



READING BLUE COAT

Registration, Attendance, and Students Missing Education Policy

Policy Aims

The aim of this policy is to set out the ways in which Reading Blue Coat School will monitor and ensure regular school attendance, through registration and other procedures, ensuring that all students receive their legal requirement and entitlement for education. The policy also sets out the ways in which Reading Blue Coat will manage circumstances in which students are absent from school for prolonged time and / or without authorisation. The policy further aims to set out ways in which Reading Blue Coat may support families in ensuring school attendance. The School aspires for excellent levels of attendance, so that its students may feel included and gain the full academic and personal benefits of their education. It also recognises the importance of attendance for safeguarding, as absence from school may be indicative of risks to children and young people, and so good attendance provides a further measure for keeping students safe.

Senior Attendance Champion (SAC) and Key Contacts

The Senior Attendance Champion is Dr Guy Williams, Deputy Head (Pastoral)

- Email: gjw@rbc.org.uk

School Secretary (Registration and Attendance)

Email: registration@rbc.org.uk

Reading Blue Coat Values

This policy is designed to ensure that all students have an appropriate and positive experience of school. It will be implemented in accordance with the Reading Blue Coat values of:

- **Aspiration** – for all students to be happy and settled in school
- **Courage** – to question and challenge student absence where appropriate
- **Compassion** – for the circumstances affecting student attendance
- **Service** – helping and assisting with needs to access school
- **Integrity** – being consistent and methodical in ensuring attendance

Responsibilities and Allocation of Tasks

The Senior Attendance Champion will:

- Ensure this policy is kept up to date and is compliant with the law and best practice

- Monitor the implementation of this policy
- Work with all relevant stakeholders to seek improvements to policy and procedures
- Set a clear vision for achieving excellent levels of attendance among students
- Maintain effective systems for tackling absence and ensure their implementation
- Monitor relevant data and trends, in pursuit of excellent levels of attendance
- Communicate clear messages about the importance of attendance to all relevant stakeholders (students, parents, staff)

The Governing Board will:

- Review this policy annually
- Have oversight of the work of the SAC in implementing this policy

The School Secretary (Registration and Attendance) will:

- Have a formal routine for registers being taken accurately each morning and afternoon
- Seek explanations of absences required from students on their return to School
- Make enquiries about unexplained absences, including those within the school day, and follow up with student to ensure that an explanation has been formally given to the School
- Look out for trends or patterns in a student's attendance and inform the SAC of any specific concerns
- Deal with lateness to lessons consistently and promptly
- Discuss non-attendance and / or lateness with students and parents (where possible) and emphasise the importance of punctuality and attendance

All staff will:

- Maintain awareness of the importance of good attendance among students
- Implement any of the specific measures required of them in this policy (e.g., taking registers)

Attendance Requirements

All Reading Blue Coat students in Years 7-11 are expected to attend school every day, throughout school hours, during term times. Reading Blue Coat parents are expected to support this legal requirement. School hours are 08:35-16:10.

Reading Blue Coat students in Years 12-13 are also expected to attend school all day, every day, throughout school hours, during term times. Reading Blue Coat parents are expected to support this requirement. The only exception is that students in Sixth Form may be given permission to leave the School site early, only when they have no further commitments that day, in accordance with criteria set out by the Director of Sixth Form. These criteria and the students affected by them will be communicated directly to students and parents by the Director of Sixth Form and may be amended at any time.

Under no circumstances should students leave the School site during the day without permission; infringing this rule will be treated as a serious behavioural matter.

Students who are ill should not come into school, as per the Reading Blue Coat *First Aid Policy*. Their absence for illness should be notified by a parent as soon as possible, via the Parent Portal.

Students may be absent for medical appointments (dentist, doctors, opticians, physio, etc.), but parents should seek permission for absence in advance via the Parent Portal. Parents are asked to avoid clashes with the School day as far as possible (albeit noting that our school day is longer than most). Requests for absence due to university open days, professional interviews or driving tests should also be submitted via the Parent Portal. These requests will be monitored by the Deputy Head (Pastoral) (SAC).

