

Equality Commission

Northern Ireland

**Response to: Draft 'Attendance Matters'
Department of Education Consultation**

March 2026

Introduction

The Commission welcomes the launch of the new Attendance Strategy, *Attendance Matters* and welcomes the commitment of the Department of Education to improving the falling attendance rates within schools in Northern Ireland. This response outlines the Equality Commission's priority action areas and provides both general and specific recommendations in relation to the equality issues affecting poor attendance. Our response also provides advice on Section 75 and compliance with the Department's statutory duties. Our recommendations for enhancing the strategy are set out below and include some general comments and specific points.

Summary and General Comments

The Commission acknowledges the need to improve attendance in schools in Northern Ireland and has concerns regarding low attendance among certain Section 75 groups.

We welcome the Department's work within this area, and many of the actions and aspirations contained within the draft Strategy. Specifically, we welcome the Departments commitments to

- Supporting the development of nurturing, trauma-informed environments to reduce emotionally based school non-attendance.
- Ensuring behaviour policies should be "child centred and focused on the inclusion of children and young people, with particular reference to the Special Educational Needs and Disability (SEND) (Northern Ireland) Order 2005".
- Strengthening data collection, monitoring, and working in collaboration with a wide range of stakeholders.

While welcoming the publication of the draft for consultation, we highlight a number of areas which should be covered in the final Strategy, such as:

- The inclusion of Measurable targets to ensure accountability and drive positive change.

- The inclusion of specific and detailed actions within the Strategy to improve attendance of certain Section 75 groups.

The final Strategy should be better informed about what the Department considers to be the potential equality impacts of the policy proposals it contains. The Department can address this by carrying out a full equality impact assessment.

In general, across all Section 75 groups we highlight current gaps, for example the lack of appropriate placements for children and young people with special educational needs. While the Minister's Foreword is clear that the strategy is aimed specifically at those with a place in school, we suggest that the Department's understanding of the drivers for non-attendance extends into system-driven reasons for particular Section 75 groups.

Specific Recommendations

Measurable Targets

While we welcome the Department publishing the data they hold on attendance across some Section 75 groups and their commitment to "monitor data to identify at-risk learners and close attendance gaps through targeted policies and funding", we note the absence of measurable targets throughout the draft Strategy.

It is important that all Departmental strategies include measurable targets to focus actions, ensure accountability, and drive positive change. In particular, we emphasise the importance of introducing measurable targets for Section 75 groups, to help address persistent inequalities experienced between these groups.

The systems for monitoring the Strategy and the targets that the Department will develop should be consistent with how it monitors its policies to comply with its Equality Scheme and duties in Section 75.

Funding for Differentiated Needs

We welcome the Department's commitment as mentioned within priority area 3 to "support schools through existing funding streams such as the Common Funding Formula (CFF), Targeting Social Need, Extended Schools Programme, etc". We suggest the Department should consider the ringfencing of 'differentiated funding' within the Common Funding Formula.

The Department should monitor differentiated needs funding within the Common Funding Formula to ensure this funding is used to address educational inequalities across the targeted groups, such as that for newcomer pupils, and the effects of it on attendance. This is a specific action that could be implemented by the Department and should be considered within the drafting of the final Strategy.

Compliance with SENDO 2005

We welcome that the Department, within priority area 2, have advised that "Schools and Boards of Governors should review behaviour policies with input from parents and pupils, ensuring inclusivity and compliance with SENDO 2005."

Within our policy recommendations on advancing equality for children and young people with SEN, we highlighted that the Education and Training Inspectorate (ETI) should monitor the compliance of School Boards with their duty to prepare accessibility plans, including to improve the physical accessibility of the school, and to increase participation in the curriculum¹. We suggest the Department should take this into account in the finalisation of the Strategy.

We also welcome the Department's recognition of the statutory duties of Boards of Governors in relation to disability discrimination under the Special Educational Needs and Disability (Northern Ireland) Order 2005.

¹ Equality Commission for Northern Ireland (2024) [Advancing Equality for Children with Special Educational Needs](#) (Accessed 05/03/2026).

Bullying

We welcome the recognition of the impact of bullying on children and their non-attendance. We welcome the Department's recommendation that Boards of Governors should "ensure that the school has legislatively required appropriate procedures for dealing with the issue of bullying type behaviour and complaints about bullying".

We have previously highlighted the importance of monitoring compliance with the Addressing Bullying in Schools Act (2016)² and encourage the Department to provide further detail in its final Strategy on how actions to ensure compliance with the Act will be monitored and reported on.

We additionally highlight the need for staff training in order to combat prejudice-based bullying that will affect a child's attendance. Incidents such as these may be unintentional or go unnoticed within or around a school, we recommend assisting staff to better understand their responsibility to prevent, record and respond to prejudice-based bullying.

Children and Young people with Special Educational Needs (SEN):

As the Department's data shows, children with a statement of Special Educational Needs (SEN) recorded an absence rate of 12.7% in 2023/24, compared with the Northern Ireland average of 8.3%³.

