

English National Ballet School

Attendance and Absence Policy

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Statement of intent

English National Ballet School believes that to facilitate teaching and learning, good attendance is essential. Students cannot achieve their full potential if they do not regularly attend school.

We understand that barriers to attendance are complex, and that some Students find it harder than others to attend school; therefore, we will continue to prioritise cultivating a safe and supportive environment at school, as well as strong and trusting relationships with Students and parents.

We take a whole-school approach to securing good attendance and recognise the impact that our efforts in other areas – such as the curriculum, behaviour standards, bullying, SEND support, pastoral support, and the effective use of resources such as InVentry and CPOMS – can have on improving student attendance.

We are committed to:

- Promoting and modelling high attendance and its benefits.
- Ensuring equality and fairness for all.
- Intervening early and working with other agencies to ensure the health and safety of our students.
- Building strong relationships with families to overcome barriers to attendance.
- Working collaboratively with other schools in the area, as well as other agencies.
- Ensuring parents follow the framework set in section 7 of the Education Act 1996, which states that the parent of every child of compulsory school age shall cause them to receive efficient full-time education suitable to their age, ability and aptitude, and to any SEND they may have, either by regular attendance at school or otherwise.
- Ensuring our attendance policy is clear and easily understood by all staff, parents and Students.
- Regularly monitoring and analysing attendance and absence data to identify Students or cohorts that require more support.

The school's Wellbeing and Safeguarding team can be contacted via emmamorgan@enbschool.org.uk or emmaferguson@enbschool.org.uk. Staff, parents and students will be expected to contact the Wellbeing Team for queries or concerns about attendance.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education Act 1996
- Equality Act 2010
- The Education (Student Registration) (England) Regulations 2006 (as amended)
- DfE (2022) 'Working together to improve school attendance'.
- DfE (2025) 'Children missing education'.
- DfE (2025) 'Keeping children safe in education 2025'.
- DfE (2023) Providing remote education

This policy operates in conjunction with the following school policies:

- Complaints Policy
- Safeguarding Policy
- Learning and Teaching Agreement 2025-26
- SEND Policy

Definitions

The following definitions apply for the purposes of this policy:

Absence

- Arrival at school after the register has closed.
- Not attending school for any reason.

Authorised absence

- An absence for sickness for which the school has granted leave.
- Medical or dental appointments which unavoidably fall during school time, for which the school has granted leave.
- Religious or cultural observances for which the school has granted leave.
- An absence for work experience or auditions for which the school has granted leave.
- An absence due to a family emergency.
- An absence to complete external academic examinations.

Unauthorised absence

- Parents or Guardians keeping children off school unnecessarily or without reason.
- Truancy before or during the school day.
- Absences which have never been properly explained.
- Absence due to shopping, looking after other children or birthdays.
- Absence due to day trips and holidays in term-time which have not been agreed or authorised in advance.

Persistent absence (PA)

- Children who are absent for 10 percent or more of schooling across the year for any reason.

Roles and responsibilities

The governing board has overall responsibility for:

- Monitoring the implementation of this policy and all relevant procedures across the school.
- Promoting the importance of good attendance through the school's ethos and policies.
- Arranging attendance training for all relevant staff that is appropriate to their role.
- Working with the Head of Wellbeing and Safeguarding to set goals for attendance and providing support and challenge around delivery against those goals.
- Ensuring that this policy, as written, does not discriminate on any grounds including, but not limited to, ethnicity/national origin, culture, religion, gender, disability, or sexual orientation.
- Handling complaints regarding this policy as outlined in the school's Complaints Policy.
- Having regard to 'Keeping Children Safe in Education' when making arrangements to safeguard and promote the welfare of children.
- Ensuring there is a Safeguarding Policy in place and that this is regularly reviewed and updated.

The Head of Wellbeing and Safeguarding is responsible for:

- The day-to-day implementation and management of this policy and all relevant procedures across the school.
- The overall strategic approach to attendance within the school.
- Developing a clear vision for improving attendance.
- Ensuring all parents and guardians are aware of the school's attendance expectations and procedures.
- Ensuring that every student has access to full-time education and will act as early as possible to address patterns of absence.

