

CHILDREN, YOUNG PEOPLE & SKILLS COMMITTEE

ADDENDUM 1

4.00PM, MONDAY, 8 NOVEMBER 2021

COUNCIL CHAMBER, HOVE TOWN HALL

Agendas and minutes are published on the council's website www.brighton-hove.gov.uk. Agendas are available to view five working days prior to the meeting date.

Electronic agendas can also be accessed through our meetings app available through [ModernGov: iOS/Windows/Android](#)

This agenda and all accompanying reports are printed on recycled paper

ADDENDUM

ITEM		Page
38	SCHOOL ADMISSION ARRANGEMENTS 2023-2024	5 - 78

Subject:	School Admission Arrangements 2023-24		
Date of Meeting:	8 November 2021		
Report of:	Executive Director for Families, Children & Learning		
Contact Officer:	Name:	Richard Barker,	Tel: 01273 290732
	Email:	richard.barker@brighton-hove.gov.uk,	
Ward(s) affected:	All		

FOR GENERAL RELEASE

Note: The special circumstances for non-compliance with Council Procedure Rule 3, Access to Information Procedure Rule 5 and Section 100B(4) of the Local Government Act 1972 (as amended), (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were that updated data on pupil forecasts were received on 28 October 2020 and it was considered vital to provide the most up to date figures for the report, prior to consideration of the recommendations. In addition, the school half term break precluded the conclusion of discussions with schools prior to the publication of proposals for a public consultation.

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 This report details the proposed school admission arrangements for the city's schools, for which the Council is the admission authority, for the academic year 2023-24 and provides an indication of current thinking about how the arrangements will need to be shaped for the next few years.
- 1.2 When changes are proposed to admission arrangements, all admission authorities must consult on those arrangements that will apply. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities must consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period.
- 1.3 The committee will, in this paper, be asked to approve a consultation based on the proposals being suggested and will then receive a further report in January 2022 seeking their determination of those arrangements for 2023-24 only.
- 1.4 Local Authorities must also set out schemes for co-ordinated admissions, including key dates in the admission process, and also the arrangements for consultation with own admission authority schools in the city and with other local authorities. They also establish the area (the "relevant area") within which the admission consultation should take place.

2. RECOMMENDATIONS:

- 2.1 The committee agree to make no changes to the council's admission arrangements (other than those listed below) or school catchment areas (where applicable).

- 2.2 That the Committee agree to consult upon a change to the Published Admission Number (PAN) of Bevendean Primary School from 60 to 45 pupils.
- 2.3 That the Committee agree to consult upon a change to the PAN of Carden Primary School from 60 to 30 pupils.
- 2.4 That the Committee agree to consult upon a change to the PAN of Coldean Primary School from 60 to 45 pupils.
- 2.5 That the Committee agree to consult upon a change to the PAN of Queens Park Primary School from 60 to 30 pupils.
- 2.6 That the Committee agree to consult upon a change to the PAN of Rudyard Kipling Primary School from 60 to 45 pupils
- 2.7 That the Committee agree to consult upon a change to the PAN of Saltdean Primary School from 90 to 60 pupils.
- 2.8 That the Committee agree to consult upon a change to the PAN of Woodingdean Primary School from 60 to 45 pupils.
- 2.9 That the Committee agree to make no changes to the “relevant area”.
- 2.10 That the Committee note the expectation that in the next 3-5 years proposals to consult upon a change to the Published Admission Number (PAN) of more schools will be required alongside the possible closure of some primary schools in the city. To best ensure schools are best placed to face this future increasing focus will be placed upon developing more and larger collaborations between schools which it is hoped will provide greater resilience to the challenges that will follow.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Under section 14 of the Education Act 1996 Local Authorities (LAs) have a statutory duty to ensure that there are sufficient schools for primary and secondary education in their areas. The Department for Education (DfE) expects LAs to manage the school estate efficiently and to reduce or find alternative uses for surplus capacity (for example, increasing the provision of early education and childcare) to avoid detriment to schools’ educational offer or financial position. LAs are encouraged to consider all options for the reutilisation of space including via remodelling, amalgamations, or closure where this would be the best course of action.
- 3.2 Admission Authorities are required to determine their admission arrangements annually. Where changes such as a decrease in the PAN are proposed the admission authority must first publicly consult on those proposed arrangements. The [School Admissions Code](#) sets out those groups and individuals who must be consulted. These include parents of children between the ages of two and eighteen, other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions all other admission

authorities such as governing bodies within the relevant area and any adjoining neighbouring local authorities.

- 3.3 Consultation and determination of admission arrangements takes place approximately 18 months in advance of the academic year to which they apply. For the academic year 2023-24 the consultation process must take place between 1 October 2021 and 31 January 2022 and last for a minimum of 6 weeks. It is proposed to start the consultation on 15 November 2021 and for it to run for 7 weeks concluding on 2 January 2022.
- 3.4 Following the consultation exercise the Council must determine its admission arrangements by 28 February 2022 to conform to the requirements of the School Admissions Code. The relevant papers for the 2023-24 admission year for the City of Brighton & Hove are attached as appendices to this report.
- 3.5 LAs must also set out schemes for co-ordinated admissions, including key dates in the admission process, and also the arrangements for consultation with own admission authority schools in the city and with other local authorities. They also establish the area (the “relevant area”) within which the admission consultation should take place.

Admission Priority

- 3.6 There are no proposed changes to the council’s admission priorities or catchment areas.

Published Admission Number

- 3.7 In July 2021, the DfE published national pupil projections. The report can be found [here](#). The projected number of children nationally in state nursery and primary education is expected to fall from 4.596m in 2022 to 4.531m in 2023 and 4.454m in 2024. The report states: “The birth rate increased for over a decade until 2013, when it dropped notably. After a short period of stability, the rates dropped again from late 2016 onwards.”
- 3.8 Children born in 2016 will have started school in either 2020 or 2021. Whilst high level data this, at least, appears not to contradict the working assumption of the council’s own forecasts that project a continued decline in numbers of children requiring school places (Appendix A).
- 3.9 Since 2017 the council has reduced the amount of surplus primary school places by 390 across 11 schools as detailed in the table below.

Previously agreed reductions in PAN through consultation process	PAN changed		Year of change (Sept)
	From	to	
Brackenbury Primary School	60	30	2017
Coombe Road Primary School	60	30	2019
Moulsecoomb Primary School	90	60	2019
West Hove Infant School - Connaught Road	120	90	2019
Westdene Primary School	90	60	2020
Hangleton Primary School	90	60	2021

Mile Oak Primary School	90	60	2021
West Hove Infant School - Connaught Road	90	60	2021
Balfour Primary School	120	90	2022
Benfield Primary School	60	30	2022
Brunswick Primary School *	120	90	2022
Moulsecoomb Primary School	60	30	2022
West Blatchington Primary School	60	30	2022

*Subject to a potential 'late' appeal to the Office of Schools Adjudicator

- 3.10 Starting school places for September 2021 at the city's infant and primary schools were allocated on 16 April 2021. At that time there were 2434 places offered and 386 places unfilled.
- 3.11 The Office of the Schools Adjudicator (OSA) noted in its Annual Report 2019/2020 that there had been a significant rise in LAs applying to the Adjudicator for a variation (a one-year agreement to change the PAN) to determined admission arrangements in order to combat the effect of falling primary rolls. The report sets out that it is the clear expectation of the Schools Adjudicator that LAs should instead be seeking to effect any proposed changes via the annual consultation route as where changes are made to arrangements by variation there is no requirement for consultation and no scope to object to the adjudicator. Moreover, while some bodies are required to be notified of variations, this does not include local parents.
- 3.12 As a result, the council is proposing to make changes to the Published Admission Number (PAN) of seven schools as part of the process of determining admission arrangements for September 2023, reducing surplus places by 150.
- 3.13 In September 2023 the Council is projecting that there will be 2132 applications leaving 538 places unfilled should no further reduction of places take place.
- 3.14 In September 2024 pupil numbers are projected to be 2080 leaving 590 places unfilled if there is no change to current PANs.
- 3.15 The first indication of pupil numbers in September 2025 forecast there will be 1930 applications leaving 740 surplus places should no further reduction of places take place.
- 3.16 It has been a long-standing convention that local authorities should plan to have between 5-10% surplus capacity to allow it to take account of parental preference and fluctuations in pupil numbers. The surplus capacity for September 2023 is expected to be 20% (538/2670) and will rise to 22% (590/2670) in September 2024. By September 2025 surplus capacity is forecast to be 28% (740/2670).
- 3.17 To maintain the maximum recommended surplus capacity approximately 325 school places ($2132 \times 10\% = 213.2$) would need to be removed for September 2023 rising to 382 ($2080 \times 10\% = 208$) school places for September 2024. In September 2025 a total of 547 school places will need to be removed to maintain the maximum recommended surplus capacity ($1930 \times 10\% = 193$). The proposals in this report will not remove sufficient places to maintain the maximum recommended surplus.

- 3.18 Having too many surplus places can lead to schools having financial difficulties when, for example, they have a PAN of 60 pupils but only admit 36 starting school places. Under infant class size regulations, a school must have a maximum of 30 pupils taught by one teacher in Reception, Year 1 and Year 2 and so the school would be required to fund two class teachers with an average class size of 18 pupils.
- 3.19 School funding is mainly pupil-led and where pupil numbers in year groups fall well below 30 (or multiples of) there will be issues of affordability and financial viability. A shift to mixed age classes is the most effective way to mitigate the financial impact.
- 3.20 If the number of surplus places in the city is not addressed some schools could face significant financial issues that will impact on their ability to sustain their school improvement journey. Where schools do not take appropriate action to adjust their expenditure in line with changes in revenue, they risk incurring a deficit budget which has an implication for the council's own budget.
- 3.21 As the admission authority for community schools the council has the responsibility to set the PAN (the numbers of children able to join a school in Year R) for these schools. Therefore, the council must look to reduce the number of surplus places in the city's primary schools as part of its responsibility to ensure a high performing education system.
- 3.22 Once determined interested parties can object to the OSA about the determined arrangements. The School Admissions Code is clear that when objections are considered the OSA must have regard to the strong presumption in favour of an increase to the PAN. In addition, the council has an overriding responsibility to seek to increase opportunities for parental choice.
- 3.23 This means that where schools are in higher demand with parents, changes to the school's PAN would be difficult to achieve. Last year, following the CYP&S committee's determination of admission arrangements, objections to the reduced PAN of three schools were successfully brought to the attention of the Schools Adjudicator. The decisions provided clarity that it is highly unlikely that the Adjudicator would uphold any arrangements determined by the Council which would result in the frustration of parental preference at schools which are currently oversubscribed. It is therefore not a realistic strategy for the council to look to the larger popular schools, which are oversubscribed or admit enough pupils to be close to their PAN as a way of reducing the number of surplus primary school places.
- 3.24 The city is divided into 8 planning areas for school place planning. Consideration has been given to each planning area to identify suitable schools where the PAN could be reduced. However, the council notes the comments of the Schools Adjudicator who stated in the recent appeals that, 'Generally speaking, planning areas do not mean much to parents; family links, ease of access and their views on the ethos of the school and the quality of education it offers weigh much more heavily'.

- 3.25 Pupil numbers are forecast across each planning area using information from GP registration data to give an indication of the number of pupils, school places required and expected numbers of surplus places.
- 3.26 The council is not the admission authority for voluntary aided schools. The responsibility is with the governing bodies of those individual schools. As result the council cannot propose a reduction in the PAN of voluntary aided schools.
- 3.27 The Council has liaised with both Dioceses to seek help to resolve the issues and to encourage their own considered reviews of the provision of primary school places in the city. It is recognised that 11 of the 15 voluntary aided primary schools in the city are already one form entry primary schools. The council is not able to impose its own proposals upon these schools or their Diocesan boards, however the council is working in very close partnership with the Dioceses and moving forward they are keen to work with the council to address the city issue in collaboration. These discussions are positive and ongoing.
- 3.28 The council has a number of stated aims and objectives, including ensuring that schools continue to improve, all children do well, coordinate and improve provision in our schools building on our 'family of schools' model, end the attainment gap for disadvantaged children, protect and improve special educational needs services and improve outcomes and inclusive provision.
- 3.29 It is accepted that it is a significant challenge to work towards some of these stated aims in the context of needing to reduce primary school places. It is not always possible to deliver a strategy to reduce places that will always sit neatly alongside the stated priorities.
- 3.30 However, the recommendations in this paper address the issue of school organisation and contribute to the wider aims of the council's corporate plan by ensuring that schools can operate with more efficient class sizes as the number of pupils continue to fall. This is not a programme which is designed to drive improvement or close the attainment gap.
- 3.31 The council is seeking to remove surplus places in areas of the city where future numbers are falling and proposes changes to schools whose level of applications falls short of the school's capacity and therefore leaves them consistently with surplus places.
- 3.32 The council has strongly urged the larger, oversubscribed schools to play their part in the city's response and to consider reducing their PANs but accepts that the School Admissions Code (and the difficulty in defending objections to previous-proposals) undermines the likelihood of a successful outcome. All schools with more than one form of entry have received high level representation from the council impressing upon them the need to consider their role in a 'family of school's' response.
- 3.33 These meetings have taken place with the Executive Director and Assistant Director meeting with the Headteacher and Chair of Governors to challenge them on the contribution they can make to address the city issue of growing surplus places. We know that when Headteachers, governors and the council work together with a shared city-wide goal success is more likely. Unfortunately to

date, none of these schools have come forward with a willingness to look at options to reduce their PAN. It is this, alongside government policy to strongly support parental preference, that means we are not able to make further proposals to reduce the PAN in these larger schools.

