

# Attendance, Engagement, Re-engagement and Withdrawal Policy

Accurate attendance records, early support and fair withdrawal decisions for intensive adult Skills Bootcamp delivery

| Policy field                                                                                                                                                                                                                                                                                                                                                                                                                                            | Current position                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provider                                                                                                                                                                                                                                                                                                                                                                                                                                                | Quack Recruitment & Training Ltd                                                                                                                                                                                                   |
| Applies to                                                                                                                                                                                                                                                                                                                                                                                                                                              | All learners, tutors, assessors, learner-engagement staff, progressions staff, MIS/ILR staff, quality staff, managers and delivery partners involved in attendance, engagement, support, programme status or withdrawal decisions. |
| Learner context                                                                                                                                                                                                                                                                                                                                                                                                                                         | Primarily adult Skills Bootcamp and funded learners aged 19+, including short intensive face-to-face, remote, blended and employer-linked provision.                                                                               |
| Policy owner                                                                                                                                                                                                                                                                                                                                                                                                                                            | Jessica Roughton - Quality & Compliance Lead / SEND Lead                                                                                                                                                                           |
| Operational leads                                                                                                                                                                                                                                                                                                                                                                                                                                       | Lead Tutor and learner-engagement team for daily attendance/re-engagement; tutors for registers and learning recovery; MIS/ILR staff for programme status; Progressions for employment-related barriers and follow-up.             |
| Senior accountable lead                                                                                                                                                                                                                                                                                                                                                                                                                                 | Dion Bishop - Managing Director / Director of Contracts & Operations                                                                                                                                                               |
| Approved records                                                                                                                                                                                                                                                                                                                                                                                                                                        | Signed or approved electronic registers, PICS, ILP/reviews, learner contact logs, support records, re-engagement plans, Teams evidence where applicable, withdrawal records, qualification status and ILR/audit evidence.          |
| Review date                                                                                                                                                                                                                                                                                                                                                                                                                                             | August 2027 or sooner following material change to Skills Bootcamp funding rules, commissioner contracts, ILR requirements, inspection expectations or Quack's delivery model.                                                     |
| <b>Policy intent</b><br>Quack expects learners to attend and participate fully because Skills Bootcamps are short and intensive. Attendance concerns will be identified quickly, barriers explored and proportionate re-engagement support provided. Records must reflect what actually happened. Quack will not manufacture attendance, extend learning artificially, delay a genuine withdrawal or use a break in learning merely to protect funding. |                                                                                                                                                                                                                                    |

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## 1. Purpose and Policy Intent

This policy sets the minimum standards for attendance, punctuality, participation, absence response, re-engagement, catch-up learning, breaks in learning and withdrawal across Quack Recruitment & Training Ltd. It is designed for short, employment-focused adult provision where a small amount of missed learning can materially affect progress, assessment readiness and the learner's ability to benefit from the programme.

The purpose is not to create a punitive attendance regime. Quack will combine clear expectations with early support, accurate records and fair decisions. Staff must distinguish between absence, low engagement, an agreed interruption, and a genuine permanent withdrawal. The learner's circumstances and the integrity of funding and achievement records must both be considered.

No learner will be recorded as attending, completing or remaining in learning solely because this produces a more favourable funding position. Equally, a learner will not be withdrawn automatically because of one absence or a single percentage threshold where meaningful re-engagement remains realistic.

## 2. Scope and Delivery Context

| Area                           | Application                                                                                                                                                                                                 |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scheduled learning             | Classroom, practical, assessment, workshop, employer-linked, remote and other planned supervised learning that forms part of the programme.                                                                 |
| Short intensive courses        | A single missed day can represent a significant proportion of a three- or four-week programme. Same-day response and rapid catch-up planning are therefore required.                                        |
| Adult circumstances            | Work, caring, health, transport, housing, financial pressures, disability, SEND and other barriers may affect attendance and must be considered without lowering required learning or assessment standards. |
| Remote and blended delivery    | Attendance must evidence actual participation in planned learning, not merely a platform login or a message sent to the tutor.                                                                              |
| Qualifications and assessments | Attendance concerns may affect assessment readiness, but qualification decisions remain governed by awarding-organisation requirements and Quack's assessment/IQA controls.                                 |
| Funding and ILR                | Programme status, actual end dates, completion and breaks in learning must be recorded according to the current contract, technical funding guide and ILR rules.                                            |
| Higher requirement             | Where a commissioner, awarding organisation, venue, employer or law imposes a higher requirement, the higher requirement applies.                                                                           |

### No universal percentage rule

Quack does not treat one attendance percentage as a universal funding rule or automatic withdrawal threshold. Learners are expected to attend all scheduled learning, but funding eligibility, qualifying periods, completion and withdrawal rules vary by contract. Internal attendance triggers are management controls for early support, not substitutes for the applicable contract.

