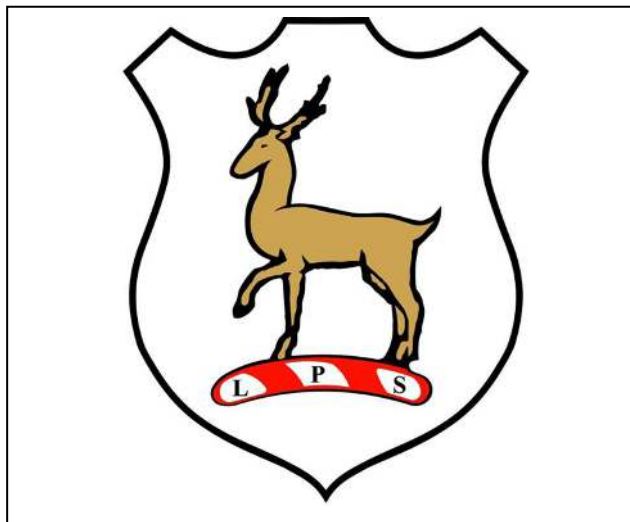


# Ysgol Gynradd Llandyfai



## School Attendance Policy

Version	Version 1 – 29 <sup>th</sup> Dec 2023
Date	January 2024

<b>Date of policy implementation and ratified by Governing Body:</b>	January 16 <sup>th</sup> 2024
<b>GB member/staff responsible for policy review:</b>	Mr M. Ridout and Mr S. Thomas
<b>GB Link Governor:</b>	Mrs Kathleen Phillips
<b>Date of creation:</b>	January 2024
<b>Date of review:</b>	January 2025
<b>Date review completed:</b>	
<b>Date of next review:</b>	

### Policy Control

<b>Policy Title:</b>	Primary School Attendance Policy for Pupils
<b>Author:</b>	Mr S. Thomas
<b>Date of policy implementation:</b>	January 2024
<b>Staff responsible for review:</b>	Head teacher
<b>Link Governor:</b>	Mrs Kathleen Phillips
<b>Owner:</b>	Head teacher
<b>Review Cycle:</b>	Annually
<b>Start date for next review:</b>	January 2025

### Policy Revision History

<b>Date</b>	<b>Version</b>	<b>Lead Reviser</b>	<b>Additional Revisers</b>	<b>Description</b>	<b>Date ratified by full GB</b>

## **1. Mission statement**

Lamphey Primary School is committed to providing a full and efficient education to all pupils and embraces the concept of equal opportunities for all.

We will provide an environment where all pupils feel valued and welcomed and are committed to the fundamental principle that early intervention and partnership working is crucial in ensuring the attendance, protection and wellbeing of all children.

The school will follow the [All Wales Child Safeguarding procedures](#) and local protocols in relation to specific and identifiable wellbeing issues that prevent a child from accessing education, or where there are safeguarding concerns.

For a pupil to reach their full educational achievement, a high level of school attendance is essential. We will consistently work towards a goal of 100% attendance for all pupils. Every opportunity will be used to convey to pupils and their parents or carers the importance of regular and punctual attendance.

School attendance is subject to education law and guidance and our school attendance policy is written to reflect this legislation and the guidance produced by the Welsh Government. For information relating to this legislation and guidance, see Appendix 2.

The legislation makes provision for a school day which is to be divided into two sessions with a lunch break in the middle and to be available for 190 days in any school year. Registration will take place at the start of the morning session and following the last lunch period.

The school will review its systems for improving attendance on an annual basis to ensure that it is achieving its set goals and targets as identified by the Governors, local authority, Consortium and the Welsh Government.

This policy will contain the procedures that the school will use to work towards meeting its attendance targets, as set by the local authority.

## **2. Promoting attendance**

The foundation for good attendance is a strong partnership between the school, parents, carers and pupils.

We will ensure that our pupils are made aware of the importance of good attendance and how this will benefit them, both now and in the future; we will offer reward schemes for individual learners, classes and year groups who have high levels of school attendance, no unauthorised absence and/or have shown to significantly improve their attendance rates.

We will use a variety of strategies to intervene at an early stage to encourage improved attendance of individual pupils and assist to overcome any barriers that may be preventing the expected level of attendance. These strategies may be school-based, or may be implemented jointly with other partners to ensure the most appropriate support for the individual and their family.

The home school agreement will contain details of how we will work with parents and carers and our expectations of what they will need to do to ensure pupils' achieve good

attendance. These expectations and potential consequences of not meeting the expectations will be regularly communicated to parents throughout the academic year in various ways such as text messages, the school website, newsletters and at parents' evenings.

