

<b>Subject:</b>	<b>School Admission Arrangements 2022-23</b>
<b>Date of Meeting:</b>	<b>11 January 2021</b>
<b>Report of:</b>	<b>Executive Director for Families, Children &amp; Learning</b>
<b>Contact Officer:</b> Name:	<b>Richard Barker,</b> Tel: 01273 290732,
Email:	<b>richard.barker@brighton-hove.gov.uk,</b>
<b>Ward(s) affected:</b>	<b>All</b>

**FOR GENERAL RELEASE****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 2022-23.
- 1.2 The report provides an update on the outcome of the consultation on the proposed changes to the Published Admission Number of nine schools.
- 1.3 The committee will be asked to approve the recommendations in this report and determine the admission arrangements, including the scheme for co-ordinated admissions and the "relevant area" for the academic year 2022-23.

**2. RECOMMENDATIONS:**

- 2.1 That the committee agree to make no changes to the council's school admission arrangements or secondary school catchment areas, except for the changes listed in sub- paragraphs 2.2- 2.10 below, which will result in a reduction in the total of primary school places in the city by 240 places and a reduction of secondary school places by 120 places.
- 2.2 That the committee agree to a change to the Published Admission Number (PAN) for Balfour Primary School from 120 to 90 pupils.
- 2.3 That the committee agree to a change to the Published Admission Number (PAN) for Benfield Primary School from 60 to 30 pupils
- 2.4 That the committee agree to a change to the Published Admission Number (PAN) for Brunswick Primary School from 120 to 90 pupils
- 2.5 That the committee agree to a change to the Published Admission Number (PAN) for Downs Infant School from 120 to 90 pupils
- 2.6 That the committee agree to a change to the Published Admission Number (PAN) for Goldstone Primary School from 90 to 60 pupils

- 2.7 That the committee agree to a change to the Published Admission Number (PAN) for Moulsecoomb Primary School from 60 to 30 pupils
- 2.8 That the committee agree to a change to the Published Admission Number (PAN) for Stanford Infant School from 90 to 60 pupils
- 2.9 That the committee agree to a change to the Published Admission Number (PAN) for West Blatchington Primary School from 60 to 30 pupils
- 2.10 That the committee agree to a change to the Published Admission Number (PAN) for Hove Park School from 300 to 180 pupils
- 2.11 That the Committee agree to make no change to the co-ordinated scheme for admissions or to the “relevant area”.

### **3. CONTEXT/ BACKGROUND INFORMATION**

- 3.1 The School Admission Code determines the procedure by which the Published Admission Number of schools is set and amended. The council is required to abide by this statutory guidance to ensure the correct procedures are followed. Therefore, it is not possible to manage the situation more flexibly without following the process outlined in the School Admission Code requires the involvement of the Schools Adjudicator.
- 3.2 The Code also outlines who must be consulted in relation to school admission arrangements. This includes 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 within the relevant area and any adjoining neighbouring local authority areas, where the admission authority is the local authority.
- 3.3 Pupil numbers overall across the city have been falling and are forecast to continue to fall over the next few years.
- 3.4 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 and risk entering a budget deficit. The council holds the financial risk if community schools move into a deficit budget position.
- 3.5 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 and this could ultimately mean that schools are forced to close.
- 3.6 The council is responsible for school place planning which includes both ensuring there are sufficient school places in the city when pupil numbers grow and to ensure there are not too many surplus places when pupil numbers fall as is the present situation. If the council is unable to manage this effectively the Secretary of State could intervene, and schools could be closed as a result.