## 3. Funding, Data, Equality and Inspection Context

| Framework / requirement                            | Application to Quack                                                                                                                                                                                                                                                  |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Current Skills Bootcamp technical funding guidance | Funded starts, completion, withdrawal, breaks in learning and qualifying periods can affect earnings. Current national guidance uses ILR completion-status and actual-end-date fields, but exact qualifying periods and payment arrangements depend on contract type. |
| Devolved-authority / commissioner contracts        | Quack delivers under local and devolved arrangements. Staff must use the contract-specific attendance, evidence, completion, withdrawal and milestone rules rather than assume a national example applies unchanged.                                                  |
| ILR specification and data quality                 | Programme and learning status must be accurate, timely and supported by source evidence. Retrospective changes require a clear audit trail and authorisation.                                                                                                         |
| Equality Act 2010                                  | Attendance processes must not discriminate. Reasonable adjustments may change how a learner accesses learning, but do not remove the need to achieve required outcomes.                                                                                               |
| UK GDPR / Data Protection Act 2018                 | Attendance, health, disability, support and contact information must be processed lawfully and shared only where necessary.                                                                                                                                           |
| Safeguarding and Prevent                           | Non-attendance or sudden disengagement may indicate abuse, exploitation, homelessness, mental-health risk or other safeguarding concerns. Welfare risk takes priority over routine attendance enforcement.                                                            |
| Ofsted FE and skills inspection materials          | Inspectors consider learners' typical experience, participation, support, progress and the effectiveness of leaders' actions. Quack must be able to explain attendance patterns, barriers, interventions and impact rather than simply present a percentage.          |
| Awarding-organisation requirements                 | Missed assessment, identity, invigilation, reasonable adjustment and completion rules must be managed under the relevant qualification requirements.                                                                                                                  |

## 4. Definitions

| Term                                      | Meaning                                                                                                                                                                                      |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Attendance</b>                         | The learner was present for and participated in the planned learning activity for the recorded period.                                                                                       |
| <b>Authorised absence</b>                 | An absence accepted by Quack for management purposes because a reasonable explanation was provided. It remains an absence and is not recorded as learning delivered.                         |
| <b>Unauthorised / unexplained absence</b> | The learner did not attend and Quack has not received or accepted an adequate explanation at the time the register is completed.                                                             |
| <b>Engagement</b>                         | Meaningful participation in learning, assessment, reviews, support and agreed actions. Physical presence alone does not necessarily evidence engagement.                                     |
| <b>Re-engagement</b>                      | Planned action to understand barriers, restore participation and enable the learner to continue successfully where this remains realistic.                                                   |
| <b>Catch-up learning</b>                  | Actual replacement or additional learning delivered to address missed curriculum content. It must be planned, delivered and evidenced rather than assumed.                                   |
| <b>Break in learning</b>                  | A genuine temporary interruption formally recorded only where permitted by the applicable funding/ILR rules and where there is a realistic intention and plan to return.                     |
| <b>Withdrawal</b>                         | A permanent end to the learner's programme before planned completion, whether requested by the learner or administratively determined after evidence and reasonable contact attempts.        |
| <b>Actual end date</b>                    | The date recorded in the ILR or other funding record in accordance with the applicable technical rules, supported by the learner's real learning history and withdrawal/completion evidence. |
| <b>At-risk learner</b>                    | A learner whose attendance, engagement, barriers or contact pattern creates a credible risk of non-completion or poor progression and therefore requires enhanced support/review.            |

## 5. Core Principles

- Learners are expected to attend all scheduled learning, arrive on time, remain for the planned session and participate actively.
- Registers record actual participation. Staff must never sign for a learner who was absent or convert absence into attendance because work was completed later.
- Any unexplained absence triggers same-day contact wherever practicable because short courses leave little time to recover missed learning.
- Attendance concerns must lead to curiosity about the cause, not assumptions about motivation.
- Reasonable support, adjustments and catch-up opportunities should be used where they can realistically protect the learner's progress and programme integrity.
- No one internal threshold automatically proves completion, withdrawal or funding eligibility. Contract and qualification rules remain decisive.
- Learner status must be updated promptly once the evidence supports a decision; Quack must not keep a learner artificially "live".
- Attendance, learning activity, PICS, ILP/review, qualification and ILR records should triangulate. Material contradictions must be resolved.
- Safeguarding risk, disability-related barriers and other vulnerability factors must be escalated appropriately and handled sensitively.
- Quality monitoring focuses on both the rate of attendance/withdrawal and whether interventions were timely, individual and effective.