### **3. School procedures**

Any pupil who is absent from school at the morning or afternoon registration period will have their absence recorded as being authorised, unauthorised or as an approved educational activity (attendance out of school). Only the head teacher, or a member of staff acting on their behalf, can authorise absence.

If there is no known reason for the absence at registration, then the absence will be recorded in the first instance as unexplained (N code) and promptly followed up by the school as part of its early intervention and safeguarding strategies. This will be in the form of a text message, telephone call or letter to the parent or carer to enquire about the whereabouts of the pupil. If no reason is given by the end of 5 school days or the reason given is not reasonable, the pupil will be recorded as an unauthorised absence (O code).

The coding for any absences will be in accordance with the guidance provided by the Welsh Government's All Wales Attendance Framework as in Appendix 1.

### **4. Punctuality**

Morning registration will take place at the start of school at 9.00 am. The registers will remain open for a maximum of 30 minutes from this start time, in accordance with Welsh Government guidance. Any pupil arriving after this time will be marked as having an unauthorised absence (U code) unless there is an acceptable explanation i.e. school transport was delayed. In addition, where the absence at registration was for attending an early morning medical appointment, the appropriate authorised absence code will be entered (M code in this instance).

Pupils arriving after the start of school but before the end of the 30 minute registration period will be coded as late (L code).

Afternoon registration will be at 1.15pm and any pupil arriving after this time will be marked as present but late (L code) if they arrive within 30 minutes, or an unauthorised absence (U code) if they arrive more than 30 minutes after the start of the afternoon session.

In the event of three late arrivals, the school will contact the parent by letter to inform them of the impact on their child's attendance and subsequent attainment. Should the pupil continue to arrive late for registration after being issued with this letter, the school will issue a second letter inviting the parent or carer to a meeting to discuss the barriers that are preventing punctual arrival and offer support where appropriate. Following this meeting, if the pupil is late again, parents and carers will be invited to a meeting with the head teacher or attendance lead together with the Link Governor for Attendance to discuss the matter and possibly take further action.

Parents and carers are reminded that the local authority may issue a fixed penalty notice for persistent lateness after the close of the register in accordance with the local authority's Code of Conduct for the Issuing of Fixed penalty Notice for Non-School

Attendance, if the number of unauthorised absences or lates (O or U codes) is 10 sessions or greater in the current term.

## **5. First day absence**

Parents and carers are reminded that they should contact the school by 9:00am if their child is not able to attend school on that day. Parents and carers must state the **full** reason for the child's non-attendance (not just "feeling unwell") and indicate the likely date they will return to school. Parents/carers should be prepared for members of the school staff to ask questions about the pupil's condition, the patterns or trends in their absences and any treatment they may be receiving.

If a parent or carer does not contact the school, staff will endeavour to ascertain the specific reason for non-attendance as soon as possible on the first day of absence, after both morning and afternoon registration. This may include a telephone call, texting service, a home visit from a member of school staff or an Education Welfare Officer. Once the specific information is received, the register will be amended to reflect the appropriate absence code (see Appendix 1 for the types of code).

Priority will be given to children who are deemed to be particularly vulnerable, e.g. those known to Children's Services or are looked after (LAC). The local authority's Education Welfare Service will be notified of unexplained absences of five days or more, which will be reduced to only 24 hours if the pupil is on the child protection register, who may conduct an unscheduled home visit to determine if the pupil is safe and well.

Any learner may be subject to a visit from the Education Welfare Service where the school has any concern around attendance, or lack of contact from parents. These visits are intended to offer the right support to overcome any barriers to attending schools.

## **6. Absence notes and supporting evidence**

Notes received from parents explaining the reason for the absence will be kept on file in line with school retention policies. Parents and carers are aware that only the head teacher or their representative can authorise an absence and that further information such as a letter/appointment card from a GP or consultant may be required to support reasons given for absence.

## **7. Medical and illness absences**

The school appreciates that there are times a pupil has to attend a medical appointment during the school day. In these instances, a copy of the hospital appointment letter should be provided to the school **prior** to appointment date to inform the school of the set scheduled time. This, however, does not apply to routine GP or dental appointments, which can and should be arranged for times outside of the school day.