We welcome the commitment listed within priority two which states that schools must minimise the use of reduced timetables. However, we are concerned about the lack of detail in the draft Strategy regarding how the Department will either regulate or monitor any continued use.

The Commission highlights that in relation to lower attendance of some children and young people with SEN, a significant factor is likely to be school avoidance/school anxiety if the placement is inappropriate for the pupil. We note the importance of an appropriate placement, in order to

² Department of Education (2021) Addressing Bullying in Schools Act (NI) 2016 (the Act). Available at <https://www.education-ni.gov.uk/publications/addressing-bullying-schools-act-ni-2016-act> (Accessed 06/03/2026).

³ Department of Education (2025) Attendance Matters Draft Strategy. Available at: <https://www.education-ni.gov.uk/consultations/consultation-pupil-attendance-strategy-attendance-matters> (Accessed 06/03/2026).

avoid school non-attendance and emphasise the need for education services that are designed and resourced in a way that enables full participation, particularly for children from Section 75 equality groups who do not enjoy equality of opportunity in access to education and school. We recommend the final Strategy should include actions to ensure SEN children will be allocated appropriate placements.

The Department should use its equality assessment processes to analyse patterns of non-attendance across the equality groups. This will enable the Department to reflect on whether the educational environment, support structures and teaching approaches are adequately meeting pupils' needs.

Teacher Training and Professional Development

Whilst we welcome the commitment listed in priority one to deliver professional learning to support schools to understand emotional based school nonattendance, we consider it appropriate to highlight that professional learning should also be delivered to equip teachers to appropriately support all young people with SEN. We note the Department is aware of instances⁴ in relation to pupils with special educational needs being suspended or expelled in cases where their behavioural presentation is an outworking of a SEN and/or learning disability⁵.

While acknowledging recent funding allocated by the Department to support teacher training and professional development, we understand that continuous professional development is largely voluntary - teachers are not required to participate beyond core school training days - and they have limited time or capacity for this. This creates a risk, as there is no requirement for teachers to undertake updated training on new methods or approaches to education. Teachers should be supported and

⁴ Department of Education (2025) Attendance Matters: Draft Strategy <https://www.education-ni.gov.uk/sites/default/files/2025-12/ATTENDANCE%20MATTERS-CONSULTATION.pdf> (Accessed 06/03/2026).

⁵ Department of Education (2025) Attendance Matters Draft Strategy <https://www.education-ni.gov.uk/sites/default/files/2025-12/ATTENDANCE%20MATTERS-CONSULTATION.pdf> (Accessed 06/03/2026).

given ringfenced time to access opportunities for continuous professional development.

The Department should also consider and explore options for inclusion in the final Strategy, such as teachers being required to undertake a defined number of hours each year to maintain accreditation, given best practice in other jurisdictions⁶.

Supporting attendance for Newcomer, Traveller and Roma Children.

From the Department's data, among all pupil groups it remains the case that Irish Travellers display the highest level of absence (31.2%). This is considerably higher than the Northern Ireland average (8.3%)⁷.

We recommend that the final Strategy specifically addresses the needs of Newcomer, Traveller and Roma children that affect their attendance.

We recommend that the Department engage with the Traveller Education Stakeholder Engagement Group and the Roma Thematic Group (facilitated by TEO) to draw on their expertise and better understand the particular needs of these groups and how this funding can be used more effectively to improve outcomes for Traveller and Roma pupils⁸.

We suggest the Department engage directly with Traveller pupils and their families to ensure appropriate read across from this Strategy to any updated Traveller Education Strategy. We further recommend ensuring the Traveller Education Strategy receives sufficient resourcing to improve Traveller pupils' educational experiences and school attendance.

We also recommend that the Department ring fence funding needed to effectively deliver the Toybox Project to ensure Traveller and Roma

⁶ Equality Commission NI (2025) ECNI Response to the DfE's Call for Evidence as part of the Curriculum Review for Northern Ireland. Available at: [ECNI Response to the DfE's Call for Evidence as part of the Curriculum Review for Northern Ireland](#) (Accessed 06/03/2026).

⁷ Department of Education (2025) 'Attendance Matters' Draft Strategy Available at: [Consultation on a pupil attendance strategy - Attendance Matters | Department of Education](#). (Accessed 06/03/2026).

⁸ Equality Commission NI The Equality Commission's education policy priorities and recommendations for Northern Ireland Available at : Equality in Education: Full Position Paper, Page 57. (Accessed 06/03/2026)

children are supported to build and maintain a positive relationship with school attendance. We highlighted concerns within our recent response to the Executive’s consultation on the Early Learning and Childcare Strategy regarding the suggestion to expand the Toybox Project to also provide support to Newcomer children⁹. While we acknowledge the importance of consistent and protected funding for Newcomer children, we remain concerned that the proposed expansion of the Toybox Project has not yet been fully costed. Consideration should be given to how the Toybox Project will meet the needs of all children. The Department should ensure that, if the Project is expanded, it is funded appropriately so that the specific needs of Traveller and Roma children continue to be met. The Commission considers it essential that the long-standing needs of Traveller and Roma children do not now become invisible.