Requests for any other reason for absence should be sent directly to the Headmaster (HM@rbcs.org.uk), who will decide whether to grant authorisation. Each request will be considered on its merits. Holidays and leisure will always be marked as 'unauthorised absence'. Typical reasons for authorised absence might include religious observance or exceptional compassionate leave. If parents wish to discuss the circumstances surrounding an absence before submitting a leave request, it is recommended that they contact the Deputy Head (Pastoral) (SAC) as the holder of this policy.

Students are expected to attend all lessons and all activities each day, and they are expected to be punctual. Non-attendance of lessons and activities will be treated as a serious disciplinary matter. Students in Years 7-11 who arrive on the School site after 08:45 should sign in at the School Office (Messer Building) before doing anything else. Students in Years 12-13 must sign in at the Sixth Form Office. Lateness to lessons, activities and sport will be monitored via registration; staff should enter the number of minutes a student is late. Students who are late without good reason to registration with their Tutor, period 3 after morning break and period 7 after lunch, should be given a minus point; this should be done by the class teacher. The accumulation of minus points will lead to Friday lunch time detentions as set out in the *Behaviour, Rewards, and Sanctions Policy*. Persistent lateness will be addressed at first through a meeting with the student's Tutor and / or the Head of Year and followed up with parents.

Additional Needs

The School recognises some students may find it harder than others to attend School and will work with those students and parents to try to remove barriers to attendance by building strong and trusting relationships and working together to put the right support in place.

The School will make reasonable adjustments where a student has a disability that puts them at a substantial disadvantage, in comparison with students without a disability, in relation to attendance.

It will also work with parents, and where appropriate with the Local Authority, to develop specific support approaches for attendance for students with special educational needs and disabilities e.g., ensuring the provision outlined in a student's education, health and care plan is accessed.

Suitable strategies will also be considered for students with any social, emotional or mental health issue that is affecting their attendance.

Where barriers are outside of the School's control, the School will work with parents and students to identify alternative sources of support or consider, where appropriate, making a referral for early help.

The School will make a sickness return to the Local Authority if a student is recorded in the attendance register as absent using the national absence code I (unable to attend because of

sickness) and there are reasonable grounds to believe that the students will have to miss 15 consecutive school days or more for illness or the student's total number of school days missed during the current school year because of illness (whether consecutive or cumulative) will reach or exceed 15 school days.

Signing In and Signing Out

Students are expected to be onsite from 08:35. Registration begins at 08:45 and any students arriving after this time will be marked as late.

Students in Years 7-11 arriving after registration (08:45-09:00) must sign in at the School Office (Messer Building). Students in Years 12-13 must sign in at the Sixth Form Office. The staff in the School Office and Sixth Form Office will ask students whether there is a reason for them being late and, depending on the circumstances, the Head of Year may be informed.

Any students departing before 16:10 must sign out in the School Office (Messer Building) or the Sixth Form Centre (Years 12 and 13 only). They will only be given permission to leave if notification from a parent has been received or if it is a regular agreed early departure time, with prior agreement from the parents.

Students not collected after School

At the end of the School day (16:10), those students who are staying for a co-curricular activity must register with the member of staff in charge by 16:30 at the latest. Students staying on the School site, who do not have a co-curricular activity to attend, must go to the Library.

The School site closes at 18:00. If a student is not collected by that time, the traffic attendants and / or duty member of SLT will speak with the student to ensure that they can get home. If a student does not know how to get home, the duty member of SLT will assist them.

Registration

Staff are required to take the register every lesson and, if they are Tutors, in morning registration for their tutees. Staff are also expected to register every student at Activities and Games, where they fall during the School day. Registers must be taken at the start of the lesson, Activity or Games session on iSAMS or SOCS. The presence of each student must be checked individually before marking them as present or absent. If a student is absent from a lesson and does not appear as absent in the iSAMS register or in the daily 'Out of School report' (available via the iSAMS wizard bar under 'Registration Manager') staff should press the 'Alert' button immediately. Once the School Office has received an 'Alert,' the *response to absence* procedure laid out in the *Missing Student Policy* will be initiated. If the 'Alert' button is not available or if a register is being taken on SOCS, any absences should be notified immediately to the School Secretary (Registration and Attendance) via email (registration@rbc.org.uk). For a student unexpectedly absent from Activities or Games, the same approach (giving an alert notification) should be taken.