## 6. Expectations Before and At Programme Start

| Control                         | Minimum standard                                                                                                                                                   |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Pre-enrolment IAG</b>        | Explain dates, daily times, delivery mode, practical requirements, assessment expectations and the importance of full attendance before enrolment.                 |
| <b>Availability check</b>       | Confirm the learner can realistically attend the planned timetable and discuss known work, caring, travel, medical, digital or other constraints.                  |
| <b>Support needs</b>            | Identify reasonable-adjustment or support requirements early and transfer relevant information through approved handover arrangements.                             |
| <b>Induction</b>                | Reconfirm how to report absence, who to contact, punctuality expectations, remote-learning rules, catch-up limitations and consequences of extended disengagement. |
| <b>Contact details</b>          | Check the learner's telephone/email and emergency/welfare contact arrangements where collected and lawful.                                                         |
| <b>First-session attendance</b> | Non-attendance on day one is followed up immediately. Staff must establish whether the learner has genuinely started before any funded-start decision is made.     |
| <b>Register setup</b>           | Registers must match the actual approved timetable and cohort. Pre-populated attendance marks are prohibited.                                                      |

## 7. Attendance Recording Standards

| Requirement                                                                                                                                                                                                                                                                                                              | Control                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contemporaneous recording                                                                                                                                                                                                                                                                                                | The tutor/invigilator records attendance at the session or as soon as reasonably practicable that day, not in bulk at the end of the week.                                  |
| Actual times                                                                                                                                                                                                                                                                                                             | Late arrival and early leaving are recorded where material. Full attendance must not be claimed for substantial missed time.                                                |
| Identity                                                                                                                                                                                                                                                                                                                 | Staff must know who is present. Remote and assessment sessions use appropriate identity controls where required.                                                            |
| No proxy signing                                                                                                                                                                                                                                                                                                         | Learners or colleagues must not sign/register attendance for another person.                                                                                                |
| No blank signing                                                                                                                                                                                                                                                                                                         | Learners must not be asked to sign blank registers or sign in advance for future sessions.                                                                                  |
| Corrections                                                                                                                                                                                                                                                                                                              | Any correction must preserve the original audit trail, explain the reason, identify who changed it and be supported by evidence.                                            |
| Delivery hours                                                                                                                                                                                                                                                                                                           | Only learning actually delivered and attended/participated in can be evidenced as delivered hours for that learner. Missed hours are not automatically converted into GLH.  |
| Storage                                                                                                                                                                                                                                                                                                                  | Final registers are retained in the approved secure evidence location and linked to the cohort/learner record as required.                                                  |
| Quality check                                                                                                                                                                                                                                                                                                            | Registers are checked routinely for missing marks, impossible times, duplicate signatures, repeated patterns, unexplained corrections and inconsistency with other records. |
| <b>Funding integrity</b><br>A register is source evidence. Deliberately recording an absent learner as present, altering hours to create a qualifying period, or backfilling attendance without evidence may constitute malpractice, maladministration or fraud and must be escalated under the relevant Quack policies. |                                                                                                                                                                             |

## 8. Punctuality and Early Leaving

| Situation                           | Response                                                                                                                                                          |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Occasional minor lateness           | Tutor records where material, checks welfare/practical cause and reminds learner of expectations.                                                                 |
| Repeated lateness                   | Discuss pattern with learner, identify barriers and record an agreed action. Consider transport, caring, disability or timetable issues before formal escalation. |
| Substantial late arrival            | Record the actual participation period; missed learning is considered in catch-up and progress review.                                                            |
| Early departure                     | Record actual leaving time where material and the reason. Do not mark the learner present for the full session if a significant element was missed.               |
| Planned unavoidable partial absence | Agree in advance where possible, identify missed curriculum/assessment and determine whether recovery is feasible.                                                |
| Pattern affecting progress          | Escalate to Lead Tutor/Quality as an engagement risk and agree a documented re-engagement/catch-up plan.                                                          |