- 3.34 The council is not able to impose its own proposals upon these schools without the potential of a challenge overturning changes after determination. It is not considered an efficient use of public resources to seek to make changes where the considered advice is that there are strong chances of a successful objection that will undermine the council's statutory imperative to ensure an efficient education offer in the city.
- 3.35 Throughout the development of proposals, the council is mindful that parents in the city may seek conflicting outcomes, such as the continued availability of a local school and the opportunity to attend a larger, more subscribed school further than their nearest school. Some parents will be keen that they wish to have a short journey to school where others will be prepared to travel further so that their child can attend the school which they consider to be the right school for their child.
- 3.36 At this time the council is exploring what its future transport plan should look like, this consultation includes the exploration of the role of 20-minute neighbourhoods. The council is committed to becoming carbon neutral and yet some parents may be required to travel further than they would have had to do previously if these proposals are determined. The council will continue to work with schools on developing travel plans that minimise the negative impact of further journeys and to encourage as many of these to be using sustainable methods such as walking, cycling and public transport.
- 3.37 In addition, schools have commented on how they benefit positively from their schools being attended by a diverse range of pupils sometimes from further than their immediate location. They consider that this helps to ensure a high-quality experience for pupils.
- 3.38 Whilst an Ofsted grading is a judgment on a school's delivery of education at a moment in time, the council is cognisant that when considering how many places are available in the city's schools it would be considered by many that the number of places in an Outstanding school should not be reduced.
- 3.39 Some schools in the city are encountering financial pressures. Any deficit licensed by the council must be accompanied by a plan to return to a balance. This is usually over a period of 2-4 years. These plans will be based on estimated pupil numbers in future years.
- 3.40 There are currently 9 primary schools with licensed deficit budgets. Another 14 schools have estimated carry forwards of less than £10,000 and could be considered at risk of moving into deficit. It is accepted that several schools have demonstrated the ability to manage their yearly budget allocation without a significant carry forward or even a small deficit and not face on-going financial difficulty. However, there is a risk that small class sizes will force a school into financial difficulty that will impair the quality of education that can be provided. Of

the 7 schools where changes in PAN are proposed two of them have either a licensed deficit or carry forwards of less than £10,000.

- 3.41 In addition, the council is aware that smaller schools can prove to be where parents with children with additional needs prefer their children to attend. As a result, this can produce additional pressures for the schools in making the right range of support available to meet the needs of all pupils. The council is working with smaller school and its SEN department to consider revised funding arrangements in future years. It is accepted that these proposals may contribute to schools encountering further financial pressures and a reduction in the amount of curriculum variety and extended services available. The council will continue to ensure that this also features in its development and support for further collaborations between schools.
- 3.42 Given the council is unable to impose a PAN reduction on the larger, more popular schools that meet or exceed their current PAN, there will continue to be a high surplus of placements, even if these changes proposed in this report are implemented. It is therefore likely that in the future some schools in the city will be required to close. The council is mindful that closures will have to be proposed for schools where demand for school places is expected to continue to fall.
- 3.43 The pattern of parental preference as fewer children require school places will help to inform future decisions. With less children applying to schools in the medium term it will mean that more schools are likely to receive fewer applications. This will mean the council will have more options to propose reductions in PAN or closure that are less likely to be overturned if objections are raised with the OSA.
- 3.44 It is hoped that the responsibility to do this will not fall solely upon the council in its role as admission authority for community schools. There are 15 church schools in the city and a total of 20 classes in each age group. It can be envisaged that there may need to be closures of some of these schools in addition to changes in the number of community schools. The Council continues to liaise with both the Anglican and Catholic Dioceses.
- 3.45 In addition, the council has also been in discussion with the two primary schools which are a free school and an academy. The council is not the admissions authority for these two schools and is therefore seeking a collaborative approach with both schools as well.
- 3.46 The council will need to ensure that at the point that schools are required to close admission arrangements ensure that there is not a detrimental impact on council priority areas such as narrowing the attainment gap in the city for those who are disadvantaged and giving children the best start in life.
- 3.47 To minimise the number of schools that may be required to close, the council is seeking to work with all of the city's schools to urgently explore what measures can be taken to minimise the financial pressures created by surplus places.
- 3.48 In reality the majority of school funding is assigned to staffing costs and therefore efforts will need to focus upon reducing the cost of running schools that do not fill

their places. Versatility in staffing deployment, lower leadership costs and savings from economies of scale are seen as areas to achieve savings.

- 3.49 However, these are likely to take time to deliver and are dependent upon schools finding the right type of collaboration that allows savings to be realised without the jeopardising the quality of education, the ethos of a school or its connection and engagement to and in its community.
- 3.50 An education disadvantaged strategy has been co-designed with Headteachers and wider partners and consulted upon. The final version is about to be launched and will be brought to the CYP&S committee in early 2022. It builds on significant work that has been undertaken in the City including the development of a Toolkit and Pupil Premium reviews. The plan, informed by evidence-based research, is centred around six themes each with an objective and associated actions. These themes are: Leadership and Governance; Quality First Teaching; Targeted Academic Support; Pupil Voice & Pastoral Support; Language and Literacy; Attendance. Outcomes for disadvantaged pupils remain one of the priorities of the Brighton and Hove Education Partnership and the council remains committed to addressing this through this strategy and will prioritise all work and resources to ensure positive outcomes for these children are addressed alongside these challenging PAN proposals.
- 3.51 There is also a commitment to develop a wider City-wide strategy to support children, young people, and families at risk of disadvantage. This work recognises there are multiple factors creating and compounding issues of disadvantage for children, young people, and families. These often result in poorer educational, health and skills outcomes. There is national evidence that helping families as early as possible and providing the right support at the right time can stop problems getting worse and help families lead happier and healthier lives.
- 3.52 The LA is leading a multi-agency review and development programme on early help with the aim of improving the coordination of services to improve the outcomes of disadvantaged families. The early help development programme and the overarching disadvantage strategy are closely linked and will be developed simultaneously. There will also be clear links to the work of social care for some disadvantaged families. It is anticipated there will be a draft strategy available for full consultation in Spring 2022.
- 3.53 It is accepted that within the context of needing to reduce primary school places it is a significant challenge to plan and deliver that in such a way that aligns fully to the above areas of policy priority.

Developing Proposals

- 3.54 Informal discussions have taken place with headteachers and chair of governors of all schools with two or more forms of entry. The pressure surplus places are placing on the education system and seeking support in contributing to the solutions being developed were highlighted. Whilst it is recognised that governing bodies will predominantly be focussed on their own establishments, the expectation is that they will also consider the implications for the city. It has been

disappointing that after these discussions no proposals from the larger primary schools in the city were put forward to the council for consideration.

- 3.55 In developing the proposals outlined in this report, consideration has been given to the potential impact of a school reducing by a form of entry as a result of schools largely being funded according to pupil numbers. However, whilst there remain concerns about how a one form entry primary school can be sustained it is not possible to avoid recommending changes that potentially create two more one form entry schools and sufficiently reduce the number of surplus places in the city.
- 3.56 The council continues to convene meetings with one form entry schools to look together at the pressures that are unique to schools with no more than 30 pupils in each year group. As referenced in the financial implications, the creation of more one form entry primary schools is not without risk for the council based on the evidence of additional strains on finances coupled with the pressure of change taking place over a period of time.
- 3.57 Current and past pupil numbers indicate the potential future need for a school to operate small classes due to class size legislation. The schools where changes are proposed are predominantly in areas where fewer children live.
- 3.58 Consideration has been given to the impact on the environment of any proposals to reduce the PAN of primary schools in the city. The aspiration is to ensure that the city can support sustainable routes to school that mean it will not be necessary for children to travel by car to school. These proposals seek to ensure that there remain enough school places within a reasonable distance for families to be offered.
- 3.59 It is recognised that each school will have built up a community of current, past and future families which will be affected should proposals to reduce the school's PAN be determined.
- 3.60 The recommendation to include these schools is not a reflection on the leadership or performance of the school. In a city with a strong education offer it is likely that proposals will have to impact on well run, successful schools.
- 3.61 Should all these proposals take effect the number of surplus places in the city will be 388 (538-150) in September 2023, 440 (590-150) in September 2024 and 590 in September 2025 (740-150). This will be 15% (388/2520), 17% (440/2520) and 23% (590/2520) surplus capacity in 2023, 2024 and 2025 respectively, still outside the recognised levels.
- 3.62 Consideration has been given to the impact of these proposals on the 4 schools with a nursery. The School Admissions Code prevents admission arrangements giving children who attend the nursery priority over other children to a place at the school. However, there can be a strong link between the two provisions and therefore the council needs to be mindful of the number of places in the nursery and the proposed PAN for the following schools.

School	Nursery places	Average number of children on roll in the summer term for the past three years	Proposed PAN
Bevendean	52 part-time places (3-4 yr olds)	30 three and four year olds	45
Carden	52 part-time places (3-4 yr olds)	33 three and four year olds	30
Coldean	52 part-time places (3-4 yr olds)	37 three and four year olds	45
Rudyard Kipling	52 part-time places (3-4 yr olds) 24 part time (2 yr olds)	39 three and four year olds 11 two year olds	45

- 3.63 Consideration should be given to the impact of these proposals on the nursery classes. Each school nursery class has 52 part time places for three- and four-year-olds. In addition, Rudyard Kipling has 24 part time places for two-year-olds eligible for nursery provision.
- 3.64 All three and four-year-old children are entitled to a part time place (15 hours a week) and children of working parents a full-time place (30 hours a week).
- 3.65 However, there can be a strong link between the two provisions and therefore the council needs to be mindful of the impact on the nursery classes and the proposed PAN. In these proposals there will be more nursery places available at each school than reception places. This may discourage some parents from choosing the nursery class and could impact on its future viability however, based on average numbers in the past three years only Carden Primary School has had more children attending the nursery than the proposed PAN from September 2023.
- 3.66 Further information on the development of proposals, the decision of the OSA and the impact of mixed aged classes can be found in Appendix B.

Arrangements for future years

- 3.67 The council is mindful that further surplus places will need to be reduced in future years and considers it appropriate to indicate the scale and impact of those potential changes at this time.
- 3.68 As stated in Paragraph 3.14 - 3.15, in September 2024 pupil numbers are projected to be 2080 leaving 590 places unfilled and in September 2025 pupil numbers are projected to be 1930 leaving 740 places unfilled. If all the proposals

put forward in this consultation take effect, there will be 440 places unfilled in September 2024 and 590 places in September 2025.

