

ARGYLL & BUTE COUNCIL

Internal Audit Section

INTERNAL AUDIT REPORT

CUSTOMER DEPARTMENT	COMMUNITY SERVICES
AUDIT DESCRIPTION	RISK BASED AUDIT
AUDIT TITLE	Exclusion and Truancy
AUDIT DATE	December 2015

2015/2016



1. BACKGROUND

This report has been prepared as a result of an Internal Audit review of Exclusion and Truancy procedures within the Education Services as part of the 2015/2016 Internal Audit programme.

Under section 30 of the Education (Scotland) Act 1980, parents of school age children are legislatively required to ensure provision of education for their children either by attendance at a public school or by other means. Schools in turn must maintain an attendance register and record child and young person absence for each morning and afternoon school session. Education authorities are required to record the authorised and unauthorised absence of all school children and young people.

Included, Engaged and Involved provides National Guidance which states that, “making sure pupils are included, engaged and involved in their education is fundamental to achievement and attainment in school”. The Education Service Plan states (ED01 & 02) that, “primary/secondary school children are enabled to increase levels of attainment and achievement and realise their potential” with the success measure “increase in primary/secondary attendance rates” being identified. Argyll & Bute Council has 76 Primary Schools, 10 Secondary Schools and one Special School with a primary school roll of 5,790 and a secondary school roll of 4,659 (census 2015). There are currently 5 Attendance Officers working within Secondary Schools in Argyll & Bute (based in Hermitage, Dunoon, Rothesay, Oban and Campbeltown). The Attendance Officers also provide support to Primary Schools within their area.

The power to exclude rests with local authorities under regulation 4 of the School General (Scotland) Regulations 1975, it is the responsibility of local authorities to devise and implement policies and procedures on exclusion. In addition, section 14(3) of the Education (Scotland) Act 1980 places a duty on education authorities to make alternative education provision when a learner is excluded.

2. AUDIT SCOPE AND OBJECTIVES

A review was undertaken of policies and procedures in respect of arrangements for Exclusion and Truancy, including compliance with policies and procedures. Three secondary schools were visited as part of this Audit.

Control objectives included:

Authority – policies and procedures exist and procedures are operated in accordance with it;

Occurrence - there is appropriate and adequate documentation to support all exclusions and truancy occurrences;

Completeness - exclusions and truancy records are properly administered and all records updated appropriately;

Measurement - procedures ensure information is regularly reviewed for accuracy;

Timeliness – exclusion and truancy records are updated regularly and promptly;

Regularity - all records and documents are protected against loss and unauthorised access.

3. RISKS CONSIDERED

- ED07 Failure to ensure that young children and their families are given assistance to help them achieve the best start in life;
- The council does not maintain appropriate policies and procedures resulting in a failure to provide quality services efficiently and effectively;
- Authorities, roles and responsibilities have not been identified and assigned;
- Failure to comply with legislation;
- Failure to comply with National guidance;
- Failure to adhere to policies and procedures.

4. AUDIT OPINION

The level of assurance given for this report is substantial.

Level of Assurance	Reason for the level of Assurance given
High	Internal Control, Governance and the Management of Risk are at a high standard with only marginal elements of residual risk, which are either being accepted or dealt with.
Substantial	Internal Control, Governance and the Management of Risk have displayed a mixture of little residual risk, but other elements of residual risk that are slightly above an acceptable level and need to be addressed within a reasonable timescale.

Limited	Internal Control, Governance and the Management of Risk are displaying a general trend of unacceptable residual risk and weaknesses must be addressed within a reasonable timescale, with management allocating appropriate resource to the issues.
Very Limited	Internal Control, Governance and the Management of Risk are displaying key weaknesses and extensive residual risk above an acceptable level which must be addressed urgently, with management allocating appropriate resource to the issues.

This framework for internal audit ratings has been developed and agreed with Council management for prioritising internal audit findings according to their relative significance depending on their impact to the process. The individual internal audit findings contained in this report have been discussed and rated with management.

A system of grading audit findings, which have resulted in an action, has been adopted in order that the significance of the findings can be ascertained. Each finding is classified as High, Medium or Low. The definitions of each classification are set out below:-

<p>High - major observations on high level controls and other important internal controls. Significant matters relating to factors critical to the success of the objectives of the system. The weakness may therefore give rise to loss or error;</p> <p>Medium - observations on less important internal controls, improvements to the efficiency and effectiveness of controls which will assist in meeting the objectives of the system and items which could be significant in the future. The weakness is not necessarily great, but the risk of error would be significantly reduced if it were rectified;</p> <p>Low - minor recommendations to improve the efficiency and effectiveness of controls, one-off items subsequently corrected. The weakness does not appear to affect the ability of the system to meet its objectives in any significant way.</p>
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5. FINDINGS

The following findings were generated by the audit:

- 5.1 Appropriate policies and procedures exist and practice reflects available guidance. Education Management Circulars are available to provide guidance on truancy and exclusion. These are aligned to national guidance within Included, Engaged and Involved (The Guidance).