Staff are responsible for:

- Following this policy and ensuring Students do so too.
- Where designated, taking the attendance register at the relevant times during the school day.
- Ensuring this policy is implemented fairly and consistently.
- Modelling good attendance behaviour.
- Using their professional judgement and knowledge of individual Students to inform decisions as to whether any welfare concerns should be escalated.

The Wellbeing and Pastoral Practitioner is responsible for:

- Monitoring attendance and the impact of interventions.

- Analysing attendance data and identifying areas of intervention and improvement.
- Communicating with Students and parents regarding attendance.
- Following up on incidents of persistent poor attendance.

Parents and Guardians are responsible for:

- Providing accurate and up-to-date contact details.
- Providing the school with more than one emergency contact number.
- Updating the school if their details change.
- The attendance of their children at school.
- Promoting good attendance with their children.

Students are responsible for:

- Attending every timetable lesson and any agreed activities when at school.
- Arriving punctually to all lessons when at school.
- Following the School's absence reporting procedures.

Attendance expectations for students

Guidance regarding lateness and absence and subsequent consequences are intended to encourage students to appreciate the importance of punctuality and attendance.

Warm-up

Students are always expected to arrive in time for their warm-up before class, this is a must. If a student is going to be late, they must write an email to their teacher informing them and explaining the reason behind their lateness.

If a student is not present in the studio at the start of the timetabled morning warm-up before ballet class, this may result in the teacher marking them as late or absent on the register.

Lateness

Joining Late for Morning Ballet Class: If a student arrives during the pre-class warm-up slot, they may join the class, complete the set warm-up at their pace, and then join the barre exercises. However, if they arrive after the first couple of exercises at the barre, they may be considered too late to participate and must observe the class.

Subsequently, they are not permitted to join any other dance classes taught by the teacher on that day. Whether a student is permitted to take class is at the teacher's discretion and dependant on the context.

Late Arrival to Other Classes: For any student who is late to any class during the day, the teacher will inquire about the reason for lateness, remind them of the importance of punctuality, ensure they are adequately warmed up before participating, and mark them as late in the register.

Absences

Students are encouraged to attend classes in order to maximise their progress and performance potential. Students should aim for as full attendance as possible and

those without any unauthorised absences will be recognised at the end of the academic year and termly by tutor.

Sickness: While we value attendance, we also value health. Where illness occurs, students are encouraged to prioritise their health needs, recover, and to consult a doctor whenever necessary.

Proactive Health Maintenance: Students are encouraged to take a proactive approach to maintaining good health through practices such as adequate sleep, nutrition, and rest to ensure maximum attendance.

Impact of Absences: Absence can impact on a student's training, possibly resulting in them being excluded from first-cast performances if reliability is affected due to absences during the rehearsal period.

Recurrent Illnesses: Recurrent illness is a sign of poor health or not being able to cope with the training load. In cases of recurrent illness, students will be asked to speak to the Head of Healthcare.

Consequences

Repeated Lateness and Absences: If a student's attendance drops below 90%, this will be escalated to the Head of Wellbeing and Safeguarding who will arrange a meeting with the student and their Tutor to discuss the reasons for the drop in attendance and its impact on their training. Where the absence is health related, the student will be asked to meet the Head of Healthcare who will refer the student to the Sports Doctor/GP or relevant specialist.

Pattern of Lateness: If a student is late for lessons more than three times in a term, they must also have a meeting with the Artistic Director and their Tutor.

Parents will receive an update on student attendance with their young person's School report; this will highlight any absences or lateness.

Absence procedures

Students will be required to email the School by **8:30am** on the first day of their absence.

Students must report all absences, including pre-authorised or unforeseen absence to the email address in correlation to their year group (below). All relevant academic, artistic and support staff will be notified of the absence.

If the absence involves a wellbeing or healthcare concern that the student does not wish to share with all staff members on the distribution list, then the student must send a brief to the distribution email and then separately contact the Wellbeing team or Healthcare team with more details. Students are expected to provide an explanation for the absence and an estimation of how long the absence will last, e.g., one school day. Students are required to contact the school each day of absence, even if this is consecutive days.

1st years: firstyearabsence@enbschool.org.uk

2nd years: secondyearabsence@enbschool.org.uk

3rd years: thirdyearabsence@enbschool.org.uk

Where a student is absent and has not contacted the school to report the absence, student support staff will contact the student via telephone call and email as soon as is practical on the first day that the student does not attend school. If the member of staff cannot contact the student, then the student's parent or guardian will be contacted, if they cannot be reached then the students' other contact or emergency contact will be contacted.