## 9. Absence Notification and Same-Day Response

Learners should notify Quack as early as possible when they cannot attend. The reason should be recorded proportionately; staff should not collect unnecessary medical or personal detail. Where no notification has been received, Quack should make same-day contact wherever practicable.

| Trigger                                                     | Required action                                                                                                                   | Record                                                                      |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Learner reports absence before session                      | Acknowledge, record reason category, advise on immediate missed learning/next contact and identify safeguarding or support needs. | Register + contact/support note as needed.                                  |
| Unexplained absence at register check                       | Tutor/learner-engagement staff make contact the same day using an appropriate channel.                                            | Register + attempted-contact note.                                          |
| No response by next working day                             | Repeat contact using at least one additional appropriate channel and review known risks/support needs.                            | Contact log and risk/support note.                                          |
| Second consecutive scheduled day missed or material pattern | Escalate to Lead Tutor/Quality for formal re-engagement review and catch-up feasibility.                                          | At-risk/re-engagement plan.                                                 |
| Immediate welfare concern                                   | Use safeguarding/DSL route without waiting for ordinary attendance escalation.                                                    | Safeguarding record; attendance record contains only necessary information. |
| Learner states they are leaving                             | Confirm reason and last participation, offer proportionate support/alternatives, then begin withdrawal process promptly.          | Withdrawal evidence and MIS/ILR action.                                     |

## 10. Engagement Monitoring and Internal Risk Triggers

Attendance is important but does not provide a complete picture of engagement. Tutors should consider participation, work completion, assessment readiness, responsiveness to feedback, review activity and whether the learner is benefiting from the programme.

| Internal trigger                                      | Management response                                                                                                             | Important caveat                                                                               |
|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Any unexplained absence                               | Same-day contact and barrier check.                                                                                             | Not an automatic withdrawal trigger.                                                           |
| About one full day or 10% of planned learning missed  | Amber review: check progress, support and catch-up feasibility; agree actions.                                                  | Internal early-warning point only; not a funding rule.                                         |
| About two full days or 20% of planned learning missed | Red/high-risk review by Lead Tutor/Quality: determine whether remaining learning and assessment can still be completed validly. | No automatic decision; consider programme length, content missed and individual circumstances. |
| Repeated lateness/early leaving                       | Treat accumulated missed learning as an engagement risk and address underlying cause.                                           | Do not convert partial attendance to full attendance.                                          |
| Present but not participating                         | Tutor uses teaching/support intervention and records significant concerns in review/ILP.                                        | Physical presence does not prove learning.                                                     |
| No contact for two consecutive scheduled days         | Escalated re-engagement and welfare review.                                                                                     | Safeguarding considerations may alter the route.                                               |
| Assessment/qualification at risk                      | IQA/assessment controls considered alongside attendance recovery.                                                               | Assessment standards cannot be lowered to offset missed learning.                              |

#### Why these triggers exist

These percentages are Quack management prompts for short-course risk identification. They do not create a contractual entitlement to funding, a minimum attendance rule for completion or an automatic withdrawal point. The decisive question is whether the learner can still receive the required learning, meet assessment/qualification requirements and satisfy the applicable funding contract honestly.

## 11. Re-engagement and Support

| Step                | Expected practice                                                                                                                                                         |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Understand          | Ask what has changed and whether the barrier is temporary, recurring or likely to prevent continuation.                                                                   |
| Check welfare       | Consider safeguarding, mental health, housing, domestic abuse, exploitation, financial hardship and other risks without turning an attendance call into an investigation. |
| Check support       | Review SEND, reasonable adjustments, English/maths/digital needs, transport, caring and accessibility issues.                                                             |
| Review learning gap | Tutor identifies the actual curriculum, practical, assessment or review activity missed.                                                                                  |
| Agree plan          | Set specific learner and Quack actions, catch-up method, dates and review point. Avoid vague "improve attendance" actions only.                                           |
| Confirm feasibility | The Lead Tutor determines whether missed learning can be recovered within curriculum, qualification and contract constraints.                                             |
| Progression impact  | Where employment/interview activity or work changes are contributing, involve Progressions appropriately.                                                                 |
| Review impact       | Check whether attendance and learning improved. If not, escalate rather than repeatedly resetting the same action.                                                        |
| Document            | Record material interventions contemporaneously and keep sensitive information in the correct restricted record.                                                          |