- 5.2 The guidance states that schools can encourage good attendance by raising the profile of attendance and absence. It was found that each school has a School Handbook which includes information that promotes school attendance. It was found that there are processes in place at a local level to ensure that parents are informed about their responsibilities in terms of attendance and are informed of non-attendance using various methods of communication, including text messaging.
- 5.3 The guidance states that it is important that authorities make their locally produced exclusion guidelines available publicly in a form which is easily understandable. It was found that Education Management Circular 3-08 is issued to all schools and “Managing Exclusions in Schools” is available on the Councils’ website. This circular is specifically guidance for Head Teachers on management of exclusion within Education.
- 5.4 There is appropriate and adequate recording of pupil attendance. The guidance states that a system should be in place to enable centralised recording of attendance for each pupil in the school where the pupil is registered. Attendance within secondary schools is recorded on the Click and Go facility on Seemis (School Data Management System). This attendance system can be accessed by all class teachers.
- 5.5 Exclusions and truancy records are properly administered and records are updated regularly and promptly. The guidance states that recording of attendance should take place at least twice a day to enable the school to note attendance and absence for each morning and afternoon session. Within the schools sampled it was found that attendance is monitored on a lesson-by-lesson basis, which is over and above the requirements of the guidance.
- 5.6 It was found that procedures ensure information is regularly reviewed for accuracy. Individual schools have their own protocols in place, for example, in one school visited the Attendance Officer and Principal Teacher Guidance meet regularly to discuss attendance and any concerns with regards to attendance are reviewed by ‘exception’ by the Head Teacher and Deputy Head Teacher. Pupil attendance can be referred to the Joint Support Group which is chaired by the Deputy Head Teacher. This meets on a fortnightly basis. Thresholds for attendance concerns are managed at a local level.
- 5.7 The guidance states that there should be regular reviews of policies and procedures. It was found that guidance issued to schools was dated 2010. Circular 3.03 - School attendance and absence refers to additional information which is contained in document dated 2003. There is currently a review of all Education Management circulars being undertaken, this will include the Exclusion and Truancy Policy.

5.8 All records and documents are protected against loss and unauthorised access. Access to Seemis Click and Go facility to record attendance is password protected. Pupil records are stored in a locked room in locked filing cabinets and only authorised staff can access these files.

Table 1

Exclusions Analysis	School Roll	Exclusions Openings	Exclusions Incidents	No. of Pupils Excluded	% Incidents
Campbeltown Grammar School	429	183	22	13	8.3%
Dunoon Grammar School	784	102	36	28	2.8%
Hermitage Academy	1,329	185	33	25	5.6%
Islay High School	210	25	5	4	5.0%
Lochgilphead High School	489	86	15	10	5.7%
Oban High School	975	48	20	16	2.4%
Rothesay Academy	302	115	28	18	4.1%
Tarbert Academy	110	86	20	10	4.3%
Tiree High School	25	14	3	2	4.7%
Tobermory High School	140	30	9	6	3.3%
Total	4,793	874	191	132	4.6%

Table 1 illustrates exclusion analysis by School 2015. Exclusion openings refer to the number of morning and afternoon sessions that a pupil has been excluded i.e. if a pupil is excluded for one whole day that would show as 2 openings. Exclusion incidents refer to the physical number of incidents that have resulted in exclusion. The number of pupils excluded can be the same pupil excluded for more than one incident. The average number of pupils excluded against the pupil rolls is 2.7%.

Table 2

Cost Centre Name	Possible Openings (School)	Attendance Openings	Attendance (%)
Campbeltown Grammar School	443,312	408,672	92.19%
Dunoon Grammar School	825,584	760,690	92.14%
Hermitage Academy	1,407,125	1,306,581	92.85%
Islay High School	228,388	215,050	94.16%
Lochgilphead High School	515,662	480,770	93.23%
Oban High School	1,036,674	954,177	92.04%
Rothesay Academy	311,139	290,211	93.27%
Tarbert Academy	117,740	108,214	91.91%
Tiree High School	26,774	24,334	90.89%
Tobermory High School	149,084	139,322	93.45%
Total:	5,061,482	4,688,021	92.62%

Table 2 illustrates attendance by secondary school 2015. The Average attendance rate was 92.62% with no material deviation within any individual school.

- 5.9 Attendance, absence and exclusion reports are submitted to Area Committees within the annual school profile report. These reports detail 5 year trends for attendance, absence and exclusion for each secondary school.

6. CONCLUSION

This audit has provided a substantial level of assurance. There were two recommendations for improvement identified as part of the audit and these are set out in Appendix 1 and 2. There is one medium recommendation set out in Appendix 1 which will be reported to the Audit Committee. There is one low recommendation which is not reported to the Audit Committee. Appendices 1 and 2 set out the action management have agreed to take as a result of the recommendations, the persons

responsible for the action and the target date for completion of the action. Progress with implementation of actions will be monitored by Internal Audit and reported to management and the Audit Committee. Thanks are due to the Education staff and management for their co-operation and assistance during the Audit and the preparation of the report and action plan.

APPENDIX 1 ACTION PLAN

Findings	Risk Impact	Rating	Agreed Action	Responsible person agreed implementation date
1. Policies		High/ Medium or Low		
It was found that guidance relating to exclusions and truancy issued to schools has not been reviewed since it's issue in 2010. However, it has been confirmed that the relevant guidance is currently under review.	Failure to regularly review procedures may lead to inefficient and ineffective operations resulting in non-compliance.	Medium	Continue with planned guidance review	Head of Education June 2016



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