If a staff member is unable to access iSAMS or SOCS to complete a register, they must email the School Secretary (Registration and Attendance) (registration@rbc.org.uk) with a list of students

absent from that lesson, Activity or Games session immediately after taking the register, as this is potentially indicative of a missing student.

Taking accurate and timely registers is a professional responsibility of all staff leading lessons, Activities or Games, and so staff must be accountable. Where registers are incomplete or delayed, the following process will be followed:

- Stage 1: missing register – prompting from the School Secretary (Registration and Attendance)
- Stage 2: missing register(s), not rectified – email from Deputy Head (Pastoral) (SAC)
- Stage 3: pattern of missing registers – initial meeting with Deputy Head (Pastoral) (SAC)
- Stage 4: persistent problems of missing registers – meeting with the Second Master

As far as possible, SLT will endeavour to prevent non-completion of registers from becoming a staff performance and conduct issue. However, failure of staff to fulfil their responsibilities over time could be understood this way. Members of SLT will put in place support for staff (for example, technical support) to help them fulfil their responsibilities. Where there are practical barriers to the completion of registers, these should be raised with the Deputy Head (Pastoral) (SAC) in the first instance, to attempt to find an agreed solution.

Registration Codes

Registers will be kept electronically on the School's MIS (iSAMS).

Present, Absent and Late registration codes are automatically entered by iSAMS. All other registration codes will be entered by the School Secretary (Registration and Attendance) and should not be amended or over-written by staff. If they are changed in error, the member of staff should email registration@rbc.org.uk.

Where a Sixth Form lesson is not taking place, but has reverted to a study period, staff should notify the School Secretary (Registration and Attendance) (registration@rbc.org.uk) in advance of the lesson and they will populate the lesson with the correct codes.

Record Keeping, Compliance, and Monitoring

Records of attendance will be kept by the School Secretary (Registration and Attendance). They will also oversee submissions for compliance, such as inspection. These records and submissions will be overseen by the Deputy Head (Pastoral) (SAC).

The School Secretary (Registration and Attendance) will monitor student attendance, liaising with the School Secretary (Pastoral), and alert relevant pastoral staff of any unusual or worrying trends: Tutors, Heads of Year, Directors of Section, the Deputy Head (Pastoral) (SAC).

Tutors and Heads of Year are also expected to use the tools available to them to monitor student attendance. In the first instance, any concerns should be discussed with the Director of Section, who will decide how best to proceed and keep the Deputy Head (Pastoral) (SAC) updated (see further, 'student absence' below).

The Deputy Head (Pastoral) (SAC) and the School Secretary (Registration and Attendance) will meet every two weeks to consider recent practice in registration and attendance across the School, including a review of data and / or specific cases or individuals. These meetings will be used to plan interventions, clarifications, improvements, or changes in procedure.

Although independent schools are not required to submit attendance data to the DfE, Reading Blue Coat will maintain records of attendance to the same standards set out in *Working Together to Improve School Attendance* (2024) and will liaise with the local authority officer (Wokingham, Education Welfare Officer, or 'EWO') to ensure appropriateness of record keeping.

Missing Child

If the process of registration reveals that a student is missing, this will trigger the *response to absence* procedure in the *Missing Student Policy*. All staff have a professional responsibility to communicate quickly and accurately about attendance, to ensure that this policy can be implemented appropriately.

Prolonged Absence, School Refusal, and Unauthorised Absence

Whenever a student is absent for a prolonged period (i.e., more than two weeks), the Head of Year will ensure that the matter has been raised with the Director of Section and the Deputy Head (Pastoral) (SAC). It may be that there is no need for further action (e.g., a period of illness, from which the student has recovered), but this may be a trigger for further discussion or investigation of the circumstances.

Rarely, a student may exhibit behaviours to avoid school, refuse to attend school, or have specific mental health needs that make them feel unable to attend. This is a complex set of problems, commonly known as 'school-refusal'. When concerns of this nature emerge, the Director of Section will ensure that the Head of Learning Support and the Deputy Head (Pastoral) (SAC) are made aware. A team of staff, coordinated by the Director of Section, will work together with parents and the student, to seek ways forward. When the number of days of unauthorised absence from such circumstances amounts to 10 or more, the Local Authority will be notified (if not sooner) and further advice sought. Where specific learning needs or mental health conditions are a factor in school-refusing, Reading Blue Coat will make 'reasonable adjustments' to its provision to attempt to make it accessible to the student. These adjustments will be identified by the Head of Learning Support, in consultation with the Director of Section and relevant members of SLT (Pastoral, Academic).