If a pupil is repeatedly absent due to illness, the school may request supporting evidence that the pupil is receiving the necessary medical treatment. An appointment card, consultant letter, photograph of prescription medication, would all suffice as medical evidence. Without the necessary evidence, the school may notify the parent or carer that all future absences will be unauthorised until the necessary medical evidence has been provided, and a referral to the Education Welfare Service may be made.

## **8. Continuing and frequent absence**

Within the school it is the responsibility of the class teacher/registration tutor or attendance officer to be aware of and bring attention to the head teacher (or person to whom they have delegated responsibility for attendance), any emerging attendance concerns.

In cases where a pupil begins to develop a pattern of absences, the school will try to resolve the problem as soon as possible. This may involve inviting the parents/ carers and the pupil into school for a meeting. However, should this absence persist a referral will be made to the Education Welfare Service when the attendance drops below 90% for the preceding six school weeks. (The percentage should be agreed with your LA)

For unauthorised absences of 10 sessions or more in a school term (there are two sessions in a day, morning and afternoon), the local authority may issue a fixed penalty notice in accordance with the local authority's Code of Conduct.

## **9. Persistent absence**

Welsh Government defines persistent absence as pupils whose absence level is more than 10% (less than 90% attendance). These pupils will be subject to an action plan to support their return to full attendance. This plan may include a referral to the Education Welfare Service for additional support for the pupil and their family.

If the pupil and family do not engage with the action plan, court action may be taken against the main parent(s) or carer(s) via the Education Welfare Service.

## **10. Absence related to discrimination**

A pupil's absence from school may be due to bullying, which can take many forms and can be direct (either physical or verbal) or indirect, for example, ignoring a pupil or not talking to them. Some of this bullying may be discriminatory.

As a school, we will monitor and report all discriminatory incidents each term and if the reason for a pupil's absence is related to any of the above issues, we will take action to deal with the situation.

## **11. Leave of absence/holidays in term time**

Leave of absence during term time is actively discouraged as it negatively impacts on the pupil's ability to engage with the full curriculum. Parents and carers do not have the automatic right to withdraw their children from school for a family holiday and will be reminded of the effect that absence can have on a pupil's potential achievement.

The school will consider any application for leave of absence; parents and carers must apply in advance for permission for their child to have leave of absence (four weeks minimum notice for a family holiday). Forms to request a leave of absence can be obtained from the school, either in paper copy from the school office or from the school website. The head teacher will consider the request and respond in writing within 5 school days to inform the parent or carer whether the request has been authorised. Subsequently, a parent or carer can make an informed decision whether they wish to pursue the absence in the knowledge of any potential consequences.

Parents and carers are advised that a fixed penalty notice may be issued by the local authority when permission for a holiday or leave of absence has not been authorised by the school. The local authority's Code of Conduct for Issuing Fixed Penalty Notices can be obtained from the school, the local authority's website or the Education Welfare Service.

## **12. Fixed Penalty Notices for Non-Attendance at School**

The school may request the local authority to issue fixed penalty notices where a parent/carer has failed to secure their child's regular attendance at school. A penalty notice can be requested against one of the following criteria:

1. Where there is a minimum of 10 unauthorised sessions (5 school days) in the current term (these do not need to be consecutive) which may or may not include pupils who are persistently arriving after the close of the registration period (Recommended that registers be kept open for thirty minutes);
2. Where a parent(s)/carer(s) refuses to engage with a school in the interest of improving their child's school attendance levels;
3. Where a pupil is repeatedly caught truanting in public places during school hours (Police can request a penalty notice be issued for this offence);
4. Where a holiday in term time has been requested but has been unauthorised.

To comply with [The Education \(Penalty Notices\) \(Wales\) Regulations 2013](#), Lamphey Primary school will operate in accordance with the local authority's Code of Conduct for fixed penalty notices for regular non-attendance at school. It remains the discretion of the head teacher to authorise absences in line with The Education (Pupil Registration) (Wales) Regulations 2010 attendance codes and supplementary guidance provided by the local authority.

Each pupil's absence will be considered on its own merits and if appropriate, a fixed penalty notice may be requested to encourage improved future attendance. If a pupil's attendance is significantly low, a referral to the Education Welfare Service may be considered as an alternative to requesting a penalty notice.

## **13. Reintegration**

The school will welcome back all pupils on return from an absence. This will include ensuring that the pupil is helped to catch up on missed work and brought up to date on any information that has been passed to the other pupils.

If the pupil has been absent for a considerable period of time, a reintegration plan will be introduced tailored to the needs of the individual.