- 3.69 The early scoping of these further changes has identified that sufficient school places will only be sustained with the reduction of PAN or the potential closure of both community and voluntary aided schools.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The Council could propose to make a change to its current admission arrangements (excluding the PAN of each school) through the consultation process, however, the arrangements are lawful and well-established and no change is currently considered to be required.
- 4.2 The Council could seek to make no change to the PAN of any primary school. Whilst this may ensure the council can meet a greater level of parental preferences it will provide more uncertainty for schools in their planning and could place more schools at risk of financial difficulty. The forecast of future pupil numbers indicates there will be a rise on surplus school places and the OSA has identified the risk to the school and its financial situation if the PAN were to be set too high for the number of pupils expected to attend it.
- 4.3 The Council could propose to change the PAN of other primary or infant schools. In the case of large, popular schools no governing body has indicated a willingness to support proposals to reduce their PAN as part of this consultation
- 4.4 Consideration must be given to the emphasis of the School Admission Code and the recent determinations of the OSA which appear to rule out options involving schools where the impact will be to frustrate parental preference.
- 4.5 The council has proposed that some PANs reduce by less than a form of entry (30 pupils). This is directly in response to the comments made in recent determinations by the OSA who did not 'accept that it is necessary for every school in the local authority area to have a PAN that is a multiple of 30 in order for it to operate in an educationally effective and financially sustainable manner'.
- 4.6 Proposals involving Coldean and Bevendean schools and Woodingdean and Rudyard Kipling schools could have been for a full form of entry reduction at one or other of the schools. However, it was felt that there was no compelling reason to choose one school to have a reduction in PAN over another and potentially create a significant impact on one school near another. It is possible that the consultation process could identify a compelling reason that the CYP&S committee can be mindful of when determining any changes in January 2022.
- 4.7 All admission authorities must consult where they propose a decrease to the PAN. Community schools have the right to object to the Schools Adjudicator if the PAN set for them is lower than they would wish. There is a strong presumption in favour of an increase to the PAN to which the Schools Adjudicator must have regard when considering any such objection.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The Council has previously requested that Headteachers and Chairs of Governors inform it if a future reduction in PAN was a proposal that they would wish to undertake. No schools have indicated a willingness to undertake such a reduction.
- 5.2 If recommended, it is proposed to start the consultation on the reduction of PAN on Monday 15 November 2021 and for it to be concluded on Sunday 2 January 2022.
- 5.3 There will be engagement events specifically focussed on each school in the morning and early evening. In addition, there will be general engagement sessions for anyone who is not specifically interested in specific proposals affecting any one school.
- 5.4 A consultation response form will be available on the council's consultation portal and as with last year's consultation, interested parties will be able to leave a message for someone to call them back and take down their response over the telephone.
- 5.5 Attention will be given to engaging sections of the community who may not previously have participated with public consultations such as those with protected characteristics and this is considered within the Equalities Impact Assessment (Appendix D).
- 5.6 A proposed schedule of public consultation events can be found in Appendix C including details of the consultation hosted on the council's [online portal](#).

6. CONCLUSION

- 6.1 It is proposed to make no further changes to admission arrangements (other than the ones outlined in the report) and to undertake a public consultation with the results and final recommendations coming back to this committee in January 2022.
- 6.2 It is proposed that the Published Admission Number for: Bevendean Primary School, Carden Primary School, Coldean Primary School, Queens Park Primary School, Rudyard Kipling Primary School Saltdean Primary School and Woodingdean Primary School be reduced by a total of 150 places. This will support a reduction in the amount of surplus primary school places available in the city in September 2023.
- 6.3 The council must act to ensure there are not excessive levels of surplus school places in the city. It also holds the financial risk if community schools move into a deficit budget position. However, it only has responsibility as the admission authority to the city's community schools and should have due regard to the content of recent determinations from the OSA and the requirements of the School Admissions Code when considering the options available to it. There is a strong presumption that schools which receive a high number of parental

preferences and can accommodate a higher number of pupils should be able to admit more children than the PAN set for it.

- 6.4 Should all the proposed reductions in PAN be determined after public consultation the council will still have 388 surplus places in September 2023, 440 surplus places in September 2024 and 590 surplus places in September 2025, representing 15%, 17% and 23% respectively.
- 6.5 Once the arrangements for September 2023 are determined it is possible for a variation to be applied to other schools should circumstances require it and reduce more surplus places. Any future decision will be informed by the pattern of parental preference for September 2022, changes of strategic direction by schools in the city and the results of future financial planning.
- 6.6 A further reduction in surplus primary school places is expected to be required in future years. Admission arrangements are determined approximately 18 months before they are implemented. As stated in paragraph 3.1, Local Authorities need to manage the school estate efficiently and to reduce surplus capacity to avoid detriment to schools' educational offer or financial position. These proposals seek to address this one issue, but it is accepted that in doing so other priority areas of education in the city could be affected.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The report sets out the proposals to address the issue of the large number of surplus places in the city's primary schools by making reductions to published admission numbers from September 2023. The impact of this proposal will be to create smaller schools.
- 7.2 Analysis has shown the greatest financial pressures on primary schools within the city are in smaller schools, particularly one form entry schools. This is for a variety of reasons including the lack of economies of scale and low occupancy within year groups, but also because they support a higher concentration of SEND and disadvantaged pupils than larger primary schools.
- 7.3 Of the 9 primary schools currently operating under a licensed deficit budget arrangement, 6 of these are one form entry schools. This equates to 67% of the total primary schools with licensed deficits. In overall terms, one form entry primary schools account for only 36% of the total of primary schools within the city.
- 7.4 The council convenes a meeting with one form entry schools to look together at the pressures that are unique to schools with no more than 30 pupils in each year group. In conjunction with this, work is taking place to look at measures that may mitigate the financial pressures on small schools. However, there are limitations to this given that school funding regulations demand that funding is largely pupil-led. This is particularly challenging where pupil numbers in year groups fall well below 30. In this situation there will almost certainly be issues of financial viability with a change in a school's organisational structure and a shift

to mixed age classes being the most effective way to mitigate the financial impact.

- 7.5 Of the schools where reductions in published admission numbers are being proposed in September 2023, there are two which currently operate under a licensed deficit arrangement. The longer-term financial recovery plans that these schools have submitted may be impacted by a reduction in their PANs.

Finance Officer Consulted: Steve Williams

Date: 17/09/21

Legal Implications:

- 7.6 Section 88C of the School Standards and Framework Act 1998 and the School Admissions (Admissions Arrangements and Co-ordination of Admission Arrangements) Regulations 2012 require admission authorities to determine their admission arrangements annually. Arrangements must be determined 18 months in advance of the academic year to which they apply.
- 7.7 Where changes such as a decrease in the PAN are proposed the admission authority must first publicly consult on those proposed arrangements. The School Admissions Code 2021 states that consultation must be for a minimum of six weeks and must take place between 1 October and 31 January of the school year before those arrangements are to apply. The admission arrangements must be determined by 28 February in the determination year. The arrangements for the admission year 2023/24 must therefore be determined by 28 February 2022.
- 7.8 Community schools and other interested parties have the right to object to the Schools Adjudicator if the PAN set for them is lower than they would wish. The School Admissions Code provides that there is a strong presumption in favour of an increase to the PAN to which the Schools Adjudicator must have regard when considering such an objection. For this determination year any objections to the arrangements must be referred to the Adjudicator by 15 May 2022.
- 7.9 Once admission arrangements have been determined Admission Authorities may propose variations where they consider such changes to be necessary in view of a major change in circumstances. Such proposals must be referred to the Schools Adjudicator for decision following consultation with the governing body of the affected school(s).
- 7.10 The 1998 Act also requires local authorities to establish a relevant area in which admission authorities must consult regarding their admission arrangements. The Education (Relevant Areas for Consultation on Admission Arrangements) Regulations

Lawyer Consulted:

Serena Kynaston

Date: 11/10/21

Equalities Implications:

- 7.11 An Equality Impact Assessment has been carried out on the proposals being recommended to the committee. The assessment can be found at Appendix D and the results have been incorporated into the content of the report.

- 7.12 It is worth noting that the admission process is 'blind', by virtue of applications being considered in line with the published admission arrangements that do not take account of a person's protected characteristics.
- 7.13 However, the availability of school places across the city could have an impact on certain groups by virtue of their proximity to certain schools and the availability of places should families make a late application.
- 7.14 The consultation process needs to take account of young parents who may be less likely to respond to the consultation, issues of accessibility and comprehension of the consultation process and the materials made available as well as ensuring that the decision-making process after the consultation is based on the content not just quantity of replies.
- 7.15 When determining admission arrangements, the council needs to ensure that there are sufficient school places available within a reasonable distance for families who may contain members who have special educational needs, disabilities, speak English as an additional language and of various races/ethnicities. This will ensure that if families apply after the deadline date they will not be significantly disadvantaged and face the prospect of a lengthy journey to school.
- 7.16 It is recognised that to foster strong community cohesion school's intake should seek to reflect the city's diversity.

Sustainability Implications:

- 7.17 Wherever possible the council aims to reduce the number of journeys to school undertaken by car. A reduction in the availability of school places across the city could risk a rise in the number of journeys undertaken by car.
- 7.18 Schools are expected to have a School Travel Plan to:
- reduce the number of vehicles on the journey to school
 - improve safety on the journey to school
 - encourage more active and sustainable travel choices
- 7.19 Any change in PAN is expected to require the school's travel plan to be re-written to take account of the change.
- 7.20 Many primary schools are clustered in areas which means that a reduction in places will not mean a significant increase in journeys to other schools. The consultation period will be an opportunity to explore what the potential impacts of these proposed changes will be and the report to committee in January can be expected to detail these in more detail alongside recommendations for changes to be implemented.

Any Other Significant Implications:

See Appendix 1

SUPPORTING DOCUMENTATION

Appendices:

1. Significant Implications
2. Published Admission Numbers for Primary and Secondary schools.
3. Admission arrangements and priorities for community primary and secondary schools
4. Coordinated scheme of admissions – primary.
5. Coordinated scheme of admissions – secondary.
 - A. Pupil Forecast Sheet
 - B. Developing Proposals
 - C. Proposed Public Consultation events
 - D. Equality Impact Assessment

Documents in Members' Rooms

None

Background Documents

None

Crime & Disorder Implications:

- 1.1 None.

Risk and Opportunity Management Implications:

- 1.2 Any change to school attendance patterns and pupil numbers will impact directly on resource allocation both revenue and capital, and on the Council's ability to meet parental expectations on school places. Pupil data and broader population data is used to identify the numbers of school places required and where they should be located. This feeds into the capital programme so that resources are allocated where they will have the most beneficial effect.

Public Health Implications:

- 1.3 None.

Corporate / Citywide Implications:

- 1.5 School organisation matters help to address the corporate priorities for a growing and learning city and a stronger city. By seeking to ensure through the provision of a local school place that the council addresses the causes of poverty and its impact on our communities and ensures that schools continue to improve, and all children do well.
- 1.6 The allocation of school places affects all families in all parts of the city and can influence where people choose to live. Failure to obtain the desired choice of school can create a strong sense of grievance. The process of expressing a preference and if disappointed, entering an appeal can create intense anxiety for many families in the city. Admission arrangements together with school place planning are framed in such a way as to be mindful of supporting the needs of communities.

Primary Admissions Numbers 2023/24	Planned Admission No. 2023-24
Name of School	
Aldrington CE Primary	60
Balfour Primary	90
Benfield Primary	30
Bevendean Primary	45
Bilingual Primary	90
Brunswick Primary	90
Brackenbury Primary	30
Carden Primary	30
Carlton Hill Primary	30
City Academy Whitehawk	60
Coldean Primary	45
Coombe Road Primary	30
Cottesmore St Marys Catholic	60
Downs Infant	120
Downs Junior	128
Elm Grove Primary	60
Fairlight Primary	60
Goldstone Primary	90
Hangleton Primary	60
Hertford Infant	60
Hertford Junior	60
Hove Junior School (Holland Road)	90
Hove Junior School (Portland Road)	128
Middle Street Primary	30
Mile Oak Primary	60
Moulsecoomb Primary	30
Our Lady of Lourdes	30
Patcham Infant	90
Patcham Junior	96
Peter Gladwin Primary	30
Queens Park Primary	30
Rudyard Kipling Primary	45
Saltdean Primary	60
St Andrew's CE Primary	90
St Bartholomew CE Primary	30
St Bernadette's Catholic Primary	30
St John The Baptist Catholic Primary	30
St Joseph's Catholic Primary	30
St Lukes Primary	90
St Margaret's CE Primary	30
St Mark's CE Primary	30
St Martin's CE Primary	30

St Mary Magdalen Catholic Primary	30
St Mary's Catholic Primary	30
St Nicolas CE Primary	60
St Paul's CE Primary	30
St Peter's Community Primary	30
Stanford Infant	90
Stanford Junior	96
West Blatchington Primary	30
West Hove Infant (Portland Road)	120
West Hove Infant (Connaught Road)	60
Westdene Primary	60
Woodingdean Primary	45
Secondary Admission Numbers 2023-24	
Name of school	Planned admission no. 2023-24
Brighton Aldridge Community Academy	180
Blatchington Mill	330
Cardinal Newman Catholic	360
Dorothy Stringer	330
Hove Park	180
King's	165
Longhill High	270
Patcham High	225
Portslade Aldridge Community Academy	220
Varndean	300

Admission Arrangements for Brighton & Hove Schools 2023/24

Admission Arrangements for Secondary Schools

The Council uses a catchment area system with random allocation being used as the tie breaker in each admission priority in the event of oversubscription. Cardinal Newman Catholic School, King's School, Brighton Aldridge Community Academy (BACA) and Portslade Aldridge Community Academy (PACA) have their own admission priorities (please visit www.brighton-hove.gov.uk/schooladmissions or the schools' websites for details).

