deletions before or as they are made (except normal transition deletions for year 6 and year 11)
- Complete a pupil movement form – school portal
- Include the specific regulation under which the deletion is made
- Include parent's name, contact details and **forwarding address**
- Notify SENAR of children with EHCP whose name you wish to delete and why
- Special schools – await authorisation for deletion from SENAR
- Be aware of different regulations for children of non compulsory school age

Deletion Regulations - examples

- Reg 8(1)(b) - Transfer between schools
- Reg 8(1)(c) - Where pupil on roll at two schools and both agree (dual registration)
- Reg 8(1)(d) - Pupil withdrawn re; education otherwise
- Reg 8(1)(e) - Ceased to attend & no longer residing in a place which is a reasonable distance from the school
- Reg 8(1)(h) - 20 days continuous unauthorised absence and school and LA jointly make enquiries failing to locate pupil
- Reg 8(1)(i) - In custody (not remand) for four months or more (Y and B codes)
- Reg (8)(1)(m) - Permanent exclusion

Deletion from roll – leadership considerations

What leaders need to do...

- Ensure the staff are familiar with the regulations to avoid accidental 'off-rolling'
- Ensure the staff are familiar with associated attendance and CME procedures
- Check that the LA is being notified of all deletions at the time they occur
- Ensure senior leadership sign off except where deletion due to normal end of key stage (years 6 and 11)
- Ensure the correct information required for the deletion has been collected from parents, **with forwarding addresses for ALL deletions including transfers**
- Discuss deletions relating to any child with an EHCP with SENAR
- Await authorisation from SENAR if a special school
- If a CME referral has been made, await a deletion notification from the CME team

Common myths – deletion from roll

All of these myths are...myths!

- *'Children can be taken off roll after 20 days unauthorised absence'*
- *'If a child transfers to a new school you don't need to complete a pupil movement form'*
- *'You can take a child off roll if they have gone abroad without the new address being known'*
- *'If a parent requests a child be taken off roll you have to agree it'*
- *'We don't agree that the parents can electively home education so we kept the child on roll'*
- *'The parents are going abroad, say they are going to return but don't have a return date so we can take the children off roll'*
- *'You can backdate deletions for CME to when the children were last in school'*

Unlawful deletion from roll – legal and safeguarding implications

- Deletion outside of the regulations is unlawful
- Offence – Section 434(6) of the Education Act 1996
- Same level as offence under Section 444 (parents/attendance)
- Children missing
- Trafficking/Criminality/CSE/child deaths
- Ofsted – ‘ off rolling’
- Inadequate judgement
- Leadership

Summary

- Accurate registration and deletion from roll within the regulations is a legal requirement
- Ofsted – ‘gaming’ and ‘off rolling’ – category risk
- Schools must notify the LA of all deletions (except those at the end of normal transition – years 6 and 11)
- Safeguarding implications
- Legal implications
- Online guidance provided by BCC and the DfE

Further information

- [Education Legal Intervention Team
attendance@birmingham.gov.uk](mailto:attendance@birmingham.gov.uk)

- General information on attendance, legal processes, deletion from roll, part-time timetables etc.

[Birmingham school attendance guidance](#)

- Guidance for schools on emotionally based school avoidance
[#you've been missed guidance](#)



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