When a student is absent with long-term physical or mental illness (marked on registers as 'illness,' i.e., an authorised absence), from which there is not an obvious or immediate recovery point, the routine management of such cases should include regular consideration of which external agencies / authorities are involved, and whether further contact should be made. For example, where a student is absent for a prolonged period of time, it is always good practice to notify the Local Authority – see further 'Additional Needs' (above). Similarly, if there are concerns as to the accuracy of information submitted by parents about their child's attendance, this may lead to further investigation and / or referral to external agencies (a strategy being agreed by the Director of Section and Deputy Head [Pastoral] [SAC]).

When a student accrues 10 days of unauthorised absence for any reason, the Local Authority will be informed by their Director of Section or the Deputy Head (Pastoral) (SAC). Further advice as to how to manage the absences will be sought as part of that conversation.

When a student is absent for any reason for 3 days or more, it is always good practice for a Tutor to contact home. This helps for the gathering of information but also to show concern for the student's wellbeing.

Even for cases outside of Wokingham, the local EWO will typically be consulted for challenging or complex cases of student absence.

Children Missing Education and Absent from Education

It is a legal requirement for children of school age to attend school, and therefore the School will liaise closely with the Wokingham EWO and the other Local Authorities where students live to ensure that this is the case.

The School recognises that not being registered at a school, or a period of absence from school may be indicative of a safeguarding concern. For this reason, the Deputy Head (Pastoral) (SAC) (also, the Designated Safeguarding Lead: DSL) must always be notified promptly where staff have a concern of this nature.

Where students miss 20 consecutive days of school, then a Child Missing Education referral *must* be made by the DSL (who is also the SAC) or Deputy DSL (in practice, the concern would usually be raised with the Local Authority before then and their advice always takes precedence). Other patterns of absence raising doubts or causes for concerns may also be raised for discussion with the Local Authority, on a case-by-case basis.

Where a student arrives at Reading Blue Coat from another school, the School Secretary (Pastoral) will respond promptly to any queries from the previous school and / or the Local Authority, to confirm that the student is on-roll and continuing with their education. Any concerns will be notified and discussed with the Deputy Head (Pastoral) (SAC).

Where a student of school age departs from Reading Blue Coat part-way through their education ('non-standard transitions'), the School Secretary (Pastoral) will seek confirmation that they are continuing their education elsewhere. If this information is not forthcoming, it will be notified to the Deputy Head (Pastoral) (SAC), who will investigate. If there is doubt as to whether a departing student of school age is continuing their education elsewhere, or if they and their family elect for them to be educated at home, the Deputy Head (Pastoral) (SAC) will contact the Local Authority and, if advised to do so, make a Child Missing Education referral. Any actions of this nature will be recorded in the departing student's file.

The Admissions Office will manage the admission register and ensure that the School fulfils its responsibilities for record keeping and communication with schools and the Local Authority, as set out in statutory guidance (*Children Missing Education: Guidance for Local Authorities, 2016*). The Admissions Office will liaise with the Deputy Head (Pastoral) (SAC) and School Secretary (Pastoral) to ensure full records and compliance.

(See further on the Admission Register below in: Appendix 1).

Toolkit for Supporting Attendance

The following toolkit is a non-exhaustive list of methods that Reading Blue Coat staff may consider in supporting students and families with school attendance. Methods may not be suitable for all students or circumstances, and so it is down to the discretion of pastoral staff as to how best to manage a case. However, the following list may be a helpful starting point:

- Letters noting persistent absence and issuing attendance data certificates
- Meetings with student, family to discuss causes and solutions
- Virtual or at-home meetings, where there is school-related anxiety
- Allowing students to phone home in the day
- Referral to Learning Support
- Recommendations for external support / expertise to the family
- Seeking advice for the School from external organisations, the Wokingham EWO
- Peer support, friendship, buddies
- Reward and recognition for improved attendance
- Sanctions and consequences, at School and at home
- Mentoring, chaplaincy, or counselling support
- Meeting students on transport, in car park, in Reception
- Flexible or revised timetable
- Phased return to school plans
- Advice to teachers and subject-specific interventions
- Contacting previous school (with consent) for more detailed background information, or reviewing any previous safeguarding file
- Comparing with cases managed previously by pastoral staff at the School
- Specialist CPD for Reading Blue Coat staff

Information Sharing

Personal information on attendance will only be shared in line with legal obligations and having regard to government guidance on attendance, safeguarding and children missing education.