If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription priorities are applied in the context of an equal preference system as required by the School Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.*
2. Compelling medical or other exceptional reasons** for attending the school.
3. A sibling link*** applied for those living within the designated catchment area only.
4. Those pupils living in the designated catchment area for the school(s).
5. Other children.

Within all these priorities, the tie break is random allocation.

The current catchment areas are set out in the attached catchment area map. It also includes information about which post codes are in each of the catchment areas.

Admissions Arrangements for Community Infant, Junior and Primary Schools

Parents must make a separate application for any transfer from nursery to primary school and from infant to junior school. If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription priorities are applied in the context of an equal preference system as required by the Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.*
2. Compelling medical or other exceptional reasons** for attending the school.
3. Sibling*** link.
4. For junior schools only: children attending a linked infant school****.
5. Other Children.

Within all these priorities, the tie break is home to school distance which will be measured by the shortest route from the child's home to the nearest of the school's gates. This will be measured by specialist computer software based on Ordnance Survey data. It measures using the road network supplied by Ordnance Survey and some other public rights of way which are paved and lit. Routes across public parks or open spaces will not be accepted. When using roads for measurement purposes the computer measures along the middle of the road. It measures from the address point in the property to the nearest point on the road network and from there to the nearest of the school's gates to the child's home. No other measurement systems will be used for school admissions decisions. Where the home addresses of two or more pupils are an equal distance from the school (e.g. two children living in the same block of flats) and only one place remains available at the school in question, the place will be allocated randomly by computer to one of these pupils.

Late applications

If an application is returned after the closing date without good reason it will be considered after all the on-time preferences have been dealt with and school places allocated to them.

If there is a good reason for the application being late, such as a recent house move to Brighton & Hove, it will be considered as on-time if it is received by 20 January (Secondary) or 8 March (Infant, Primary & Junior) and is accompanied by independent supporting evidence demonstrating why the form is late, e.g. solicitor's letter confirming exchange of contracts or a recently signed tenancy agreement.

Applications submitted after the closing date listing revised preferences will only be considered from July onwards **unless** there has been a house move. This is to ensure that parents and carers who do this do not gain an unfair advantage over others by having the opportunity to list more than three preferences.

Home Address - The school admissions team will allocate school places using the address at which a child lives on the closing date for applications 31 October (Secondary) or 15 January (Infant, Primary & Junior) although late changes of address will be considered if proof of address is received by 20 January (Secondary) or 8 March (Infant, Primary & Junior).

Only one address can be used for admission purposes even if the pupil spends equal time at two households. If it is unclear what is the pupil's main address this will be taken as the address where the child is registered with a doctor.

Deferred admission - Children start school in the school year during which they have their fifth birthday. Children are allowed to start full-time in September or can defer admission or attend part-time until they reach compulsory school age. Children become compulsory school age in the term after their fifth birthday. Children whose fifth birthday falls between 1 September and 31 December may defer or attend part time until January. Children whose fifth birthday falls between 1 January and 31 March can defer admission or attend part time until the start of the summer term. Children whose fifth birthday is between 1 April and 31 August don't become compulsory school age until the following September however they can also defer admission or attend part time until the start of the summer term. Where a place is deferred it will not be given to another child provided the place is taken up by the beginning of the school term following the child's fifth birthday and within the school year that the offer was made.

Parents can request for a 'summer born' child to start school **outside of their normal age group**, and be admitted to reception rather than Year 1 as detailed below.

Admission outside a normal age group

Parents who are applying for their child to have a decelerated entry to school, i.e. to start later than other children in their chronological age group, should initially apply for a school place in accordance with the deadlines that apply for their child's chronological age.

Parents who are applying for their child to have an accelerated entry to school, i.e. to start earlier than other children in their chronological age group, must initially apply for a school place at the same time that other families are applying for that cohort.

Applications should be accompanied with the additional form to request that the child is educated out of year group. Reasons for the request and any evidence to support the case should be included with the form. Evidence could include: information about the child's personal, social, emotional development and academic development; If relevant, medical history and views of a medical professional; whether the child has previously been educated out of year group and whether the child was born prematurely.

The admission authority, will consider each case on its merits taking into account the child's best interests and either agree or refuse the request on that basis. Where the council is the admission authority, the views of the headteacher of each school will be sought before a decision is taken. Parents will be made aware of the outcome of the request for admission out of year group before national offer day and reasons for the decision will be shared

with them. Late requests will be considered up until 8 March (Infant, Primary and Junior) or 22 January (Secondary) if there is good reason why the request could not be made by the closing date for applications. Requests made after this date will not be considered until after national offer day.

Waiting lists

The council holds waiting lists for community schools, and Bilingual primary school. Pupils who have not been offered one of these schools as their first preference will have their name added to the waiting list for this school. Parents can request that their child's name is also added to the waiting list for their second and/or third preference school by contacting the school admissions team. Waiting lists are held until 31st December at which point pupils' names will be removed from the list. Parents can keep their child's name on the waiting list for the following term by contacting the admissions team in the last week of each term to request this. Pupils are added to waiting lists according to the oversubscription priorities listed above and consequently a pupil's name can move down the list as well as up. Waiting lists for secondary schools are called reallocation pools. Each time the council is able to offer a place, or places at a school with a reallocation pool, the list is re-randomised and the place allocated to the child at the top of the list.

Late applicants will also be added to waiting lists as soon as possible after they apply. Late changes of preference (revised applications) will be added to the waiting list for the new preference as soon as possible from July onwards. The pupil's name will be removed from the waiting list for the previous preferences.

Notes:

***Previously looked after children** - Previously looked after children are such children who were adopted (or subject to child arrangements orders or special guardianship orders) immediately following having been looked after and those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

****Exceptional Circumstances** - This priority applies to pupils with a specific need that can only be met by one school rather than any other. This could include medical or social reasons that make it essential for the child to attend a particular school. Independent supporting information must be provided from a professional, for example a doctor, consultant, social worker or other professionals working with the family which makes a compelling case as to why the child's needs can only be met at the preferred school and no other. A medical condition or diagnosis in itself will not automatically result in priority

being given. Advice may be sought from the consultant community paediatrician or other relevant professionals where necessary to determine whether or not the evidence provided is sufficiently compelling to qualify under this category.

*****Sibling link** - For the purposes of the school admissions process, children are siblings if they share the same main address and live as part of the same household. A sibling link will apply if the sibling will be attending the school in September 2022. Where separate junior and infant schools are linked (see linked Infant/Junior school below), the sibling link will apply across both linked schools the sibling may be at either school and may be older or younger. If two children, of whom one is due to start junior school and the other infant school in the same September, the junior school child's allocation will be done first and a sibling link will count for the infant child. A sibling link is only taken into account if children live at the same main address and the sibling has already been allocated a place at the school. Twins or multiple births do not qualify for the sibling link unless one child has already been offered a place. Where a sibling attends a nursery class on the same school site, or a sixth form it will not be counted as a link for admissions purposes.

******Linked infant/Junior Schools** - Children who are attending or have been offered a place at an infant school in the list below will have priority for places at the linked junior school providing the allocation took place by 8 March in the admission year.

Downs Infant - Downs Junior
Hertford Infant - Hertford Junior
Patcham Infant - Patcham Junior
Stanford Infant - Stanford Junior
West Hove Infant Portland Road – Hove Junior Portland Road
West Hove Infant Connaught Road - Hove Junior Holland Road

There is no link between West Hove Infant Connaught Road and Hove Junior Portland Road, or between West Hove Infant Portland Road and Hove Junior Holland Road.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to infant, primary and junior schools – Admissions Year 2023/24 (Admissions to Reception or year 3 of Junior School in September 2023)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school preference form receives one offer of an infant, primary or junior school place. This will be on a set date following the conclusion of the normal admission round for pupils seeking admission to school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), and voluntary aided schools which act as their own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of voluntary aided schools and Academies to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent /carer following the application of the admission priorities by the Local Authority (LA) or by own admission authority schools. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in the area of another Council.

The time scales set out in the scheme will be broadly in line with the time scales used by neighbouring LAs. **Please be aware that governing bodies for VA schools and Academies will need to meet between 20 February 2023 and 10 March 2023 when the ranking order needs to be returned to the Local Authority.**

Key dates

- | | |
|---|------------------|
| • Online application facility available | 1 September 2022 |
| • Distribution of admission booklets | on request |
| • Closing date for applications | 15 January 2023 |

- Preference data exchanged with Voluntary aided schools and other LAs. 20 February 2023
- Consider qualifying late applications. 08 March 2023
- Voluntary Aided schools provide Council with provisional ranking order of all applicants. 10 March 2023
- Finalise allocations and exchange offer details with neighbouring LAs Between 20 March - 6 April 2023
- Finalise allocations and provide schools with offer details. 11 April 2023
- Notification e-mails sent to parents, decisions posted to applicants without an email address 17 April 2023
- Deadline date for acceptance of places 2 May 2023
- Deadline for acceptance of places and appeals to be heard in the main round. 16 May 2023

Process and detailed time scale – infant, junior and primary schools

1. The school admissions guidance published by the City Council will be distributed on request to parents/carers applying for infant or primary school places. A publicity campaign will be launched in September 2022 encouraging parents to apply online. Posters will be sent to schools, other council services, early years settings, the press and other media to remind parents of those pupils requiring a school place to apply.
2. Parents/carers will be invited to list 3 preferences for a school place ranked in order of priority. These may be at a City Community School, an academy, a free School or a voluntary aided school, or any maintained school outside the City of Brighton & Hove. Those residents in the City must use the Brighton & Hove school admission preference form to indicate their preferred schools, either online or by completing a paper form. No other form of application will be valid. The LA allocates places on the basis of equal preferences, and each preference listed will be prioritised on the basis of the published admission priorities for community and own admission authority schools. If it is possible to offer more than one place on the basis of those priorities, the one ranked higher on the application will be offered.
3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. This will provide them with a response which confirms their preference listing and acts as proof of application. Alternatively, the paper form should be completed and returned to their local infant/primary school or to the Admissions Team at Hove Town Hall, Hove **by 15 January 2023**.
4. Where, as part of its admission priorities a voluntary aided school requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that target dates for the exchange of pupil information and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online however, if using an application form rather than the online application parents and carers are strongly advised to return their application via a preferred school. Parents who post the form should understand that proof of posting is not proof of receipt, and they will not have confirmation in the same way as those applying online or returning the form to a school. All maintained infant and primary schools in the city will return preference forms to the LA in as they are received, ideally scanned and sent by email. Schools should maintain a record of the date on which each form was received, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.
6. **No later than 20 February 2023**
- ❖ LA will identify the numbers of preferences (first, second and third) received for each school.
 - ❖ Voluntary aided schools, free schools and academies will be provided with details of parental preferences where their school is given as a preference. They will apply oversubscription criteria to prioritise all preferences. Where pupils have an Education, Health & Care Plan (naming the school) and must be offered a place this will be indicated. These pupils must be given a place at the school in accordance with the SEN and Admissions Code. This applies to all maintained schools, including voluntary aided.
 - ❖ West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers (first, second and third). Where the pupil has an Education, Health & Care Plan this will be indicated.
 - ❖ West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school (first, second or subsequent).
7. **No later than 10 March 2023**
- ❖ Voluntary aided schools, free schools and academies will provide the LA with a list showing children in priority order for places at the school. The list will show which oversubscription criterion was applied to each child, and relevant information to apply any necessary tie-break. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 17 April 2023.
 - ❖ Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.
 - ❖ Consideration will be given to qualifying late applications received before 8 March 2023.
8. **Between 23 March and 6 April 2023**

- ❖ Brighton & Hove will establish whether more than one offer could be made on the basis of the application of its own admission priorities and those of voluntary aided schools, free schools, academies and other LAs. It will determine in each case which is the highest parental ranking.
- ❖ Final lists of school allocations will be prepared.
- ❖ Emails to parents/carers will be prepared.
- ❖ Discussions will take place with other admission authorities as necessary to resolve any remaining unallocated applications.
- ❖ Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

9. 17 April 2023

Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- ❖ If they have not been allocated a school of preference, the reason why not.
- ❖ How places at the preferred schools were allocated.
- ❖ Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body of the school.
- ❖ Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- ❖ The right of appeal to an independent panel, and how to arrange an appeal for a community school or a voluntary aided school.
- ❖ Details about waiting lists for preferences that could not be met.