## **14. Roles and responsibilities**

Lamphey Primary School is aware that ensuring regular school attendance is a demanding area of work that depends on establishing and utilising close working relationships between parents/carers, pupils, schools, the local authority and other professionals who work with children.

A key part of any successful working relationship is a clear understanding of each person's role and responsibilities, and as such the following sets out to clarify the roles and responsibilities for those people engaged with tackling absence issues.

#### 14.1 The Parent/Carer

Under section 7 of the Education Act 1996, the parent/carers is responsible for ensuring that their child of compulsory school age receives efficient full-time education that is suitable to their child's age, ability and aptitude and to any special educational needs the child may have. This can be by regular attendance at school, alternative provision or by elective home education (the parent can choose to provide education for their child).

A pupil's punctuality is also a legal requirement and parents/carers of a pupil who is persistently late (after the close of the register) can also face legal proceedings. Sometimes, there are situations at home that may make it difficult for a pupil to arrive on time and as such due consideration is given to any help or assistance a family may need in these circumstances.

#### 14.2 The School

Schools are required under the Education (Pupil Registration) (Wales) Regulations 2010 to take an attendance register twice a day; at the **start** of the morning session and once during the afternoon session. The accuracy of the register is important in order to support any statutory interventions that may be required. It should be noted that it is an offence not to maintain accurate registers.

The school has the responsibility to monitor individual attendance rates at least weekly and use their own intervention methods to tackle individual pupil attendance issues where the pupil's attendance rate is 91% and above. A referral to the Education Welfare Service should be made by the school when an individual's attendance falls to 90% or below over a **six-week period** and there is no exceptional reason for this (i.e. the majority of the absence is unauthorised). See point 12.

Head Teachers will be responsible for the strategic management of attendance across the school. They will scrutinise the data on a weekly basis, monitor trends and patterns across cohort of pupils, and evaluate interventions for their impact and effectiveness and direct resources for the best possible outcome. The Head Teacher will present the data to the Governing Body on a termly basis for scrutiny.

Class Teachers will be responsible for completing the session registers fully and accurately during every registration. This practice ensures good safeguarding processes, enabling the school to know where every pupil is at the start of all sessions and for school clerks/office managers to commence the 'first day response' process if the pupil is not present. SIMS notes fields should be used to ensure that the additional details relating to the absence are captured and retained on file.

Attendance Officer/School Clerk/Office Manager will be responsible for the daily operational attendance duties. They will ensure that all registers have been completed by the classroom teachers on a daily basis and if not will escalate this to the Head Teacher for action. They will undertake the 'first day response' on each morning for those pupils whose families have not made contact. They will collate the supporting evidence, and chase any outstanding forms, absence notes, holiday request forms etc. The officers will



compile the data in preparation for analysis by the Head Teacher and make the referrals to the Education Welfare Service.

In order to request a fixed penalty notice, the school will monitor the individual attendance patterns of their pupils. If trends are identified that match the criteria stated in the local authority's Code of Conduct, a school has the opportunity to make a formal request to the local authority to issue a penalty notice.

### 14.3 The Education Welfare Service (EWS)

The principal function of the Education Welfare Service is to improve attendance in all schools and alternative education provisions across the local authority by supporting pupils and their families to overcome their barriers to engagement.

The service provides support to schools, pupils and their families to ensure regular attendance and address any difficulties relating to absenteeism. The Education Welfare Service works collaboratively with a range of support services and agencies and provides an essential link between home and school to ensure that pupils benefit from the educational opportunities available to them.

The service acts on behalf of the authority in its statutory enforcement capacity and is responsible for a number of related duties that include:

- the regulating and issuing of child employment and performance licenses for school age children and young people, and their chaperones;
- to investigate, locate and track children who are referred as "Children Missing from Education";
- to oversee the education needs of vulnerable pupils e.g. Gypsy Traveller families;
- to work in partnership with the Police in the arrangement and coordination of formal truancy operations in accordance with Crime and Disorder legislation.

### 14.6 The Police

The Police take a fundamental role in Truancy Sweep initiatives. Police officers should be made aware of categories of children who may have a justifiable cause to be out and about during school hours, especially home-educated children and excluded pupils. The police should also be made aware of other relevant information such as school hours, school holidays, training days, and whether the area is frequented by children from other areas with different school holidays.

The police should be given names and known movement patterns of children known to be persistent non-attendees and, where appropriate their address.

It is recommended in the 'All Wales Attendance Framework' that the police officers operating the power to approach young people do so in uniform (due to child safeguarding concerns) and where practicable are accompanied by an education representative such as an EWO, who will be able to check the school status of the young person concerned.