The School, Local Authorities and other local partners should work jointly and share data on individual cases where it is of benefit to a student (e.g., health services where there are medical conditions or the police where there are extra-familial harms).

Where appropriate the School's representative will attend regular targeted support meetings.

The School will share information from the registers with the Local Authority as per its requirements. This will include:

- New student and deletion returns
- Attendance returns
- Sickness returns

The law allows Local Authority officers access to the attendance and admission registers of all types of schools to carry out their functions under the Education Acts to support joint working between schools and Local Authorities. These officers are also permitted to take digital or physical extracts of the School's registers.

The School must provide specific student information on request to the Secretary of State.

Where appropriate, the School is expected to inform a student's social worker and/or youth offending team worker if there are unexplained absences.

Staff Training

The School will provide appropriate briefings to ensure that all staff have a good understanding of the importance of attendance and some of the core strategies used to promote it.

Staff with specific responsibilities, i.e., the School Secretary (Registration and Attendance) will receive appropriate training to ensure their ability to fulfil their role. Training topics would include: legal and school requirements, working with partners to provide support, skills to interpret data, overcoming barriers to attendance.

Regulatory Framework, Guidance, and External Resources

This policy has been prepared to meet the School's responsibilities under:


- Education (Independent School Standards) Regulations 2014;
- Education and Skills Act 2008;
- The School Attendance (Student Registration) (England) Regulations 2024;
- Equality Act 2010; and
- Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**)

This policy has been prepared with reference to the following guidance and resources:

- [Working together to improve school attendance](#) (DfE, applies from 19 August 2024);
- [Summary table of responsibilities for school attendance](#) (DfE, applies from 19 August 2024);
- [Toolkit for schools: communicating with families to support attendance](#) (DfE, September 2023);
- [Guidance for parents on school attendance](#) (Office of the Children's Commissioner, September 2023);
- ['Is my child too ill for school?' guidance](#) (NHS, April 2024);
- [Keeping children safe in education](#) (DfE, September 2024);
- [School behaviour and attendance: parental responsibility measures](#) (DfE, May 2020);
- [Children missing education](#) (DfE, September 2016);
- [Supporting students with medical conditions at school](#) (DfE, August 2017);
- [Behaviour in schools: advice for headteachers and school staff](#) (DfE, February 2024);

- [Mental health and behaviour in schools](#) (DfE, November 2018);
- [Mental health issues affecting a student's attendance: guidance for schools](#) (DfE, February 2023);
- [Support for students where a mental health issue is affecting attendance](#) (DfE, February 2023);
- [Remote education guidance](#) (DfE, updated February 2023); and
- [SEND Code of practice: 0 to 25 years](#) (DfE and Department of Health, May 2015).

Document History

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Date of Agreement:	June 2024

Appendix 1: the Admission Register

In accordance with the requirements of the School Attendance (Student Registration) (England) Regulations 2024 the School will:

- maintain an admission register of all students (of both compulsory and non-compulsory school age) admitted to the School (also known as the school roll); and
- inform the Local Authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points.

The admission register will be kept electronically, and a back-up copy of the register is made at least once a month in the form of an electronic or printed copy.

The School will ensure that every entry in the School's admission register is preserved for six years beginning with the day on which the entry was made; and every back-up copy of the register is preserved for six years after the end of the school year that it relates to.

The admissions register contains specific personal details of every student in the School, including their date of admission, information regarding parents and carers and details of the school they last attended.

A student's name will only be deleted from the admission register for a reason set out in regulation 9 of the School Attendance (Student Registration) (England) Regulations 2024. When any of the situations set out in regulation 9 occurs, the student's name must be deleted.