10. 2 May 2023

Parents and carers should accept offers of places by this date in order to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

11. 16 May 2023

Parents should also have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

12. Proof of address

The LA may require parents/carers to provide proof of address if they are applying for a community school place. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city

Parents/carers moving into the City in the course of the admission process who are making an application on the basis of their new address must provide evidence of either a tenancy agreement of six months or more or an exchange of contracts if they are purchasing a property. Applicants should submit their application by the closing date if possible, especially if their move took place before the closing date, forwarding proof of the move at the earliest opportunity. If they provide an application with the evidence of the move by 8 March 2023 their application will be included in the main admission round.

Late applications received before national offer day

- I. With the exception of families moving into the area and cases as described at V below, applications received after the closing date will not be considered by the LA until allocations have been made for those received before the closing date. Any received for an own admission authority school will be forwarded to the school. The school will decide whether or not there is a good reason to include these late applications in the main admission round but will only consider them if they are received before **8 March 2023**.
- II. Any applications received for community schools in respect of children in care will be included in the main admission round as valid preference at any time up to **8 April 2023**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school ranked highest on the preference form. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications to voluntary aided schools, free schools and academies received on behalf of children in public care will be considered in line with the published admission policy for each school and the requirements of the School Admission Code.
- III. Applications received after the closing date but before the 8 March 2023 will be sent a letter or email allocating a school place on 17 April 2023 or as soon as possible after that date if the volume of late applications is high. Applications received after this date will be sent an allocation letter or email as soon as possible after 17 April 2023.
- IV. Applications received after the closing date will be sent an email or letter allocating a school place as soon as possible after the main notification date of **17 April 2023**.
- V. Parents/carers living in the City who change any preference as a result of a change of address, and who return the new application by **8 March 2023** will have that change considered in the main round of allocations. They will have to provide evidence of their new address and will not have their changed application accepted without that evidence.
- VI. Other late applications where there is a good reason for this will be considered in the main round of allocations if received by **8 March 2023** where independent evidence is given by a third party (usually a professional source such as a doctor or social worker) to support the reason for the delay.

Late applications received after national offer day

- I. Where an application is received after the allocation date, from a parent/carer living in the City, they must use the Brighton & Hove online application or paper form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the form. Where a preference is given for an own admission authority school or a school in a neighbouring LA, the form will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer either as soon as possible once it has reached a decision or has been informed of a decision by the other admission authority.
- II. If a change of preference is received following the decision letter on **17 April 2023** and the home address has not changed, that changed preference will not be considered until July **2023**. This allows reasonable time for the consideration of late first applications and the operation of the waiting list where places have been offered and refused.
- III. All applications received after the beginning of the autumn term 2023 will be regarded as outside this admission round.

Waiting List

- I. Brighton & Hove will operate a waiting list system for its community schools. (Own admission authority schools make their own waiting list arrangements). The waiting list ranking will be based on the LA admission criteria. Rankings within each priority will be determined by home to school distance. All children will be automatically placed on the waiting list for the community school for which they have expressed a first preference, although parents will be given the option of also asking to go on the waiting list for a different preferred school when places are allocated on **17 April 2023**. Places will be offered to children from the waiting list as soon as a place becomes available at an over subscribed school and the admission criteria have been applied. The waiting list will operate until the 31st December.
- II. Parents/carers wishing to keep their child's name on the list for longer than the 31st December they must inform the LA. They must renew the waiting list place each term thereafter.

School Admission Appeals

- I. Parents/carers wishing to appeal against the LA's decision not to offer a place at a preferred school should do so by **16 May 2023** if they want to be assured of having their appeal heard in the main appeal round.

- II. The LA will not arrange an appeal or ask a voluntary aided school to arrange an appeal for a school that was not included on the original application. It will only arrange an appeal for a school which was listed as a preference, as it will not have given a decision to the parent/carer for schools not included on the form. If a parent/carer wishes to receive a decision for a school not included in their original application, and thus acquire a right of appeal, they must complete a further application. However, unless there is a good reason for a change of preference this new form will not be considered until July **2022**.
- III. Parents/carers will receive 10 school days notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.
- IV. Appeals for on-time applications must be heard within 40 school days of the closing date for appeals to be lodged. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct affect on the timing of the appeal hearings.
- V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the pupil and the parent/carer, and in any case within 30 school days.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to secondary schools – Admissions Year 2023/24 (Admissions to year 7 in September 2023)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school preference form receives one offer of a secondary school place at the conclusion of the normal admission round for pupils transferring from primary to secondary school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), Cardinal Newman School, which as a voluntary aided secondary school acts as its own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of the different admission authorities mentioned to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent/carer that it is possible to meet following the application of the admission priorities by this LA or by other admission authorities. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in the area of another Council.

The time scales set out in the scheme work towards the prescribed date (1st March or the first working day following 1st March where it falls at a weekend) on which secondary school place decisions must be notified to parents/carers. It will also be broadly in line with the time scales used by neighbouring LAs.

Key dates

- | | |
|--|----------------------|
| • Online application facility available | 1 September 2022 |
| • Notify year 6 parents of the need to apply | by 12 September 2022 |
| • Distribution of admission booklets | on demand |
| • Closing date for applications | 31 October 2022 |

- Preference data exchanged with own admission authority schools (Cardinal Newman, King's, BACA & PACA) and neighbouring LAs 20-27 November 2022
- Own admission authority schools provide LA with provisional ranking order of applicants. 16 December 2022
- Consider qualifying late applications. 22 January 2023
- Finalise allocations and exchange offer details with Own admission authority schools and neighbouring LAs Between 31 January- 7 Feb 2023
- Notification e-mails sent to parents, decisions posted to applicants without an email address 1 March 2023
- Deadline date for acceptance of places 15 March 2023
- Deadline for appeals to be heard in the main round. 30 March 2023

Process and detailed time scale

1. Information about the application process and how to apply will be distributed to parents via primary and junior schools at the beginning of September 2022.
2. Parents/carers will be invited to list 3 preferences for a school place ranked in order of priority. These may be at a City Community School, an Academy, a Free School or a voluntary aided secondary school, or any maintained school outside the City of Brighton & Hove. Those residents in the City must use the Brighton & Hove school admission to indicate their preferred schools, either the paper or online form. No other form of application will be valid. The LA allocates places on the basis of equal preference, and each preference listed will be prioritised in accordance with the published admission priorities for community and own admission authority secondary schools in the City. If it is possible to offer more than one place on the basis of those priorities, the one ranked higher on the application will be offered.
3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. This will provide them with a response which confirms their preference listing and acts as proof of application. Alternatively, the paper form should be completed and returned to the child's primary or junior school in the City, or to the Admissions Team at Hove Town Hall **by 31 October 2022**. Applicants for Cardinal Newman and/or King's School will need to return their supporting information directly to the school as well as submitting an online application or paper form to the Council. If supporting information is returned to the Local Authority, the documents will be shared with these school.
4. Where, as part of its admission priorities a voluntary aided school, free school or academy within the City or beyond requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that

target dates for the exchange of pupil information between authorities and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online however If using an application form rather than online application parents and carers whose children attend maintained primary schools in the City are strongly advised to return the form via the school. Parents who prefer to post the form should understand that proof of posting is not proof of receipt, and they will not have confirmation of receipt in the same way as those applying online or returning the form to their child's school. All maintained junior and primary schools in the city will return secondary preference forms they receive to the LA as they are received, ideally scanned and sent by email. Schools should maintain a list to record the date on which each form was received, the school preferences, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.

No later than 27 November 2022.

- ❖ LA will identify the number of preferences (first, second or third) received for each school.
- ❖ Own admission authority schools will be provided with details of any parental preference where it gives the school as a preference (first, second or third) received by the LA. It will apply its oversubscription criteria to prioritise all preferences. Where pupils have an Education Health & Care Plan naming the school and must be offered a place this will be indicated. (These pupils must be given a place at the school in accordance with the SEN and Admissions Codes of Practice.)
- ❖ West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers (first, second and third). Where the pupil has an Education, Health & Care Plan this will be indicated.
- ❖ West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school (first, second or subsequent).

No later than 16 December 2022

- ❖ Own admission authority schools will provide the LA with a list showing children in priority order for places at the school. The list will show which admission criterion was applied to each child. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 1 March 2023.
- ❖ Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.

Between 31 January and 7 February 2023

- ❖ Brighton & Hove will establish whether more than one offer could be made on the basis of the application of its own admission priorities and those of voluntary aided schools, free schools/Academies and other LAs. It will determine in each case which is the highest parental ranking.
- ❖ Final lists of school allocations will be prepared.
- ❖ Emails and letters to parents/carers will be prepared.
- ❖ Consideration will be given to late applications received before 22 January, as set out in Appendix A below.
- ❖ Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

1 March 2023

Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- ❖ If they have not been allocated a school of preference, the reason why not.
- ❖ How places at all Brighton & Hove schools were allocated.
- ❖ Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body of the school.
- ❖ Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- ❖ The right of appeal to an independent panel, and how to arrange an appeal for a community school, a voluntary aided school, and in the case of Academies, Free schools and schools in other LA's, who to contact.
- ❖ Details about waiting lists and reallocation pools for preferences that could not be met.

15 March 2023

Parents and carers should accept offers of places by this date in order to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

30 March 2023

Parents should also have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

Proof of address

The LA may require parents/carers to provide proof of address if they apply for a place at a community school. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city

Parents/carers moving into the City in the course of the admission process who are making an application on the basis of their new address must provide evidence of either a tenancy agreement of six months or more or an exchange of contracts if they are purchasing a property. Applicants should return their preference form by the closing date if possible, especially if their move took place before the closing date, forwarding proof of the move at the earliest opportunity. If they provide the form and the evidence of the move by 22 January 2023 their application will be included in the main admissions round.

Late applications received before the 22 January 2023.

- I. With the exception of families moving into the area and cases as described at V below, applications received after the closing date will not be considered by the LA until school allocations have been made for those received by the closing date. Any applications received for own admission authority schools will be forwarded to the school, which will decide whether or not to include the application in the main admission round.
- II. Any preference forms for community schools received in respect of children in care will be included in the main admission round as valid first preferences at any time up to the allocation date on **8 February 2023**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school of first preference, if necessary negotiating with that school to admit beyond the published admission number in order to do so. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications for own admission authority schools and schools in other LA areas for children in care will be considered in line with the admission arrangements for those schools and the requirements of the Admissions Code.
- III. Applications received after the closing date but before the 22 January 2023 will be sent a letter or email allocating a school place on 1 March 2023 or as soon as possible after that date if the volume of late applications is high. Applications received after this date will be sent an allocation letter or email as soon as possible after 1 March 2023.
- IV. Parents/carers living in the City who change a preference as a result of a change of address within the city, and who submit the new application and evidence of the address change will have that change considered in the main round of allocations if it is received by **22 January 2023**. They will have to provide evidence of the address change. Those applications received after that date will be considered as late applications.
- V. Other late applications where there is good reason for the delay will be considered in the main round of allocations if received by **22 January 2023** where independent evidence is given by a third party (usually a professional source such a doctor or social worker) to support the reason for the delay.

Late applications received after the 22 January 2023.

- I. Where an application is received after the allocation date, from a parent/carer living in the City, they must use the Brighton & Hove online application service or paper preference form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the application. Where a preference is given for a free school, an Academy, Cardinal Newman School or a school in a neighbouring LA, the form will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer as soon as possible once it has either reached a decision or been informed of a decision by the other admission authority.
- II. If a change of preference or preference order is received following the decision letter on 1 March 2023 and the home address has not changed (and there has been no other relevant change of circumstances), that changed preference will not be considered until July 2023. This allows reasonable time for the consideration of late first applications and the operation of the reallocation pool where places have been offered and refused.
- III. All applications received after the beginning of the autumn term will be regarded as in-year applications and outside this admission round.