The School will always follow up any absences to:

- Ascertain the reason for the absence.
- Ensure any necessary safeguarding action is taken.
- Identify whether the absence is authorised or not.

Where a student has unauthorised absent for more than three school days in a row, or more than 10 school days in one term, the student's parent will be contacted to discuss the issue and will be expected to provide a signed letter with an explanation for the absence(s).

The school will not request medical evidence in most circumstances where a student is absent due to illness; however, the school reserves the right to request supporting evidence where there is genuine and reasonable doubt about the authenticity of the illness.

In the case of PA, arrangements will be made for parents to speak to the Wellbeing and Safeguarding team. Any absence concerns, for example a repeating pattern of absences, will be communicated to the parents. Students will always be supported and, wherever possible, barriers removed to ensure students are able to achieve to the highest standards.

If a student's attendance drops below 85 percent, the Wellbeing and Pastoral Practitioner will arrange a formal meeting with the student, their tutor, the Artistic Director, and if appropriate their parent.

Additional Classes, Performances, or Summer Schools/Intensives

Students must ensure they have authorisation from the School before attending any additional ballet/dance classes during the term. They must also obtain authorisation before participating in non-ENBS performances and Summer Schools or Intensive Programmes. This ensures that the additional activities/opportunities are appropriately matched to the students' technical ability, are in line with the School's artistic vision and aims and also ensures that students do not engage in training beyond the School's curriculum.

Generally, students should not participate in extra classes during term time; however, in certain circumstances, this may be allowed.

During the summer break, students will only be authorised to take part in a **maximum of two weeks** of either an intensive programme, summer course, or performance preparation. This ensures that students return to School recovered and ready for the next academic year.

Students can request permission for any of the above activities by emailing their Tutor, the Artistic Director, the Head of Healthcare, and Student Support Services if during

term time. ENBS aims to have the necessary members of staff review the request promptly.

Audition Requests / Authorisation

ENBS is committed to supporting students in securing employment opportunities. However, it is essential that students request permission to miss School when they have auditions. Additionally, to safeguard students in the rehabilitation process and prevent further injury, students must consult with the Healthcare Team before accepting an audition invitation.

Students are required to request permission for any of the above activities by emailing their Tutor, the Artistic Director, and the Head of Healthcare. We aim to respond to the request promptly.

In addition, when requesting to attend an audition, students must provide the School with the following information:

- Location of the audition (Company/ Programme details)
- Date of the audition
- Proposed date of travel and return date to ENBS

Students must always request authorisation to attend an audition, even if it takes place outside of term time.

Travel and Time Off Arrangements

For auditions, the travel date must be the day before the audition or a maximum of two days before if the audition is in a different continent. The return date must be the day after the audition at the latest. If there is a special reason for deviating from this schedule (such as high travel prices), the student needs written authorisation from their Tutor before making travel arrangements.

Students should receive a day off after an audition if either the traveling day or the audition takes place on a Sunday. However, if the traveling or audition occurs during the week, students will not get a day off unless they are traveling to a different continent (outside Europe). For auditions in or near London, students will only get a day off if the audition is on a Sunday.

If students need to deviate from any of these guidelines for any reason, they should obtain written authorisation before making travel arrangements or requesting a day off. Failure to comply with the procedure may result in consequences as reasonably determined by the Artistic Director on a case-by-case basis.

Accepting a Short-Term Contract or Job during ENBS Term Time

Students are expected to consult their Tutor and the Artistic Director before accepting any contracts that must be taken up before the end of the school term. The Artistic Director, in conjunction with the Head of Studies, will make this decision, taking into consideration the student's desire to complete the course and their future career prospects.

Attendance register

The school uses electronic registers to keep attendance registers to ensure they are as accurate as possible and can be easily analysed and shared with the appropriate authorities.

Tutors and teachers will take the attendance register at the start of each lesson. This register will record whether students are:

- Present
- Late
- Ill
- Watching
- Medical / Injured (authorised absence)
- Authorised absence
- Unauthorised absence
- N/A (i.e. students who are not enrolled in Benesh).

Every entry received into the attendance register will be preserved for three years.