## 12. Reasonable Adjustments, Health and Legitimate Absence

An authorised absence is not the same as attendance. Quack may accept a reason and provide support, but the learner must still receive sufficient learning and meet the relevant assessment and completion requirements. Reasonable adjustments should remove avoidable barriers without creating false attendance or changing competence standards.

| Circumstance                                | Possible proportionate response                                                                                                                 |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Disability / long-term condition            | Adjusted delivery method, rest breaks, accessible materials, remote access where suitable, alternative timing or support plan.                  |
| Short-term illness                          | Brief absence with targeted catch-up where feasible; consider medical evidence only where genuinely necessary and proportionate.                |
| Caring emergency                            | Temporary flexibility/catch-up where feasible and lawful; review recurring impact on programme viability.                                       |
| Bereavement / crisis                        | Compassionate support, temporary absence and catch-up/restart options depending on timing and contract.                                         |
| Religious observance                        | Plan known dates in advance where possible and avoid discriminatory treatment; recover missed learning appropriately.                           |
| Employment interview / progression activity | May support Bootcamp purpose, but attendance status and missed learning must still be recorded accurately; plan around delivery where possible. |
| Work shift change                           | Review whether the learner can continue under the actual timetable or whether another cohort/route is permitted.                                |
| Transport / venue issue                     | Explore reasonable alternative travel, remote participation where educationally suitable, or other practical support.                           |
| Persistent barrier                          | Quality/Lead Tutor review of whether continuation remains in learner's interests and can meet standards.                                        |

## 13. Catch-up and Recovery of Missed Learning

| Control              | Standard                                                                                                                                                                      |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Specificity          | Identify exactly what was missed: knowledge, practical activity, assessment preparation, review, exam or employer activity.                                                   |
| Actual delivery      | Catch-up hours count only where real learning is delivered and evidenced. Sending slides or a workbook alone is not automatically equivalent to taught hours.                 |
| Tutor decision       | Tutor confirms the method is educationally appropriate and sufficient for the missed content.                                                                                 |
| Practical competence | Practical activity must be recovered in a way that genuinely allows practice/assessment; theory substitution is not acceptable where practical competence is required.        |
| Assessment validity  | Do not use assessment as a substitute for teaching that the learner should have received.                                                                                     |
| Timing               | Catch-up occurs promptly enough to support later learning and assessment, not retrospectively after completion simply to fill a record gap.                                   |
| Evidence             | Record date, duration, content, method, tutor and learner participation. Update ILP/review where the learning gap materially affected progress.                               |
| Limits               | Where recovery is no longer realistic, staff must consider transfer/restart/break/withdrawal options permitted by the contract instead of pretending the gap has been closed. |

## 14. Remote and Blended Attendance

| Control                      | Requirement                                                                                                                                            |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identity and presence        | Tutor confirms the learner is the person participating, using appropriate roll call/interaction and platform controls.                                 |
| Login evidence               | Teams/platform logs may support the evidence trail but do not alone prove meaningful attendance for the whole session.                                 |
| Participation                | Use questioning, activities, submissions, discussion, practical demonstration or other appropriate interaction to establish engagement.                |
| Camera use                   | Quack should not treat camera-on as the sole attendance test where accessibility, bandwidth, privacy or reasonable-adjustment considerations apply.    |
| Technical failure            | Record the failure and what learning was actually received. Arrange recovery where material.                                                           |
| Asynchronous activity        | Only treat as planned learning where the approved delivery model/contract permits it and participation/output can be evidenced.                        |
| Late join / early disconnect | Record material missed time and follow the same catch-up principles as face-to-face learning.                                                          |
| Recording sessions           | Only record meetings where there is a lawful, approved purpose and appropriate privacy controls; session recordings do not replace attendance records. |

## 15. Safeguarding and Welfare Escalation

Attendance concerns can be an early indicator of risk. Staff must not assume that a learner who stops attending is simply disengaged. Where the information suggests abuse, coercive control, exploitation, homelessness, serious mental-health risk, self-neglect, modern slavery, radicalisation or another safeguarding concern, the Safeguarding Policy and DSL route applies.

