Response to the Estyn thematic report on pupil registration practices
Estyn Remit Reports
Welsh Government Response

Report title:
Pupil registration practices

Report details
The report was commissioned by the Welsh Government Education Directorate to investigate the prevalence and impact of schools ‘off-rolling’ pupils. The report focuses on establishing how common it is for schools to ‘off-rolling’ pupils and what local authorities are doing to tackle the practice. In addition, it sets out the destination of pupils who are taken off roll.

Summary of main findings

Estyn found a number of ways in which the registration of pupils is not being used as intended. This includes: removing pupils from the school roll without formal exclusion (off-rolling); recording pupils as repeating Year 10 or an earlier year; and changing from dual main registration to dual subsidiary registration prior to PLASC in Year 11. These are discussed in further detail below.

The review found that during the last six years, the percentage of Year 10 pupils on roll at maintained secondary and all-age schools, who do not progress to Year 11 has nearly doubled (from 2.3% to 4.2%). During the same period, the percentage of pupils who do not progress between other school years has only risen slightly.

In 2017-2018, the percentage of Year 10 pupils who repeated Year 10 is six times greater than the rate seen in 2013-2014 (from 0.09% to 0.55%). In many instances, pupils that repeat Year 10 do not then progress to Year 11 to finish their key stage 4 studies, but leave school after two years in Year 10.

Over the last six years, the percentage of pupils who are enrolled at a mainstream school in the January of Year 10 who then move to education other than at school (EOTAS) as main provider before the January of Year 11 has nearly doubled.

Pupils who are eligible for free schools meals, and those that have a statement of special educational needs or access school action plus provision, are far more likely not to progress from Year 10 to Year 11 than their peers.

During the last six years, there has also been an increase in the number of pupils in Wales who are being educated at home.
The Welsh Government should:

**R7** - Review the registration of EOTAS\(^1\) pupils and to consider using destination data to measure the effectiveness of EOTAS provision

**Accept** – we recognise the current approach to registration is not being applied as intended in all cases. This has resulted in a diversity of approaches being used to register EOTAS pupils and, following on, in data relating to the effectiveness of EOTAS provision not being as accurate as it could be. This, in turn, makes it difficult to monitor the effectiveness of EOTAS in terms of outcomes for pupils and makes it difficult to hold individual establishments to account for pupils’ outcomes.

We are currently developing a model to standardise EOTAS pupil registration. The model is being developed within the context of the new approach to accountability, which should reduce incentives for schools to use pupil registration in the ways identified by Estyn. The aim of standardisation is to create a registration system which provides accurate data, transparency and clear lines of responsibility and accountability.

Options for collecting data about the destinations of EOTAS pupils are currently being explored with Careers Wales.

**R8** - Work with local authorities to set up databases of compulsory age pupils in their area

**Accept** - We launched the consultation on the new local authority statutory guidance for Elective Home Education (EHE) on the 29 July closing on the 25 October. It is our intention to consult later in the year on draft regulations requiring local authorities to establish a database of all compulsory school aged children in their area in order to assist them in identifying those who are not on a school roll, education other than at school (EOTAS) register or on an independent school roll and who are not receiving a suitable education.

The primary policy intent behind our proposals is to ensure that home educated children in Wales are identified and receiving a suitable education. Whilst there are no new duties placed on local authorities, the statutory guidance represents a shift in current expectations of local authorities and will assist them to carry out their duty to ensure children receive a suitable education. The statutory guidance includes advice for local authorities on assessing the suitability of education and clarifies that the local authority should see the child as part of that assessment at least once a year unless there are other issues that justify more frequent meetings.

These proposal will ensure the approach to home education by local authorities is consistent, fair and transparent across Wales.

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\(^1\) Educated otherwise than at school
R9 - review arrangements for PLASC to ensure greater transparency of pupil movement

Reject – The Education (Information About Individual Pupils) (Wales) Regulations 2007 legislate on what individual level data can be collected by the Welsh Government and does not currently permit the collection of some specific movement data referred to in Estyn’s thematic report, such as destinations.

PLASC is continually reviewed and improved with the aims of reducing burdens on those submitting and validating returns, as well as to improve the robustness of the data collected by the Welsh Government. The administrative burden on schools, local authorities and Welsh Government associated with expanding or increasing the frequency of PLASC would not be in proportion with the likely benefits.

There are, however, analytical options that may be possible to explore in future. PLASC, along with other statutory data collections, such as the Educated Other Than At School (EOTAS), Children Receiving Care and Support Census (CRCSC), Lifelong Learning Wales Record (LLWR) and Higher Education Statistics Agency (HESA) collections, includes every individual learner’s unique pupil number (UPN). The UPN could, therefore, be used for analysis and the linking of existing data to analyse the destinations of particular learner groups.

Officials are also monitoring technological developments in the education sector, in particular relating to the transfer of learner data from one establishment to another. This includes non-maintained school provision, as well as the Department for Education’s recent pilot of the use of application programming interface (API) technology for the UK government’s data exchange system.

The report sets out the following recommendations for schools, governing bodies and local authorities:

Schools and governing bodies should:
R1 - ensure that pupils repeat Year 10 only under exceptional circumstances
R2 - routinely review registration practices and pupil movements as part of the school’s evaluation and improvement arrangements
R3 - ensure that governors monitor pupil movements between Years 10 and 11.

Local authorities should:
R4 - monitor the registration practices of schools to provide assurance that schools are always acting in the best interest of individual pupils
R5 - ensure that both local authorities and schools have clear criteria and protocols for allowing schools to register pupils as repeating Year 10
R6 - monitor and investigate any instances where pupils are repeating Year 10 or progressing from Year 10 into a school year other than Year 10 or Year 11.
The Education Directorate’s Support for Learners Division will write to local authorities to draw their attention to the recommendations placed on them and on schools by this report.

**Publication details.**
The report will be published on 25 October and can be found on Estyn’s website: [https://www.estyn.gov.wales](https://www.estyn.gov.wales)

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Mae’r ddogfen yma hefyd ar gael yn Gymraeg. This document is also available in Welsh.

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