We note this draft Strategy does not make reference to Newcomer children who are not in school due to being unable to secure a place. Nor is there any specific acknowledgement of those children who do not attend due to the practicalities and barriers created due to temporary housing arrangements¹⁰. We suggest the final Strategy should include support measures for these children and young people; and considers further measures to aid the Department’s “understanding why children are missing from formal education”.

Data for girls and non-attendance

We note the concerning trend highlighted in the Attendance at Grant-Aided Primary, Post-Primary and Special Schools in Northern Ireland, 2024/25 publication, which displayed that in post-primary schools, female students (10.2%) had a higher overall absence rate than male students (9.5%)¹¹. Unauthorised absence has also risen faster for

⁹ Department of Education (2025) Early Learning and Childcare Strategy <https://www.education-ni.gov.uk/sites/default/files/2025-12/FINAL%20VERSION%20draft%20ELC%20Strategy%2023.12.2025.PDF> (Accessed 06/03/2026).

¹⁰ ECNI correspondence TEO Move On Group 240503- Case Study One (Available upon request).

¹¹ Department of Education & Northern Ireland Statistics and Research Agency (2026) Attendance at grant-aided primary, post-primary and special schools in Northern Ireland, 2024/25. Available at [Attendance at grant-aided primary, post-primary and special schools in Northern Ireland, 2024/25](#) Section 2.1. (Accessed 06/03/2026).

girls than boys with an increase of approximately 1.9 percentage points versus 1.4 percentage points since 2018/19¹².

Within the Draft Strategy this trend is not acknowledged, nor is it in the equality screening document. We recommend that the Department engage with pupils, school leaders and parents to better understand the current and specific reasons why girls are increasingly less likely to attend school and ensure that the final Strategy identifies and addresses their needs.

Advice on the Equality Assessment

We note the Department has decided against carrying out a full equality impact assessment for the policies proposed in the draft Strategy. As noted above, what the Strategy proposes for its policy goals, and the needs/experiences and data on attendance it has missed, will likely have a major impact on equality of opportunity for some of the Section 75 equality categories.

For example, children and young people with a disability, from different racial groups – particularly Irish Travellers - and for girls and young women. The evidence above illustrates the risks identified by the data and where there may be needs. We are concerned about the Department's screening decision, and we recommend that the Department reconsider its decision.

There is significant complexity in the issues considered in the draft Strategy. There is a direct link between school attendance and educational achievement and lifetime opportunities. There are societal inequalities identified in the Department's screening assessment. We recommend that the Department set these out more clearly using the full EQIA process, so that those responding to the Strategy can also consider and engage with the Department's equality assessment of what is proposed.

¹² El Cavador (2026) Gone Girls: A Gender Reversal the Department of Education Hasn't Noticed.... Slugger O'Toole. Available at: [Gone Girls: A Gender Reversal the Department of Education Hasn't Noticed... – Slugger O'Toole](#). (Accessed 06/03/2026).

We note that while the Department has committed to using the Commission's recommended screening template when assessing policies, the section on 'needs, experiences and priorities' has been removed from the screening document. The Department should ensure that this is included in all screening assessments and in this assessment.

While there is some relevant quantitative data in this section of the screening form, there is a lack of qualitative data and no data in relation to some of the Section 75 categories e.g. disabled pupils / SEN pupils in mainstream schools.

In the 'people with and without dependants' section, while there is some data in relation to 'children looked after' there is no data/evidence in relation to pupils with caring responsibilities e.g. for a disabled parent, younger siblings etc.

The screening concludes that the strategy will have a 'minor' impact on all Section 75 categories. As noted above, the evidence presented suggests 'major' potential impacts for some Section 75 categories in relation to attendance, which should lead to the Department undertaking an EQIA.

While we note that the screening decision is supported by some mitigation measures, these appear to be other interventions and sources of support. As the assessment of potential impacts itself misses key data, such as the increasing rates of non-attendance by girls, this section and the consideration of alternative policies should be re-visited.

The arrangements set out in the S75 monitoring section of the screening appear to be for generic monitoring of the overall impact of the strategy, not for equality of opportunity. The Department should set out in this section of its screening -or EQIA - specific Section 75 monitoring arrangements that will be put in place to assess the actual impact of the policies in the strategy, once implemented, on the Section 75 groups. This will enable the Department to determine if the strategy is helping to close the gaps in attendance between the different groups or if alternative / additional interventions are required.

The screening assessment also notes that current Section 75 data collection is insufficient e.g. gaps in data for SEN/disabled pupils in mainstream schools, no data in relation children with caring responsibilities etc. The Department should therefore set out the measures that will be put in place to address the identified gaps in data, and we recommend the Department does this alongside developing its measures for the Strategy as a whole.

Equality Commission for Northern Ireland

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