| Indicator                                              | Response                                                                                                                  |
|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Sudden unexplained disappearance after good attendance | Attempt safe contact and consider whether DSL advice is needed based on known context.                                    |
| Learner says someone is preventing attendance          | Treat as a potential safeguarding/exploitation concern; do not confront the alleged person.                               |
| Domestic abuse / coercive control disclosure           | Follow safeguarding process and respect safe-contact instructions.                                                        |
| Homelessness / acute financial crisis                  | Safeguarding/support review and appropriate referral/signposting; consider reasonable delivery adjustment where possible. |
| Mental-health concern affecting safety                 | Escalate according to safeguarding thresholds and seek urgent support where necessary.                                    |
| No safeguarding indicators                             | Continue ordinary re-engagement process without labelling the learner as a safeguarding case.                             |

## 16. Breaks in Learning and Cohort Transfers

Because Skills Bootcamps are short and intensive, breaks in learning should be exceptional rather than a routine way to manage absence. A break or transfer may only be used where the applicable contract/ILR rules allow it, there is a genuine temporary reason, and there is a credible plan for the learner to return and complete.

| Decision test                  | Requirement                                                                                                              |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| Genuine temporary interruption | Evidence indicates the learner intends to return; the break is not being used simply because attendance has become poor. |
| Contract permits               | MIS/Compliance confirms the relevant funding/ILR treatment before the status is changed.                                 |
| Return plan                    | Expected return date/cohort, outstanding learning, qualification implications and support arrangements are recorded.     |

| Decision test              | Requirement                                                                                                                                                  |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Qualifying period          | Where a qualifying period applies, staff recognise that a break may affect whether the learner qualifies for funding and follow the current technical rules. |
| Transfer to another cohort | Only where contract, qualification and delivery capacity permit; the full audit trail links the learner's original and revised learning activity.            |
| No artificial extension    | Do not extend planned/actual dates simply to make a learner appear to remain in learning.                                                                    |
| Review                     | If return becomes unrealistic, convert promptly to the correct withdrawal status rather than leave the learner indefinitely on a break.                      |

## 17. Withdrawal Process

Withdrawal is a significant learner and funding decision. It must be based on evidence, be timely and protect the accuracy of qualification and ILR records. Quack should make reasonable attempts to re-engage a learner who has not explicitly withdrawn, but must not indefinitely keep a non-participating learner active.

| Stage                             | Required action                                                                                                                                                                                                                    |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Explicit learner withdrawal       | Confirm the decision, reason where the learner is willing to provide it, last actual participation, support/signposting offered and whether any qualification components were achieved.                                            |
| Non-contact / presumed withdrawal | Normally make at least three documented contact attempts across at least two working days using more than one appropriate channel before administrative withdrawal, unless evidence/contract timing requires a different approach. |
| Welfare check                     | Review safeguarding/support information before closing the case; use safe-contact restrictions where relevant.                                                                                                                     |
| Tutor review                      | Confirm learning completed, assessment/portfolio status, outstanding work and whether any certification is validly due.                                                                                                            |
| Quality/Compliance review         | Confirm that the proposed withdrawal is supported by records and that catch-up/break/transfer options were considered where appropriate.                                                                                           |
| MIS/ILR update                    | Record the correct status, actual end date and withdrawal/break fields according to current ILR and contract rules without delay.                                                                                                  |
| Funding impact                    | Identify any claim/recovery implications and correct previous submissions where required.                                                                                                                                          |
| Learner communication             | Where contactable, confirm status, achievements/certificates due, future support/signposting and any route to reapply.                                                                                                             |
| Record closure                    | Ensure register, PICS, ILP/reviews, assessment, qualification, progression and ILR records are consistent or discrepancies are explained.                                                                                          |

### Administrative withdrawal safeguard

A learner must not be administratively withdrawn merely because reaching them is inconvenient. Equally, repeated unanswered contact must not be used as a reason to retain a learner indefinitely. The decision should show reasonable re-engagement efforts, a clear evidence-based status decision and prompt data correction.

## 18. ILR, Funding and Evidence Integrity

| Risk                                | Required control                                                                                                                               |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Qualifying-period manipulation      | Do not alter start/end dates, attendance or break status to create a funded start. Use the actual learning history and current contract rules. |
| Delayed withdrawal                  | Once evidence confirms a permanent withdrawal, update the status promptly; do not wait for a convenient claim month.                           |
| False completion                    | Completion requires the applicable programme/subject-learning conditions. Attendance alone does not prove completion.                          |
| Backdated register change           | Requires evidence, reason and authorisation; the original audit trail must remain visible.                                                     |
| Catch-up inflation                  | Only actual delivered learning is recorded. Unsupported retrospective hours are prohibited.                                                    |
| Qualification mismatch              | Programme withdrawal and qualification outcome/status must be reconciled; partial achievement may still be valid where awarding rules allow.   |
| PICS/ILR mismatch                   | Resolve material differences before submission or claim. Document any legitimate timing difference.                                            |
| Funder-specific rule                | Contract-specific requirements override generic internal assumptions; uncertainty is escalated before data is submitted.                       |
| Suspected intentional falsification | Preserve evidence and escalate under Malpractice/Maladministration and Counter Fraud policies.                                                 |