Pupils who are absent from School but are receiving remote education for any reason will be marked as absent in the register.

Authorising absence requests

Students and/or parents will be required to request certain types of absence in advance. Where possible we encourage students to take responsibility for requesting authorised absences to encourage the development of their professional standards. All requests for absence will be administered by the Wellbeing and Safeguarding team and handled by the Artistic Director and the Head of Healthcare – the decision to grant or refuse the request will be at the discretion of these staff members, taking the best interests of the student and the impact on the student's education into account. This decision is not subject to appeal; however, the school will be sympathetic to requests for absence by students and parents and will not deny any request without good reason.

Leave of absence

The school will only grant a student a leave of absence in exceptional circumstances. To have requests for a leave of absence considered, the school will expect students/parents to contact the Head of Wellbeing and Safeguarding in writing at least two weeks prior to the proposed start date of the leave of absence, providing the reason for the proposed absence and the dates during which the absence would be expected to occur.

Any requests for leave during term time will be considered on an individual basis and the student's previous attendance record will be considered. Where the absence is granted, the Head of Wellbeing and Safeguarding will determine the length of time that the student can be away from school. The school is not likely to grant leaves of absence for the purposes of family holidays.

Requests for leave will not be granted in the following circumstances:

- Immediately before and during assessment periods, rehearsal periods or performances.
- When a student's attendance record shows any unauthorised absence

- Where a student's authorised absence record is already above 10 percent for any reason

If term-time leave is not granted, taking a student out of school will be recorded as an unauthorised absence. The school cannot grant leaves of absence retrospectively; therefore, any absences that were not approved by the school in advance will be marked as unauthorised.

Illness and healthcare appointments

Students/parents will be expected to make medical or dental appointments outside of school hours wherever possible. Where this is not possible, students/parents will be expected to obtain approval for their absence to attend such appointments as far in advance as is practicable. Parents and Guardians will be responsible for ensuring their child misses only the amount of time necessary to attend the appointment.

Religious observance

Students/parents will be expected to request absence for religious observance at least two weeks in advance.

The school will only accept requests for absence on grounds of religious observance for days that are exclusively set apart for religious observance by the relevant religious body. The school will define this as a day where the student's parents would be expected by an established religious body to stay away from their employment to mark the occasion.

The school may seek advice from the religious body in question where there is doubt over the request.

Gypsy, Roma and Traveller absence

Where a student's parent belongs to a community covered by this code and is travelling for occupational purposes, the parent will be expected to request a leave of absence for their child at least two weeks in advance. Absences will not be granted for Students from these communities under this code for reasons other than travel for occupational purposes.

SEND and health-related absences

The school recognises that Students with SEND and/or health conditions, including mental health issues, may face greater barriers to attendance than their peers, and will incorporate robust procedures to support Students who find attending school difficult.

In line with the SEND Policy, the school will ensure that reasonable adjustments are made for disabled Students to reduce barriers to attendance, in line with any EHC plans that have been implemented. The school will secure additional support from external partners to help bolster attendance where appropriate.

Where the school has concerns that a student's non-attendance may be related to mental health issues, parents will be contacted to discuss the issue and whether there are any contributory factors to their child's lack of attendance. Where staff have a mental health concern about a student that is also a safeguarding concern, they will inform the DSL, and the Safeguarding Policy will be followed. All Students will be supported with their mental health in accordance with the school's procedures.

If a student is unable to attend school for long periods of time due to their health, the school will:

- Help the student reintegrate at school when they return.
- Make sure the student is kept informed about school events and activities.
- Encourage the student to stay in contact with other Students during their absence.

The school will incorporate an action plan to help any Students with SEND and/or health issues cope with the stress and anxiety that attending school may cause them. Such plans will be regularly monitored and reviewed until the student is attending school as normal and there has been signs of significant improvement.

To support the attendance of Students with SEND and/or health issues, the school will consider:

- Holding termly meetings to evaluate any implemented reasonable adjustments.
- Incorporating a pastoral support plan.
- Carrying out strengths and difficulties questionnaire.
- Identifying Students' unmet needs through the Common Assessment Framework.
- Using an internal or external specialist.
- Enabling a student to have a reduced timetable.
- Ensuring a student can have somewhere quiet to spend lunch and breaktimes.
- Implementing a system whereby Students can request to leave a classroom if they feel they need time out.
- Temporary late starts or early finishes.
- Phased returns to school where there has been a long absence.
- Small group work or one-to-one lessons.
- Tailored support to meet their individual needs.