Re-allocation Pool

- I. Brighton & Hove will operate a re-allocation pool system for its community schools. The ranking of re-allocation pools will be based on the Brighton & Hove admission criteria. All children will be automatically placed in the re-allocation pool for all un-met first preferences for community schools. Parents/carers will be asked to indicate if they also wish to be placed in the re-allocation pool for a different preferred school when the allocation emails and letters are sent on 1 March 2023. Places will be offered to children from the pool as soon as a place becomes available at an over subscribed school and the admission priorities have been applied. This LA will notify other LAs as appropriate if it offers a place from the pool at a Brighton & Hove school to a pupil living outside the City. The pool will operate until the 31st December.
- II. Own admission authority schools (BACA, PACA, Cardinal Newman and Kings) and other local authorities will operate their own waiting list/reallocation arrangements. If they are able to place a child resident in Brighton & Hove in one of their schools, they are asked to notify this LA at the earliest opportunity.
- III. Parents/carers wishing to keep their child's name in the reallocation pool beyond the 31st December must inform the LA. They must renew the position on the reallocation pool each term thereafter.

School Admission Appeals

- I. Parents/carers wishing to appeal against the LA's or a voluntary aided school's decision not to offer a place at a preferred school should do so in writing or using the online appeal facility by 30 March 2023 if they want to be assured of having their appeal heard in the main appeal round.
- II. The LA will not arrange an appeal or ask an own admission authority school to arrange an appeal for a school that was not included on the original application. It will only arrange an appeal for a school that was listed as a preference, as it will not have given a decision to the parent/carer for schools not included on the application. If a parent/carer wishes to receive a decision for a school not included in their original preference, and thus acquire a right of appeal, they must complete a further application. However, unless there is a change of address or other change of circumstances leading to the change of preference this new form will not be considered until July 2023.
- III. Parents/carers will receive 10 school days notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.
- IV. Whilst the City Council, other LAs and the Governing Bodies of Academies and voluntary aided schools will make every effort to hear appeals within 40 school days of the deadline for submitting appeals, as suggested in the Appeals Code, they cannot guarantee this time scale. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct affect on the timing of the appeal hearings.
- V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the parent/carer or if appropriate to the student, and in any case within 30 school days of the appeal being lodged.

Date of Birth / school year	School yr in Sept 22	Grand Total all planning areas from 2021 data	pupils likely to want a school place based on 90% of GP reg data	Permanent places in Year R in 2022	Surplus places or shortfall of places	Comparison with 2020 data	
All planning Areas						Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021
places in each school year from Sept 2022							
01 September 11 to 31 August 12	6	3,005	2,705				
01 September 12 to 31 August 13	5	2,860	2,574				
01 September 13 to 31 August 14	4	2,891	2,602				
01 September 14 to 31 August 15	3	2,747	2,472				
01 September 15 to 31 August 16	2	2,708	2,437				
01 September 16 to 31 August 17	1	2,669	2,402				
01 September 17 to 31 August 18	R	2,486	2,237	2,670	433	357	76
01 September 18 to 31 August 19	2023	2,369	2,132	2,670	538	476	62
01 September 19 to 31 August 20	2024	2,311	2,080	2,670	590	594	-4
01 September 20 to 31 August 21	2025	2,144	1,930	2,670	740		

Date of Birth / school year	School year in Sept 2022	Portslade	Central Hove	West Blatchington and North Hangleton	Central City	Patcham	City East	The Deans	City North
All planning Areas									
places in each school year from Sept 2022									
		1	2	3	4	5	6	7	8
		270	660	90	600	150	450	270	180
		0	0	0	0	0	0	0	0
01 September 11 to 31 August 12	6	253	0	0	0	167	0	0	0
01 September 12 to 31 August 13	5	228	0	0	0	207	0	0	0
01 September 13 to 31 August 14	4	253	0	0	0	150	0	0	0
01 September 14 to 31 August 15	3	248	0	0	0	161	0	0	0
01 September 15 to 31 August 16	2	212	0	0	0	174	0	0	0
01 September 16 to 31 August 17	1	237	0	0	0	153	0	0	0
01 September 17 to 31 August 18	R	222	600	86	433	149	403	176	168
01 September 18 to 31 August 19	2023	229	572	85	413	120	389	166	159
01 September 19 to 31 August 20	2024	176	554	77	415	127	414	154	164
01 September 20 to 31 August 21	2025	176	519	47	430	96	377	137	148

Date of Birth / school year	School year in Sept 2022	BN41 1	BN41 2				Comparison with 2020 data	
1 Portslade		St Peters Primary Benfield Primary St Marys Primary	Brackenbury Primary St Nicolas Primary Mile Oak Primary Peter Gladwin Pri	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
	places in each school year from Sept 2022	90	180	270				
01 September 11 to 31 August 12	6	93	188	281	253			
01 September 12 to 31 August 13	5	68	185	253	228			
01 September 13 to 31 August 14	4	78	203	281	253			
01 September 14 to 31 August 15	3	82	193	275	248			
01 September 15 to 31 August 16	2	64	172	236	212			
01 September 16 to 31 August 17	1	73	190	263	237			
01 September 17 to 31 August 18	R	81	166	247	222	48	49	-1
01 September 18 to 31 August 19	2023	72	182	254	229	41	44	-3
01 September 19 to 31 August 20	2024	72	123	195	176	95	85	10
01 September 20 to 31 August 21	2025	58	137	195	176	95		

Date of Birth / school year	School year in Sept 2022	BN3 1	BN3 2	BN3 3	BN3 4	BN3 5	BN3 6	BN3 7				Comparison with 2020 data	
2 Central Hove		Hove Juniors Holland Road Brunswick Primary		West Hove inf @ Connaught St Andrews Primary		West Hove Infant Hove Junior	Cottesmore Primary Bilingual Primary School	Aldrington Primay Goldstone Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
	places in each school year from Sept 2022	90		150		120	150	150	660				
01 September 11 to 31 August 12	6	77	48	116	108	169	152	158	828				
01 September 12 to 31 August 13	5	77	43	108	93	147	143	158	769				
01 September 13 to 31 August 14	4	87	52	134	93	162	153	148	829				
01 September 14 to 31 August 15	3	79	34	124	71	147	131	141	727				
01 September 15 to 31 August 16	2	93	45	91	63	153	135	146	726				
01 September 16 to 31 August 17	1	65	39	139	82	140	103	138	706				
01 September 17 to 31 August 18	R	85	39	122	58	141	107	115	667	600	60	39	21
01 September 18 to 31 August 19	2023	73	44	110	72	135	106	96	636	572	88	63	25
01 September 19 to 31 August 20	2024	78	46	104	78	122	85	103	616	554	106	96	10
01 September 20 to 31 August 21	2025	79	47	120	44	119	83	85	577	519	141		

Date of Birth / school year	School year in Sept 2022	BN3 8				Comparison with 2020 data	
3 West Blatchington and North Hangleton		Hangleton Primary West Blatch Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
	places in each school year from Sept 2022	90	90				
01 September 11 to 31 August 12	6	124	124				
01 September 12 to 31 August 13	5	113	113				
01 September 13 to 31 August 14	4	132	132				
01 September 14 to 31 August 15	3	116	116				
01 September 15 to 31 August 16	2	115	115				
01 September 16 to 31 August 17	1	89	89				
01 September 17 to 31 August 18	R	95	95	86	5	-3	8
01 September 18 to 31 August 19	2023	94	94	85	5	11	-6
01 September 19 to 31 August 20	2024	85	85	77	14	16	-3
01 September 20 to 31 August 21	2025	52	52	47	43		

Date of Birth / school year	School year in Sept 2022	BN1 2	BN1 3	BN1 5	BN1 1	BN1 4	BN1 6	BN1 7	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Comparison with 2020 data	
4 Central City			St Mary Mags Prim St Pauls Primary	Stanford Infant Stanford Junior Westdene Primary	Middle Street Primary	St Bartholomews	Downs Infant Downs Junior Balfour Primary St Bernadettes Pri	Hertford Infant Hertford Junior St Josephs Primary	TOTALS			Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
places in each school year from Sept 2022			60	150	30	30	240	90	600				
01 September 11 to 31 August 12	6	22	73	132	7	57	211	112	614				
01 September 12 to 31 August 13	5	27	63	138	8	38	198	94	566				
01 September 13 to 31 August 14	4	30	65	127	7	51	195	98	573				
01 September 14 to 31 August 15	3	23	58	125	≤5	60	201	94	561				
01 September 15 to 31 August 16	2	25	83	105	16	59	155	97	540				
01 September 16 to 31 August 17	1	34	55	110	13	57	155	95	519				
01 September 17 to 31 August 18	R	27	69	106	6	33	155	85	481	433	167	120	47
01 September 18 to 31 August 19	2023	19	77	84	10	60	148	61	459	413	187	162	25
01 September 19 to 31 August 20	2024	32	73	78	14	42	143	79	461	415	185	170	15
01 September 20 to 31 August 21	2025	26	81	99	10	60	127	75	478	430	170		

Date of Birth / school year	School year in Sept 2022	BN1 8	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Comparison with 2020 data	
5 Patcham		Patcham Infant Patcham Junior Carden Primary	TOTALS			Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
places in each school year from Sept 2022		150	150				
01 September 11 to 31 August 12	6	186	186	167	-17		
01 September 12 to 31 August 13	5	230	230	207	-57		
01 September 13 to 31 August 14	4	167	167	150	-0		
01 September 14 to 31 August 15	3	179	179	161	-11		
01 September 15 to 31 August 16	2	193	193	174	-24		
01 September 16 to 31 August 17	1	170	170	153	-3		
01 September 17 to 31 August 18	R	165	165	149	2	0	2
01 September 18 to 31 August 19	2023	133	133	120	30	36	-6
01 September 19 to 31 August 20	2024	141	141	127	23	37	-14
01 September 20 to 31 August 21	2025	107	107	96	54		

Date of Birth / school year	School year in Sept 2022	BN2 0	BN2 1	BN2 2	BN2 3	BN2 5	BN2 9	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Comparison with 2020 data	
6 City East		Queens Park Pri St John the Baptist Primary			Elm Grove Primary Fairlight Primary St Martins Primary	St Marks Primary City Academy Whitehawk	Carlton Hill Primary St Lukes Primary	TOTALS			Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
places in each school year from Sept 2022		90			150	90	120	450				
01 September 11 to 31 August 12	6	53	58	≤5	96	158	140	505				
01 September 12 to 31 August 13	5	57	55	≤5	78	155	140	485				
01 September 13 to 31 August 14	4	56	51	≤5	81	146	123	457				
01 September 14 to 31 August 15	3	46	41	≤5	77	142	128	434				
01 September 15 to 31 August 16	2	55	50	≤5	98	120	129	452				
01 September 16 to 31 August 17	1	53	52	≤5	102	129	137	473				
01 September 17 to 31 August 18	R	49	37	≤5	89	137	136	448	403	47	34	13
01 September 18 to 31 August 19	2023	40	54	≤5	87	117	134	432	389	61	54	7
01 September 19 to 31 August 20	2024	44	62	≤5	92	121	141	460	414	36	46	-10
01 September 20 to 31 August 21	2025	41	48	≤5	105	99	126	419	377	73		

Date of Birth / school year	School year in Sept 2022	BN2 6	BN2 7	BN2 8			Comparison with 2020 data		
7 The Deans		Rudyard Kipling Pri Woodingdean Prim	Our Lady of Lourdes Pri St Margarets Pri	Saltdean Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
places in each school year from Sept 2022		120	60	90	270				
01 September 11 to 31 August 12	6	114	37	100	251				
01 September 12 to 31 August 13	5	115	46	84	245				
01 September 13 to 31 August 14	4	131	22	89	242				
01 September 14 to 31 August 15	3	121	36	93	250				
01 September 15 to 31 August 16	2	114	34	83	231				
01 September 16 to 31 August 17	1	124	32	75	231				
01 September 17 to 31 August 18	R	100	28	68	196	176	94	107	-13
01 September 18 to 31 August 19	2023	92	27	65	184	166	104	89	15
01 September 19 to 31 August 20	2024	85	20	66	171	154	116	127	-11
01 September 20 to 31 August 21	2025	78	20	54	152	137	133		

Date of Birth / school year	School year in Sept 2022	BN1 9	BN2 4				Comparison with 2020 data	
8 City North		Coldean Primary	Bevendean Primary Coombe Rd Primary Moulsecoomb Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2020 data	Number of surplus places have risen fallen between 2020 and 2021 by
places in each school year from Sept 2022		60	120	180				
01 September 11 to 31 August 12	6	59	157	216				
01 September 12 to 31 August 13	5	54	145	199				
01 September 13 to 31 August 14	4	56	154	210				
01 September 14 to 31 August 15	3	46	159	205				
01 September 15 to 31 August 16	2	45	170	215				
01 September 16 to 31 August 17	1	54	164	218				
01 September 17 to 31 August 18	R	50	137	187	168	12	11	1
01 September 18 to 31 August 19	2023	37	140	177	159	21	17	4
01 September 19 to 31 August 20	2024	34	148	182	164	16	18	-2
01 September 20 to 31 August 21	2025	32	132	164	148	32		