## 19. Monitoring, Quality Assurance and Continuous Improvement

| Monitoring activity             | Frequency / trigger                                 | Evidence / action                                                              |
|---------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------------|
| Daily register completeness     | Each delivery day                                   | Missing marks, unexplained absence and anomalies corrected/escalated promptly. |
| At-risk learner review          | Same day / weekly as relevant                       | Contact attempts, barriers, support, catch-up and status decisions.            |
| Cohort attendance and retention | At least weekly during active short-course delivery | Patterns by cohort/tutor/mode; identify emerging operational barriers.         |

| Monitoring activity            | Frequency / trigger                     | Evidence / action                                                                                                         |
|--------------------------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Register quality sampling      | Monthly and risk-based                  | Signature/time anomalies, corrections, delivery-hour consistency and PICS triangulation.                                  |
| Withdrawal review              | Each withdrawal / monthly trend         | Reason, re-engagement, actual end date, qualification, ILR and funding accuracy.                                          |
| Equality / SEND pattern review | Termly or delivery-cycle based          | Check whether absence/withdrawal disproportionately affects learner groups; interpret cautiously where numbers are small. |
| Leadership dashboard           | Monthly                                 | Attendance, retention, withdrawals, reasons, re-engagement success and corrective actions.                                |
| SAR/QIP                        | At least annually / monthly QIP updates | Persistent causes become improvement actions with owner, date and impact measure.                                         |
| Funder/audit findings          | On receipt                              | Root cause, correction, wider sample and control improvement.                                                             |

## 20. Roles and Responsibilities

| Role                       | Core responsibility                                                                                                                 | Evidence / assurance                                            |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Managing Director          | Set expectations, resource support/recovery, ensure funding pressure does not distort status decisions and review retention risk.   | Leadership review, dashboard, governance and corrective action. |
| Quality & Compliance Lead  | Own policy, oversee high-risk cases, sample registers/withdrawals, monitor equality and integrate findings into QIP/SAR.            | Sampling, QIP, audit and quality reports.                       |
| Lead Tutor                 | Oversee tutor register standards, assess learning-gap/catch-up feasibility and escalate learners at risk of non-completion.         | Register checks, catch-up plans, tutor action.                  |
| Tutors / assessors         | Record actual attendance, make/trigger absence contact, identify engagement concerns, deliver catch-up and update progress records. | Registers, ILP/reviews, assessment and contact evidence.        |
| Learner Engagement team    | Support day-one confirmation, same-day absence contact, barrier identification and re-engagement activity.                          | Contact logs, re-engagement records and handovers.              |
| MIS / ILR staff            | Apply current status, actual end date, break and withdrawal rules accurately and retain amendment audit trail.                      | PICS/ILR, data reports and correction logs.                     |
| Progressions Officer       | Support employment-related barriers and maintain progression activity without misclassifying delivery attendance.                   | Career Plan/contact/employer evidence.                          |
| DSL / safeguarding leads   | Advise and act where absence/disengagement indicates welfare or safeguarding risk.                                                  | Restricted safeguarding records and appropriate staff guidance. |
| Learners                   | Attend, participate, communicate absence promptly, engage with agreed support and provide accurate information.                     | Registers, communications and review actions.                   |
| Delivery partners / venues | Follow equivalent attendance and incident standards where they create source evidence on Quack's behalf.                            | Partner records, monitoring and assurance.                      |

## Appendix A: Daily Attendance and Register Checklist

| Check                     | Minimum evidence                                                           |
|---------------------------|----------------------------------------------------------------------------|
| Correct cohort/date/times | Register matches approved timetable and actual session.                    |
| Identify                  | Tutor knows who is present; no proxy or advance signing.                   |
| Start check               | Attendance captured promptly; day-one non-attenders followed up.           |
| Late/early                | Material late arrival/early leaving shown accurately.                      |
| Remote participation      | Presence supported by interaction/platform evidence as appropriate.        |
| Absence reason            | Recorded proportionately; sensitive detail kept in correct record.         |
| Same-day action           | Unexplained absence contact attempted and logged.                          |
| Corrections               | Reason, author and evidence retained; original audit trail preserved.      |
| Hours                     | No unsupported GLH or full-session attendance for substantial missed time. |
| Storage                   | Final record retained in approved location and available for audit.        |