Where appropriate the British Transport Police are brought into discussions in respect of problems, involving pupils congregating on the rail network.

During Truancy Sweeps there may be occasional cases in which suspected truants refuse to comply. In such cases, if the police officer has reasonable grounds for believing that the child or young person is absent from school without authority, the power under section 16 and section 8 will enable the officer to use such reasonable force as is necessary in the circumstances. Similarly, once the child is returned to the Designated Central Location or School where the suspected truants refuse to comply, the police officer has reasonable grounds for believing that the child or young person is absent from school without authority, the power under section 117 of the Police and Criminal Evidence Act 1984 enables an officer to use such reasonable force as is necessary in the circumstances.

As part of the local authority's Code of Conduct for tackling non-attendance at school, Police are able to request an FPN be issued to a pupil's family if they are found in a public place during school hours (truanting).

### **15. Attendance initiatives**

The school and local authority will work closely together to raise the awareness of school attendance, promote good attendance and tackle unauthorised absence.

The school will use an awards system to reward pupils who have excellent or improving attendance. Any reward system must be meaningful to the children and the timing of rewards needs to be taken into account to ensure that the children can make the link between their attendance and any rewards.

The school will work with the Education Welfare Service to undertake local authority initiatives such as the Wellbeing Response Visits, Meet and Greet sessions and target groups.

### **16. Categorisation of absence**

All pupils who are on role but not present in the school must be recorded within one of these categories.

- Authorised Absence
- Unauthorised Absence
- Approved Educational Activity

#### *Unauthorised absence*

These codes are for those sessions where pupils were absent and no reason has been provided, or whose absence is deemed to be without valid reason.

#### *Authorised absence*

These codes are for those sessions where pupils are away from school for a reason that is deemed to be valid. Evidence may be requested to support the reason given (e.g. medical evidence, appointment cards, etc.)

### *Approved educational activity*

These codes cover types of supervised educational activity undertaken off the school site but with the approval of the school and/or the LA, where the session has been supervised by an approved tutor.

This would include:

- Work experience placements
- Field trips and educational visits
- Sporting activities
- Link courses or approved education at another venue
- Education arranged by the Child and Adolescent Mental Health Service (CAMHS)

### **17. Dual Registration**

Pupils who attend another school or unit will be dually registered at both venues. The enrolment status within the management information system (MIS) indicates the main place of education and which the subsidiary is. An example would be a pupil registered at this school but attending EOTAS provision or a pupil referral unit for certain days each week. The main school will be whichever the child attends for more than 50% of their time. The other will be the subsidiary.

The school or provision where the child is expected to attend is responsible for accurately recording the pupil's attendance and chasing up non-attendance. School will liaise with the other education provider on a daily basis in order to identify pupils who are absent for the session and mark the register accordingly.

### **18. Retention of records**

Computer registers are preserved as electronic back-up copies. Attendance regulations stipulate that attendance records should be retained for at least three years; however it is good practice to extend this period in line with the education record retention schedule.

### **19. Register checks**

The local authority will formally check the school registers on a termly basis to ensure there is compliance with the national legislation. It should be noted that registers are legal documents, and it is an offence not to maintain accurate records.

### **20. Attendance targets**

A system for analysing performance towards the targets has been established and the head teacher is responsible for overseeing this work. The school and Governing body will make use of the attendance data available from the Consortium and the local authority when reviewing its targets and analysis of the outcomes in comparison with similar schools from across the region.

The head teacher will present the attendance data in each of the termly reports to the Governing body for the figures to be scrutinised against the attainment data. The

Governors will have the opportunity to challenge the data alongside the practices for managing attendance, in order to tackle the overall absence rates across the school and within specific cohorts of learners.

***Our school targets are: 95%***

## **21. Strategic Action Plan**

The school will produce an action plan to show how the school will set about achieving its attendance targets. This will include the school's aims for its vulnerable groups of learners, how it intends to close the gaps between the FSM and non-FSM pupils' attendance, the operational management of attendance, the strategic management of attendance including the evaluation of impact of interventions etc.

This action plan will be reviewed on an annual basis and will be used to inform the School Improvement Plan.

## APPENDIX 1

### The registration system

The following national codes will be used to record attendance information.