Appendix B - Developing Proposals

- 1.1 The council's approach to addressing the issue of reducing demand for school places due to falling numbers of children in the city has developed over time. Initially where governing bodies have wanted to reduce their PAN these requests have been accommodated.
- 1.2 More recently the focus has been upon looking at where pupils are living and adjusting the number of places available to align with the number of children requiring places. There has also been a focus upon larger primary schools where the impact of a reduction in a form of entry would have less of a proportionate effect on that school.
- 1.3 The council has also focussed on, or proposing changes of, a full form of entry (30 places) to minimise the impact of schools having to adjust to mixed age classes and the demands that would put on teachers.
- 1.4 The recent determinations by the Schools Adjudicator has required the council to adapt its local approach to reflect the principles outlined in the school admission code.
- 1.5 The Schools Adjudicator has made the following observations:
- 1.6 "many schools educate children successfully without having groups of approaching 30 children of the same year group; many have classes with more than one year group, often known as mixed age classes. Mixed age classes may be less popular with parents and are more complicated to manage but I do not accept that it is necessary for every school in the local authority area to have a PAN that is a multiple of 30 in order for it to operate in an educationally effective and financially sustainable manner".
- 1.7 "Planning areas are useful tools but many parents prefer their children to attend schools outside of the planning area in which they live, as suits their circumstances."
- 1.8 "The evidence shows that the local authority has reduced the PAN at the school in order to secure an effect that 30 children every year will attend other schools so that the budgets and futures of these other schools are protected. This will clearly significantly frustrate parental preference and so would need powerful justification."
- 1.9 "I have been provided with no evidence and I have seen none in the committee report provided to me that any school is at risk of closure if the number of vacant places across the local authority is not reduced. Therefore I do not consider the stated potential risk of other schools closing as a justification for reducing the PAN at the school"
- 1.10 There is, however, little evidence that the parents of more than 30 children will want to attend the school...therefore I see a risk to the school and its financial situation if the PAN were to be set at 60 without creating any

particular benefit. That risk is shared with the local authority which is also the admission authority”.

- 1.11 As a result, the council is seeking to remove surplus school places where there will be limited frustration of parental preference. In other words, reducing places at schools which are currently not admitting up to, or close to, their PAN.
- 1.12 In addition, the council is proposing four schools reduce by half a form of entry (15 pupils), admitting 45 pupils instead of 60 pupils.
- 1.13 Decisions were taken based on the pattern of applications and the numbers of pupils forecast to be living in the area. This would mean that over time the schools are likely to see the following pattern of classes.
- 1.14 For the benefit of this modelling no account of the forms of entry in other year groups in the school has been considered. It is possible that where there are surplus places in other years groups different groupings could be put in place.

		Chronological Year Groups										Classes	Total	
		Year R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6						
Calendar Year	Year 1	45											45	
		23	22										2	45
	Year 2	45	45											90
		Year R	Year R/1	Year 1										
	30	30	30									3	90	
	Year 3	45	45	45										135
		Year R	Year R/1	Year 1	Year 2									4
	30	30	30	23	22									135
	Year 4	45	45	45	45									180
		Year R	Year R/1	Year 1	Year 2	Year 2/3	Year 3							6
	30	30	30	30	30	30								180
	Year 5	45	45	45	45	45								225
		Year R	Year R/1	Year 1	Year 2	Year 3	Year 3/4	Year 4						8
	30	30	30	23	22	30	30	30						225
	Year 6	45	45	45	45	45	45							270
		Year R	Year R/1	Year 1	Year 2	Year 3	Year 3/4	Year 4	Year 5	Year 5				10
	30	30	30	23	22	30	30	30	23	22				270
	Year 7	45	45	45	45	45	45	45	45	45				315
		Year R	Year R/1	Year 1	Year 2	Year 3	Year 3/4	Year 4	Year 5	Year 5/6	Year 6			11
	30	30	30	23	22	30	30	30	30	30	30			315

- 1.15 There is research into the effect of mixed age groups in primary education and one overview of national and international research from the Cambridge Open-Review Educational Research e-Journal vol 6 2019 pp165-179, examines 28 significant studies in this area. On the issue of attainment, this research overview paper states:
- 1.16 ‘The majority of studies identified no significant differences in mixed-age or single-grade student performance and about an equal number found either slight positive or negative significant results.’ (P.170)
- 1.17 While no clear evidence re outcomes for pupils, the overview cites research that indicates parent views tend to be negative as do teachers where there is a conviction that these groupings increase organisational and time demands on teachers. Mixed-age students in one study were found to have

more negative views of their own behaviour and believe themselves to be less popular.

1.18 In summary, research does not seem to indicate much impact on attainment, but seems to indicate that teachers and parents prefer a 'single-grade' system because they fear negative consequences and teachers fear the additional organisational demands on their time. There does not seem to be much hard evidence of benefits.

1.19 Regarding OfSTED, they have found that the structure and organisation of a class should not on its own affect the quality of education. However, their research indicates that streaming does not improve pupil outcomes and if schools are mixing ages and can have an adverse effect on some pupil groups. It would not therefore be desirable if schools began to organise classes by perceived ability. There is also the potential for disadvantaged pupils to be adversely affected through bias or perception, in effect being kept in the "lower" sets or groups. In exam/assessment years schools may consider it appropriate to keep pupils separate for at least part of the day which could lead to additional resourcing and financial challenges for the school.

Public Consultations – Appendix C

- 1.1 A proposed schedule of public consultation events has been put forward incorporating a range of public meetings and a consultation response form hosted on the council's [online portal](#).
- 1.2 It is proposed that the consultation would start on 15 November and close on 2 January 2022. Allowing a 7-week consultation period. A report will then come back to the Children Young People & Skills committee on 10 January 2022 with a summary of the responses received and a recommendation as to the next steps to take.
- 1.3 It is proposed that information events will be held during the period of consultation so that the proposals can be explained and any questions answered. In addition, the events will be an opportunity to receive comments from the public.
- 1.4 At the time of writing the report it proposed that of the two events scheduled for each school, one will be held in person and one will be held online via Microsoft Teams.
- 1.5 It is anticipated that events either specifically for a school proposal or more broadly in relation to the proposals, as a whole, will be held on the following days at the times stated in the table below. These will be an opportunity for the proposal to be discussed in more detail, answer any questions that people may have and allow for comments about the proposal to be captured.

Date	School	Meeting 1	Meeting 2
17 November	Open event	10:00 Click here to join the meeting	18:00 Click here to join the meeting
18 November	Bevendean	10:00 Bevendean Primary School	18:00 Click here to join the meeting
23 November	Open event	10:00 Click here to join the meeting	18:00 Click here to join the meeting
24 November	Open event	10:00 Click here to join the meeting	
25 November	Carden	10:00 Carden Primary School	18:00 Click here to join the meeting
30 November	Coldean	10:00	18:00

		Coldean Primary School	Click here to join the meeting
1 December	Open event		18:00 Click here to join the meeting
7 December	Saltdean	10:00 Saltdean Primary School	18:00 Click here to join the meeting
8 December	Rudyard Kipling	10:00 Rudyard Kipling Primary School	18:00 Click here to join the meeting
9 December	Woodingdean	10:00 Woodingdean Primary School	18:00 Click here to join the meeting
14 December -	Queen's Park	10:00 Queen's Park Primary School	18:00 Click here to join the meeting
15 December	Open event	18:00 Click here to join the meeting	
16 December	Open event	15:00 Click here to join the meeting	

Equality Impact and Outcome Assessment (EIA) Template - 2019

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups². They help us make good decisions and evidence how we have reached these decisions³.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age¹³) or use the hyperlinks ('Ctrl' key and left click).

For further support or advice please contact:

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)**

1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed⁴.

Title of EIA⁵	Consultation on Council's Admission Arrangements 2023/24	ID No.⁶	
Team/Department⁷	Families, Children & Learning – Education & Skills		
Focus of EIA⁸	<p>Any proposed changes to the council's admission arrangements which includes reducing a school's Published Admission Number (PAN) is required to be consulted upon for a minimum of 6 weeks between October and 31st January approximately 18 months in advance of taking effect. Admission arrangements and each school's PAN for September 2023 will be consulted upon in November/December 2021 with the results of this consultation being presented to the Children Young People & Skills Committee in January 2022.</p> <p>The aim of the consultation process is to seek the views of other admission authorities, adjoining neighbouring local authorities, schools' governing bodies, parents of children between the age of 2 and 18 and any other people who are interested in the admission arrangements.</p>		

Significant changes proposed in the consultation are to reduce the number of surplus school places in the city by 150 places which would bring the percentage of spare capacity closer to the recommended range by the Department for Education of between 5 – 10%.

Pupil numbers in the city have been falling and are forecast to continue to fall over the next few years. Too many spare school places in the city will result in some schools not getting enough pupils attending. As schools are mostly funded on pupil numbers if schools don't have enough pupils attending, they may not be able to operate in a financially efficient way. The law prohibits infant school classes larger than 30 pupils and if schools are required to operate small classes, they may not be able to afford to employ the required number of teachers.

The council's main aim with these proposals is to reduce the number of surplus places in the city and the risk of a school or schools being forced into financial difficulty which both risks incurring a deficit budget, which has implications for the council's own budget and will impair the quality of education that they can provide.

The council is seeking to remove surplus school places where there will be limited frustration of parental preference. In other words, reducing places at schools which are currently not admitting up to, or close to, their PAN.

This Equalities Impact Assessment is looking both at the consultation process to ensure that it is conducted fairly and has engaged with the public appropriately as well as considering the potential impact of the proposals themselves, if they are agreed.

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know ⁹ ? Summary of data about your service-users and/or staff	What do people tell you ¹⁰ ? Summary of service-user and/or staff feedback	What does this mean ¹¹ ? Impacts identified from data and feedback (actual and potential)	What can you do ¹² ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹³	<p>Parents of children between the age of 2-18 need to be consulted.</p> <p>Changes will affect parents of children born between 1/09/2018 and 31/08/2019 who are due to start school in September 2023.</p> <p>There are projected to be 2438 children in this age bracket, and it is estimated 2194 will require a mainstream school place.</p> <p>When applying for a first school place 98% did so online for both 2021 and 2020.</p>	<p>The consultation in 2019 received no responses from people under the age of 30.</p> <p>Consultation in 2020 received 802 responses in total however only 15% of responders provided their age with the youngest being 18 and the oldest over 70.</p> <p>Out of the responses in 2020 where age was provided 14% were under 30. 12% were aged between 30-39; 29% aged between 40-49; 22% were aged between 50-59 and 14% were 60 or older.</p>	<p>There was an increase in younger parents responding to the consultation last year compared to previous years.</p> <p>Respondents aged between 30 and 49 accounted for about 50% of the responses.</p> <p>Younger parents are increasingly using the online system to apply for school places.</p>	<p>Further engagement with childcare providers and nurseries in the city to continue to engage younger parents and parents of younger children.</p> <p>Liaise with support services such as Parenting Team, Family Coaches and Youth Employment Service to continue encouraging participation from younger parents.</p> <p>Greater use of social medial platforms and online promotion to reach younger parents in conjunction with traditional methods of promotion.</p> <p>Consideration of timing of any public consultation events so parents with young families can</p>

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				attend.
Disability¹⁴	Children with Special Educational Needs and Disabilities (SEND) who have an Education, Health & Care Plan would be placed in school under the SEND code of Practice by the SEN team and normal admission arrangements and PANs would not apply.	<p>Consultation in 2019, 2% of online respondents identified as having a disability. 65% did not consider themselves to have a disability and 33% did not provide a response.</p> <p>Consultation in 2020, less than 1% identified as having a disability. 11.5% did not consider themselves to have a disability and 87.7% did not provide an answer to this question.</p> <p>There were no requests last year for consultation documentation in alternative formats and all responses were submitted online or by email.</p>	<p>Parents of children with a disability may be more interested in SEND processes than mainstream school admission arrangements.</p> <p>Parents with a disability could find it harder to respond through the online consultation portal or attend an event in person.</p> <p>Parents with children who have a disability may not be able to attend a consultation event in person.</p> <p>Parents with disabled children or have a disability themselves may not be able to travel a distance to take their child to a school place.</p>	<p>Consultation documentation should be available in other accessible formats and this should be advertised more widely.</p> <p>Parents who are unable to attend a public meeting will be able to access information online or over the telephone. It may be that if consultation events are held online information can be viewed after the event.</p> <p>Nurseries will be encouraged to identify families who need additional support to access the information materials.</p> <p>The council will also liaise with PaCC and</p>