## Appendix B: Re-engagement Decision Flow

| Question                                 | Action                                                                          |
|------------------------------------------|---------------------------------------------------------------------------------|
| Did the learner attend?                  | If yes, monitor participation. If no, establish whether absence was notified.   |
| Was there an explanation?                | Record proportionately and assess learning/support impact.                      |
| Is there a safeguarding/welfare concern? | Use DSL/safeguarding route before routine escalation.                           |
| What learning was missed?                | Tutor identifies content, practical work, review or assessment gap.             |
| Can it be recovered validly?             | Plan real catch-up with date/method/evidence, or escalate if not.               |
| Is there a recurring barrier?            | Use support/SEND/IAG/progression referral and a specific action plan.           |
| Has attendance improved?                 | Close enhanced monitoring only when improvement is evidenced.                   |
| Is continuation still realistic?         | If not, consider permitted transfer/break/withdrawal route promptly.            |
| Does learner status match records?       | Reconcile register, PICS, ILP, qualification and ILR before closure/submission. |

## Appendix C: Withdrawal Checklist

| Check                          | Required evidence / decision                                                           |
|--------------------------------|----------------------------------------------------------------------------------------|
| Learner decision / non-contact | Explicit withdrawal evidence or reasonable contact attempts documented.                |
| Last learning                  | Last actual participation established from reliable source evidence.                   |
| Reason                         | Recorded where known and proportionate; no invented reason.                            |
| Safeguarding/support           | Relevant risk checked; safe-contact restrictions observed.                             |
| Re-engagement                  | Support/catch-up/transfer/break options considered where realistic and permitted.      |
| Qualification                  | Assessment/achievement/certificate status confirmed.                                   |
| PICS / ILR                     | Correct status, actual end date and required fields updated promptly.                  |
| Funding                        | Claim/recovery implications reviewed and corrections raised.                           |
| Progression / signposting      | Appropriate future support or re-entry route offered where possible.                   |
| Triangulation                  | Register, learner record, qualification, PICS and ILR tell a coherent story.           |
| Authorisation                  | Required Quality/Compliance sign-off recorded for administrative/high-risk withdrawal. |

## Appendix D: Register Correction and Audit-Trail Checklist

| Question                               | Required control                                                                              |
|----------------------------------------|-----------------------------------------------------------------------------------------------|
| What is changing?                      | Specific attendance mark, time, date or learner entry identified.                             |
| Why was the original wrong?            | Factual reason recorded; "admin error" alone is insufficient where funding could be affected. |
| What evidence supports the correction? | Contemporaneous tutor/learner/platform/evidence source retained.                              |

| Question                                | Required control                                                                  |
|-----------------------------------------|-----------------------------------------------------------------------------------|
| Who requested and who approved?         | Names/roles and date recorded according to risk.                                  |
| Is the original visible?                | Do not delete source history where the system/document can preserve it.           |
| Does it affect GLH/status/funding?      | If yes, MIS/Compliance reviews PICS/ILR/claim impact.                             |
| Does it indicate wider control failure? | Sample other learners/cohorts and raise QIP/malpractice action where appropriate. |

## Appendix E: Version Control and Reference Framework

| Version                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Date        | Owner / author                 | Summary of change                                                                                                                                                                                                                     | Next review |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 1.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | August 2026 | Jessica Roughton / Dion Bishop | New provider-wide policy for accurate attendance evidence, same-day absence response, engagement risk triggers, re-engagement, reasonable adjustments, catch-up, remote attendance, breaks, withdrawal, ILR/funding integrity and QA. | August 2027 |
| <b>Reference framework</b><br>Current Skills Bootcamp technical funding guidance and commissioner contracts; applicable ILR specification and data rules; Equality Act 2010; UK GDPR and Data Protection Act 2018; current Ofsted further education and skills inspection toolkit and operating information; awarding-organisation requirements; and Quack's Teaching Learning and Assessment, Learner Support, IAG/Careers, Quality Assurance and Continuous Improvement, Safeguarding, SEND/EDI, Information Security, IQA, Malpractice/Maladministration, Counter Fraud and Complaints policies. |             |                                |                                                                                                                                                                                                                                       |             |