CODE	DESCRIPTION	MEANING
/	Present (AM)	Present
\	Present (PM)	Present
<b>B</b>	Educated off site (NOT Dual registration)	Approved Education Activity
<b>C</b>	Other Authorised Circumstances (not covered by another appropriate code/description)	Authorised absence
<b>D</b>	Dual registration (i.e. pupil attending other establishment)	Approved Education Activity
<b>E</b>	Excluded (no alternative provision made)	Authorised absence
<b>F</b>	Extended family holiday (agreed)	Authorised absence
<b>G</b>	Family holiday (NOT agreed <u>or</u> days in excess of agreement)	Unauthorized absence
<b>H</b>	Family holiday (agreed)	Authorised absence
<b>I</b>	Illness (NOT medical or dental etc. appointments)	Authorised absence
<b>J</b>	Interview	Approved Education Activity
<b>L</b>	Late (before registers closed)	Present
<b>M</b>	Medical/Dental appointments	Authorised absence
<b>N</b>	No reason yet provided for absence	Unauthorized absence
<b>O</b>	Unauthorized absence (not covered by any other code/description)	Unauthorized absence
<b>P</b>	Approved sporting activity	Approved Education Activity
<b>R</b>	Religious observance	Authorised absence
<b>S</b>	Study leave	Authorised absence
<b>T</b>	Traveller absence	Authorised absence
<b>U</b>	Late (after registers closed)	Unauthorized absence
<b>V</b>	Educational visit or trip	Approved Education Activity
<b>W</b>	Work experience	Approved Education Activity
<b>X</b>	Un-timetabled sessions for non-compulsory school-age pupils	Not counted in possible attendances
<b>Y</b>	Enforced closure	Not counted in possible attendances
<b>Z</b>	Pupil not yet on roll	Not counted in possible attendances
<b>#</b>	School closed to pupils	Not counted in possible attendances

## **APPENDIX 2**

### **Legislation and guidance**

The Education Act 1996 Part 1, Section 7 states:

The parent of every child of compulsory school age shall cause him to receive efficient full-time education suitable:

- (a) to his age, ability and aptitude and
- (b) to any special needs he may have either by regular attendance at school or otherwise.

For educational purposes the term parent means natural parents and includes any person who has parental responsibility or has day to day care of the child.

Section 444 1, 1(a) and (ZA) contains the details of when an offence is committed if a child fails to attend school or alternative provision arranged by the Local Authority.

The Education (Penalty Notices) (Wales) Regulations 2013 set out the framework for the operation of the Fixed Penalty Notice scheme.

The Equalities Act 2010 (Statutory Duties) (Wales) Regulations 2011

### **Registers and admission.**

- The Education (Pupil Registration) (Wales) Regulations 2010
- The Education (School Day and School Year) (Wales) (Amendment) Regulations 2006

### **Attendance targets**

- The Education (School Performance and Unauthorised Absence Targets) (Wales) (Amendment) Regulations 2006.

### **Guidance documents relating to attendance**

- All Wales Child Safeguarding Procedures
- Keeping Learners safe
- Belonging, engaging and participating – Guidance on improving learner engagement and attendance
- The All Wales Attendance Framework
- The National Assembly for Wales Circular 47/2006 Inclusion and Pupil Support.
- Consortium's Attendance Strategy
- Local Code of Conduct relating to the Fixed Penalty Notice scheme
- Welsh Government Guidance on penalty notices for regular non-attendance at school
- Welsh Government Guidance on attendance codes

## Code Use for Common Courses and Activities

<b><u>EXCEPTIONS</u></b>	<b><u>Code</u></b>	<b><u>SIMS Notes Field Exemplar</u></b>
Music Exams	B	Music Exam. Letter provided & copied
Speech & Language Therapy	B	SALT Letter provided & Copied
Asthma Clinic	M	Asthma Clinic. Appointment card copied
Physiotherapy	M	Physiotherapy Appointment card copied
Sporting Tours	C	Tour (E.g. Rugby) and date. Evidence copied
Football Academy (With classroom learning)	B	E.g. Cardiff Academy with classroom. Letter copied
Football Academy (Without Classroom learning)	C	E.g. Swansea Academy. Letter copied
Club & National Competitions	P	Activity / Competition, Place and Date. Letter copied
Overseas Trips through Competitions	P	Activity / Competition, Place and Date. Letter copied
Travelling Time to Competitions (With letter from the Club)	C	Travelling to (Place Name) for competition . Letter copied
E-learning where there is an agreed package with the L.A	B	E-learning. Evidence Letter copied.
Child Performance	C	Child Performance. Evidence with L.A.

**\* Any evidence provided to support code usage must be retained by school**