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				Amaze and any adult/parent disability groups. There needs to be sufficient school places within a reasonable distance of families including those families who have someone with a disability living with them.
Gender reassignment¹⁵	n/a			
Pregnancy and maternity¹⁶		Parents who are pregnant or on maternity leave may find it difficult to get older children to school.	There needs to be sufficient places within a reasonable distance of families including those families who have someone with a disability living with them.	Consideration needs to be given to ensuring that there are enough school places within a reasonable distance from families where there is a pregnant adult or an adult on maternity leave.
Race/ethnicity¹⁷ Including migrants, refugees and asylum seekers	The percentage of ethnic minority families with children attending schools across all planning areas varies	Consultation on admission arrangements in 2019, only 2% out of the 82 respondents identified as other than	In some allocation years a higher percentage of pupils from ethnic minorities apply late or are directed to a school	Important to ensure that there are some surplus places in each planning area so there are local school places available

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>from 20% in the Patcham planning area to 32% in the City East planning area. These percentages are relatively similar across the primary year groups however, in both City East area and Central city planning area the data available for pre-school pupils indicates an increased percentage for this cohort.</p> <p>There is no comprehensive race/ethnicity data available for the cohort due to start school in September 2023.</p> <p>In 2019 allocation year 20% of all applications were from ethnic minority families and there is no ethnicity information for a further 27% of applicants. 30% of late applications were submitted by ethnic minority families and for a further 30% there is no</p>	<p>white British. 31% of respondents did not answer this question or did not want to specify their ethnicity.</p> <p>For the consultation in 2020, 3% identified as other than white British and 9% identified as white British. 88% of respondents did not answer this question or did not want to specify their ethnicity.</p> <p>Feedback from the Ethnic Minority Achievement Service (EMAS) in relation to the 2020 consultation indicated that many parents from ethnic minorities or with English as an additional language found the consultation confusing even with assistance. There was a reluctance to participate from some groups as they felt that it didn't affect them partly</p>	<p>that was not a preference, however the percentage of ethnic minority pupils who received a place at their first preference school is comparable with the percentage of all families receiving their first preference school in each of the 2018 and 2019 cohorts.</p> <p>The previous consultation process either did not sufficiently engage with ethnic minority families or those who did provide a response were unwilling to divulge their ethnicity.</p>	<p>for any late applicants.</p> <p>Other methods of engagement with ethnic minority communities considered in order to increase responses to the consultation, including the use of the EMAS service to continue to reach out to communities to communicate the proposals in the consultation and the potential impact on their community.</p> <p>Highlight that there is a translation function on the council's website so that consultation information can be viewed in different languages.</p> <p>Hard copy consultation materials to be made available in different languages as required.</p>

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	ethnicity information. 90% of ethnic minority families who applied received their first preference school.	due to the uncertainty of the housing situations so children may have to move schools anyway and they trust that whatever school parents get it will be a good school. The difficulty of not being able to attend a local school was however identified as a potential problem.		
Religion or belief¹⁸	There are only Church of England and Catholic faith schools within the city. These schools can prioritise children of the faith above other children. A number of these schools do prioritise children of other faiths above children of no faith. None of the faith schools are proposing a reduction in PAN for September 2023. 23% of first preference applications for September 2021 were for	There is little information on this. Some parents will seek a secular education for their child whilst others will want their children taught in line with their religious belief.	All schools identified for a reduction in PAN are community schools and this could potentially have a disproportionate impact on pupils with no faith.	Faith schools in the city are responsible for their own admission arrangements and the council cannot consult on changes to their PAN. The council will need to ensure that there are sufficient secular school places available for all residents who require one within a reasonable distance. Consultation events will take place in secular buildings wherever possible.

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	church aided schools and 77% expressed a first preference for secular schools.			
Sex/Gender¹⁹	There are no single sex, maintained schools in the city. Admission arrangements do not take into consideration the gender of the child.	58% of responses to the 2019 consultation were submitted by females and 11% by males. 30% did not answer or preferred not to say. 10% of responses to the 2020 consultation were submitted by females and 3% by males. 87% did not answer or preferred not to say.		
Sexual orientation²⁰	n/a			
Marriage and civil partnership²¹	n/a			
Community Cohesion²²	The list of schools identified are central to various different communities in the city. Some are situated in	House prices surrounding popular schools can be inflated, due to increased demand on accommodation close to popular schools.	Can have an implication on the pupils offered a place at these schools as families who cannot afford to move close to oversubscribed schools	Consideration of admission arrangements and tie break to remove advantage to families who are in the financial position to move close to

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>communities with a higher level of deprivation than others.</p> <p>10 LSOAs ranked within the 10% most least deprived areas for example: Withdean; Preston Park; Hove Park.</p> <p>15 LSOAs within the 10% most deprived areas of Britain for example: Whitehawk; Hollingdean; Moulsecoomb.</p>	<p>Parents from some socio-economic groups are better able to lobby and to instigate a cohesive community response to the proposals that may disproportionately influence the decision making about which schools will have their PAN reduced.</p> <p>Some communities may not be adequately represented in public meetings or in the responses to the consultation.</p>	<p>are unable to obtain a place there.</p> <p>Responses to this consultation need to be considered based on the content not just quantity of replies as some areas in the city due to the nature of the community will provide significantly more replies and in a variety of ways.</p>	<p>popular schools in order to increase chance of obtaining a place.</p> <p>Encourage communities in all areas of the city to engage in the consultation process and provide alternative methods for them to respond.</p> <p>Take consideration of the impact of any change in PAN may have on a school in relation to the composition of pupil cohorts and their families to promote a comprehensive education offer.</p>
Families with English as additional language	<p>The percentage of pupils with English as a second language varies across the primary school planning areas from 8% Patcham to 18% in City East planning areas.</p>	<p>There is little information on this. However, we are aware of the level of consultation responses of those who are identified as other than white British. It is also considered likely that families with English as an additional language</p>	<p>Families with pupils who have English as an additional language are proportionally more likely to apply late which significantly reduces their change of being offered a place at an oversubscribed school.</p>	<p>Important to ensure that there are still surplus places in each planning area so late applicants and pupils moving mid-year can be offered a place at a local school.</p> <p>Greater emphasis needs to be made in future to</p>

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		<p>may struggle to understand the detail and implication of the proposed changes to the admission arrangements in the city.</p> <p>Information that interpreters could be available for public meetings for particular languages with a high prevalence in the community would help encourage participation from these families.</p>	<p>The higher number of families with English as an additional language applying late could be contributed to a number of factors such as these families moving into the city outside the cut off dates for the main admission rounds. This could be due to these families are not being aware of when to apply for school places as they are less likely to understand the promotional information distributed for parents.</p> <p>Families may not comprehend the implication of the proposals or which year they take effect and be able to relate this to their own circumstances.</p>	<p>reach these families and make them aware of the school admissions applications process. If this group are unaware of the school admissions timescale it is also likely that they would less aware of the consultation process. Additional steps should be taken to engage these families with this consultation.</p> <p>Advice and support shall need to be sought from the EMAS team and others with links to various communities where there are a number of families with English as an additional language.</p> <p>For public meetings with a focus on a particular community, explore with individual schools the languages spoken and benefit of providing interpreters.</p>

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				Highlight that there is a translation function on the council's website so that consultation information can be viewed in different languages.
Cumulative impact²³	Some families wishing to participate in the public consultation may fall into more than one category.	It is evident that they may encounter a number of barriers to engagement.	If a family were to fall within more than one of those areas highlighted it might further impact on their ability to engage in the public consultation	Ensure all actions that have been identified to minimise the existence of multiple barriers to engagement for families with multiple protected characteristics.
Assessment of overall impacts and any further recommendations²⁴				
<p>Reducing the number of surplus school places is necessary to safeguard the whole family of schools in the city and to protect schools from financial difficulties as pupil numbers reduce. Without a reduction in school places there is the real possibility that some schools become unable to operate in a financially efficient way with implications for the quality of education provided and the council's own budget.</p> <p>A higher percentage of late applications are for children from ethnic minorities and children with English as an additional language although the numbers are small. Late applications for oversubscribed schools are less likely to be offered a place. To minimise the impact on these families of applying late more needs to be done to reach these families when reminding parents to apply for their child's school place.</p> <p>The consultation process must be as accessible as possible for all residents to respond to. Whilst the implications of Covid-19 on public consultation events later in the Autumn is still unclear, there is a need to ensure that materials are available and accessible to all. That</p>				

Groups to assess	What do you know⁹? Summary of data about your service-users and/or staff	What do people tell you¹⁰? Summary of service-user and/or staff feedback	What does this mean¹¹? Impacts identified from data and feedback (actual and potential)	What can you do¹²? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
<p>events are held at a variety of times and in locations which allow interested residents to participate and the process of receiving responses is also available to all.</p>				

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)

5. Prioritised Action Plan²⁵

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
<p>Disabled parents and parents with children who have a disability may find it more difficult to participate in the consultation process</p>	<p>Consultation documentation made available in accessible formats and this should be advertised more widely.</p> <p>Parents who are unable to attend a public meeting will be able to access information online or over the telephone</p> <p>Nurseries will be encouraged to identify families who need additional support to access the information materials.</p> <p>The council will also liaise with PaCC and Amaze and any adult/parent disability groups.</p>	<p>Greater participation in the consultation by disabled parents and parents whose children have a disability.</p>	<p>Increased proportion of responses to consultation made by parents with a disability</p>	<p>Before and during consultation period</p>
<p>The previous consultation process either did not</p>	<p>Other methods of engagement with ethnic minority communities</p>	<p>Greater participation in the consultation by parents from ethnic</p>	<p>Increased proportion of responses to consultation made by</p>	<p>Before and during consultation period</p>

<p>sufficiently engage with ethnic minority families or those who did provide a response were unwilling to divulge their ethnicity.</p>	<p>considered in order to increase responses to the consultation, including the use of the EMAS service to reach out to communities to communicate the proposals in the consultation and the potential impact on their community.</p> <p>Highlight that there is a translation function on the council's website so that consultation information can be available in different languages.</p> <p>Hard copy consultation materials to be made available in different languages as required.</p>	<p>minority families.</p>	<p>parents from ethnic minorities.</p>	
<p>Some communities may not be adequately represented in public meetings or in the responses to the consultation.</p>	<p>Encourage communities in all areas of the city to engage in the consultation process and provide alternative methods for them to respond.</p>	<p>Increased participation in the consultation from communities less likely to participate in the past.</p>	<p>Responses received to the consultation from parents living in all areas in the city.</p>	<p>Before and during consultation period</p>
<p>Ensure that families with English as an additional language are aware of the consultation and are</p>	<p>Advice and support sought from the EMAS team and others with links to various communities where</p>	<p>More Families with English as an additional language aware of the consultation and able</p>	<p>Greater number of responses to consultation from this group.</p>	<p>Before and during consultation period</p>

<p>able to participate.</p>	<p>there are a number of families with English as an additional language.</p> <p>Highlight that there is a translation function on the council's website so that consultation information can be available in different languages.</p> <p>Hard copy consultation materials to be made available in different languages as required.</p>	<p>to participate.</p>		

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Staff member completing Equality Impact Assessment: Saul Johnston Date: 15.10.21

Directorate Management Team rep or Head of Service/Commissioning: Richard Barker Date: 18.10.21

CCG or BHCC Equality lead: Date:

Guidance end-notes

¹ The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

² Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by people due to their protected characteristics
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

³ EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

⁴ **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

Do you need to complete an EIA? Consider:

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

⁵ **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁶ **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

⁷ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁸ **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

⁹ **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?⁹
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#>) and national ones where they are relevant.

¹⁰ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.
- Identify any gaps in who has been consulted and identify ways to address this.

¹¹ Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹² Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

¹³ **Age:** People of all ages

¹⁴ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

¹⁵ **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

¹⁶ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁷ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

¹⁸ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

¹⁹ **Sex/Gender:** Both men and women are covered under the Act.

²⁰ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²¹ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²² **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

²³ **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

²⁴ **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

²⁵ **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.