Truancy

Truancy will be considered as any absence of part, or all, of one or more days from school, during which the school has not been notified of the cause behind such absence.

All staff will be actively engaged in supporting the regular attendance of Students and understand the importance of continuity in each student's learning.

Immediate action will be taken when there are any concerns that a student might be truanting. If truancy is suspected, the Head of Wellbeing and Safeguarding is notified, and they will contact the parent to assess the reasons behind the student not attending school.

- The following procedures will be taken in the event of a truancy: In the first instance, a letter of warning will be sent to the parents of the student, informing them of the truancy and stating that any future occurrences could result in further action being taken.
- If any further truancy occurs, then the school will consider a formal warning meeting with the student and a parent. The formal warning would then remain on the student's record.
- If truancy still occurs, then the School will discuss further with the student and the parent(s) the needs of the student, and whether the course is the right one for the child.

Attendance intervention

To ensure the school has effective procedures for managing absence, the Wellbeing and Safeguarding team will:

- Establish a range of specific, evidence-based interventions to address barriers to attendance.
- Monitor the implementation and quality of escalation procedures and seek robust evidence of the escalation procedures that work.
- Attend or lead attendance reviews in line with escalation procedures.
- Establish robust escalation procedures which will be initiated before absence becomes a problem by:
 - Sending letters to parents.
 - Having a weekly tutor review.
 - Creating attendance clinics.

The school will use attendance data, in line with the 'Monitoring and analysing absence' section of this policy, to develop specific strategies to improve attendance where patterns of absence are emerging. These strategies will be developed on a case-by-case basis and will consider the particular needs of the students whom the intervention is designed to target.

The school will aim to improve attendance in the overall school cohort by acknowledging good attendance.

School trips and events will be considered a privilege. Where attendance drops below 90 percent, these privileges may be taken away. The school will develop strategies for

ensuring that Students with health needs or home circumstances that result in additional absences are not unfairly excluded from attendance rewards, e.g., by setting individualised targets.

Working with parents to improve attendance

The school will work to cultivate strong, respectful relationships with parents and families and work to build trust and engagement. Open and honest communication will be maintained with Students and their families about the expectations of school life, attendance, and performance so that they understand what to expect and what is expected of them. The school will liaise with other agencies working with Students and their families to support attendance, e.g., social services.

The school will ensure that there are two sets of emergency contact details for each student wherever possible to ensure the school has additional options for getting in touch with adults responsible for a student where the student is absent without notification or authorisation.

The school will ensure that parents are aware of their legal duty to ensure that their child attends school regularly and to facilitate their child's legal right to a full-time education – parents will be made aware that this means their child must attend school every day that it is open, save for in certain circumstances, e.g. sickness or absences that have been authorised by the Artistic Director, Head of Healthcare or Head of Wellbeing and Safeguarding in advance. The school will inform parents about their child's levels of attendance, absence, and punctuality in the bi-annual School report, and will ensure that parents are aware of the benefits that regular attendance at school can have for their child educationally, socially and developmentally.

If a pattern of absence becomes problematic, the School will work collaboratively with the student and their parents to improve attendance by addressing the specific barriers that prevent the student from being able to attend school regularly. The school will always take into consideration the sensitivity of some of the reasons for student absence and will approach families to offer support rather than immediately reach for punitive approaches.

Where these barriers are related to the student's experience in school, e.g., bullying, the Wellbeing and Safeguarding team and any relevant school staff, to address this. Where the barriers are outside of the school's control, e.g., they are related to issues within the student's family, the School will liaise with any relevant external agencies or authorities, e.g., children's social care, and will encourage parents to access support that they may need.

Persistent Absence (PA)

Defined as being absent for 10 percent or more of schooling across the year for any reason. There are various groups of Students who may be vulnerable to high absence and PA, such as:

- Children in need
- Looked after child (LAC)
- Young carers
- Students who are eligible for Free School Meals
- Students with EAL
- Students with SEND
- Students who have faced bullying and/or discrimination.