Where the School notifies the Local Authority that the student's name is to be deleted from the admission register, the School will provide it with the following information:

- the full name of the student
- the address of the student
- the full name and address of any parent the student normally lives with
- at least one telephone number of any parent with whom the student lives or can be contacted in an emergency
- the student's future address, the full name and address of the parent who the student is going to live with, and the date the student is expected to start living there, if applicable
- name of the student's other or future school and student's start date or expected start date there, if applicable
- the grounds (prescribed in regulation 9) under which the student's name is to be deleted from the admission register

Appendix 2: the Attendance Register

1 Attendance register

- 1.1 The School records and monitors the attendance of all students (both of compulsory and non-compulsory school age) in accordance with the School Attendance (Student Registration) (England) (Regulations) 2024.
- 1.2 The School uses the appropriate national attendance and absence codes system to enable it to record and monitor attendance and absence in a consistent way which complies with regulation 10 of the Attendance Regulations.
- 1.3 The attendance register is kept electronically and a back-up copy of the register is made at least once a month in the form of an electronic or printed copy. Copies of attendance registers will be kept for six years.
- 1.4 The School will also use these records to identify patterns of poor attendance (at individual and cohort level) and work with students and parents to resolve any issues before they become entrenched.
- 1.5 The School is required by law to take attendance registers twice daily - once at the start of the morning session and once during the afternoon session.
- 1.6 On each occasion it will be recorded whether every student is:
 - 1.6.1 physically present in school when the attendance register begins to be taken; or
 - 1.6.2 absent from the school when the attendance register begins to be taken but attends before the taking of the register has ended; or
 - 1.6.3 attending a place other than the school; or
 - 1.6.4 absent.
- 1.7 The circumstances in which a student may be recorded as attending a place, other than the school, can include:
 - 1.7.1 Attending educational provision arranged by a Local Authority;
 - 1.7.2 For an educational visit or trip arranged by or on behalf of the school and supervised by a member of school staff;
 - 1.7.3 Attending a place for an approved educational activity that is a sporting activity;
 - 1.7.4 Attending an approved educational activity that is work experience provided under arrangements made by the school as part of the student's education;
 - 1.7.5 Attending a place for any other approved educational activity.

2 Recording absence

- 2.1 Absence will be recorded in accordance with the national absence codes set out in regulation 10 of the School Attendance (Student Registration) (England) (Regulations) 2024 and statutory guidance *Working Together to Improve School Attendance* (pp. 76-92) relating to:
- 2.1.1 leaves of absence;
 - 2.1.2 other authorised reasons;
 - 2.1.3 unable to attend school because of unavoidable cause;
 - 2.1.4 unauthorised absence.

3 **Remote education**

- 3.1 The School is required to record all absence from in-person lessons.
- 3.2 The School may, in limited circumstances, provide remote education to enable students, who are well enough to learn but unable to attend the School site, to keep pace with their education.
- 3.3 In the limited circumstances when the School decides to use remote education for individual students when they are absent, the following will be considered:
- 3.3.1 ensuring mutual agreement of remote education by the School, parents or carers, potentially students, and if appropriate a relevant medical professional. If the student has an Education, Health and Care plan or has a social worker, the Local Authority should also be involved in the decision;
 - 3.3.2 if remote education is being used as part of a plan to reintegrate back to school, putting a formal arrangement in place to review its efficacy regularly, alongside identifying what other support and flexibilities can be put in place to help ease the student back to school at the earliest opportunity;
 - 3.3.3 setting a time limit within which the period of remote education provision should be reviewed, with the aim that the student returns to in person education with the required support in place to meet their needs.
- 3.4 Students who are absent from school and receiving remote education still need to be recorded as absent using the most appropriate absence code. The School will keep a record of, and monitor student's engagement with remote education, but this is not formally tracked in the attendance register. Where appropriate, this information may be used to make plans for a student's reintegration to school.
- 3.5 The School will utilise a digital education platform that will be kept up-to-date and keep students safe. Staff will remain trained and confident in its use.

4 **Unauthorised absence**

- 4.1 The "unauthorised absence" code will be used when prior permission for absence has not been given and where the School is not satisfied with the explanation given for absence or delayed attendance meaning that the code for "unable to attend due to an exceptional circumstance" is not appropriate. Examples include:

- 4.1.1 holiday has not been authorised by the School or is in excess of the period determined by the Headmaster;
- 4.1.2 the reason for absence has not been provided;
- 4.1.3 a student is absent from school without authorisation;
- 4.1.4 a student has arrived in school after registration has closed and without reasonable explanation.