The school will ensure it provides support to Students at risk of PA, in conjunction with all relevant external authorities where necessary. The school will use a number of methods to help support Students at risk of PA to attend school. These include:

- Offering catch-up support to build confidence and bridge gaps in learning.
- Meeting with the student and their parent to discuss patterns of absence, barriers to attendance, and any other problems they may be having.
- Establishing plans to remove barriers and provide additional support.
- Leading weekly check-ins to review progress and assess the impact of support.
- Making regular contact with the student's parent to discuss progress.
- Assessing whether an EHC plan or IEP may be appropriate.
- Considering what support for re-engagement might be needed, including regarding additional vulnerability.

The school will focus particularly on Students who have rates of absence over 75 percent and will work with the Local Authority and other partners to engage all relevant services needed to identify and address the wider barriers to attendance these Students are facing.

Where a student at risk of PA is also at increased risk of harm, the school will work in conjunction with all relevant authorities, e.g., social services, to support the student in line with the school's duty of care. The school will also bear in mind that the continuation of severe PA following intervention may constitute neglect and will escalate any concerns in this regard in line with the Safeguarding Policy.

Monitoring and analysing absence

The School will monitor attendance weekly and analyse attendance data half-termly to ensure that intervention and support is delivered quickly to address habitual absence at the first signs.

The school will collect data regarding punctuality, authorised and unauthorised absence, for:

- The school cohort.
- Individual tutor groups.
- Individual Students.

The school will also look to develop records that indicate where individual students have SEND, LAC or at risk of PA.

The Head of Wellbeing and Safeguarding will conduct thorough analysis of the above data on a termly and full-year basis to identify patterns and trends. This will include identifying, for each tutor group:

- Patterns of types of absence e.g., illness, physio.
- Particular days of poor attendance.
- Subjects which have low lesson attendance.
- Historic trends of attendance and absence.
- Barriers to attendance.

The Wellbeing and Pastoral Practitioner will provide reports to staff across the school to enable them to track the attendance of Students and to implement attendance procedures. The Wellbeing and Pastoral Practitioner will also be responsible for monitoring how attendance data changes in response to any interventions implemented to increase attendance in future.

The governing board will regularly review attendance data, including examinations of recent and historic trends, and will support the Head of Wellbeing and Safeguarding in setting goals and prioritising areas of focus for attendance support based on this data.

Training of staff

The school will recognise that early intervention can prevent poor attendance. As such, staff will receive training in identifying potentially at-risk Students as part of their induction training. The governing board will ensure that teachers and support staff receive training in line with this policy as part of their induction. Following this initial training, staff will be offered regular and ongoing training as part of their CPD opportunities.

Training will cover at least the following:

- The importance of good attendance
- That absence is almost invariably a result of wider circumstances.
- The legal requirements on schools, e.g., the keeping of registers.
- The school's strategies and procedures for monitoring and improving attendance.
- The school's procedures for multi-agency working to provide intensive support for Students who need it.

The School will provide attendance training to the Wellbeing and Pastoral Practitioner – this will include training regarding interpreting and analysing attendance data and supporting Students to overcome barriers to attendance.

Staff will receive training to ensure they understand that increased absence from school could indicate a safeguarding concern and know how such concerns should be managed.

Monitoring and review

Attendance and punctuality will be monitored throughout the year. The school's attendance target is 97 percent.

This policy will be reviewed annually by the Head of Wellbeing and Safeguarding and presented formally to the Wellbeing and Safeguarding sub-committee. The next scheduled review date for this policy is September 2026.

Any changes made to this policy will be communicated to all relevant stakeholders.

Document Change History

This is version 4.0 of English National Ballet School's Attendance and Absence Policy. This policy is for internal and external use.

This policy is subject to regular revision and maintained electronically. Electronic copies are version controlled.

The most recent version is listed first.

Version: 4.0	Date of Change: 02/10/2025
Section Title:	Change:
Whole Document	General update.
Version: 3.0	Date of Change: 29/10/2024
Section Title:	Change:
Whole Document	Changed wording around attendance expectations.
Version: 2.0	Date of Change: 01/08/2024
Section Title:	Change:
Whole Document	General update of Student Attendance Expectations and Absence procedures to include additional classes, performance, and auditions.
Version: 1.0	Date of Change: 13/04/2023
Section Title:	Change:
Whole Document	Policy created and approved by Board of Governors.