- 3.7 The council is committed to keeping schools open and to try to avoid the risk of an increase in schools experiencing financial pressures. The proposals aim to sustain all schools in the city by identifying a range of schools to play a part in reducing the surplus of school places.
- 3.8 By seeking to only reduce the PAN of some schools in the city, it will ensure that the physical accommodation is available when the city receives an upturn in pupil numbers without a new capital programme being required.
- 3.9 Where it is feasible, proposals include large schools where there are projected to be fewer children in future years (in the council defined planning area for that school), however the council is the admissions authority for community schools only and cannot set the admissions number for other schools. The council has not proposed changes to schools which were oversubscribed with first preferences for September 2020 except where the planning areas would sustain the reduction in places.
- 3.10 The council has remained in dialogue with both the Diocese of Chichester and Diocese of Arundel & Brighton in relation to the projection of surplus places. As the admission authority for 15 primary schools in the city both Dioceses have a role to play but it is recognised that 11 of those schools are already one form entry primary schools.
- 3.11 On 21 September 2020, all schools were advised via a Schools Bulletin article, of the agreement of the CYP&S committee on 14 September 2020 to undertake a consultation on the proposed reduction of PAN at 9 schools.
- 3.12 On 5 October 2020, all schools were notified of the consultation and requested to draw parents' attention to the consultation. All documentations were supplied with the bulletin.
- 3.13 The consultation started on 5 October 2020 and closed on 27 November 2020. It was open for 8 weeks and a total of 54 days.
- 3.14 The council has endeavoured to publicise the consultation by issuing press releases and advertising the consultation through various social media channels. Nursery and childcare providers in the city have been directly contacted to encourage participation in the consultation.
- 3.15 A series of public meetings were arranged to facilitate discussion about the proposals and to collect views. Two meetings were arranged with a focus on each school featuring in the proposals, one during the daytime and one in the early evening. Due to the situation with Covid-19 the public meetings were held virtually through Microsoft Teams. Many of the meetings were well attended but there were IT difficulties reported for some families which made participation difficult.
- 3.16 An offer was made for parents to contact the council to discuss the proposals and provide verbal response to the consultation that could be recorded by officers, however this offer was not taken up by any respondents.

- 3.17 Endeavours were made to encourage responses to the consultation from groups in the city who might not usually participate with consultations on School admissions. PACC and Amaze issued information to parents in their community about the proposals and consultation, the Trust for Developing Communities was asked to do the same. EMAS (Ethnic Minority Achievement Service) provided information, advice and assistance to complete the consultation to families through their Home, School Liaison workers.
- 3.18 The council has been able to update its projection of future pupil numbers with information provided in November 2020 about the number of GP registrations in the city. In total the council anticipates that the following number of places are required:
- September 2022 - 2,313  
September 2023 - 2,194  
September 2024 - 2,076
- 3.19 There are currently 2820 spaces in the reception year across the city. This means that there will be the following number of surplus places:
- September 2022 - 507  
September 2023 - 626  
September 2024 - 744
- 3.20 Whilst the projection of pupil numbers fluctuates each year there is a clear trend of increasing surplus places. For the purpose of planning school places the city's primary schools are split into eight planning areas and the numbers of children requiring places within those areas is shown in Appendix 6.
- 3.21 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, new arrivals in the city and small fluctuations in pupil numbers. The surplus capacity for September 2022 is currently 18% (507/2820), 22% (626/2820) in September 2023 and will rise to 26% (744/2820) in September 2024.
- 3.22 To maintain the recommended surplus capacity approximately 300 school places (207/2820= 7%) would need to be removed for September 2022. 8 Infant and Primary schools have been identified totalling 240 school places and if all of these proposals go ahead there will be 267/2580 = 10% surplus capacity in September 2022.
- 3.23 If the proposed reduction in PAN's were all to take place, in September 2023 there would be (386/2580) 15% surplus capacity rising to (504/2580) 20% in September 2024 suggesting the need to identify further schools for a reduction of PAN in future years in order to maintain surplus capacity below 10%.
- 3.24 Based upon current projections for September 2022 and if all the proposed reduction in PAN's were to take place, Central Hove would have 9 surplus places, Portslade would have 49 surplus places, Central City would have 60 surplus places and City North would have 11 surplus places. West Blatchington & North Hangleton would have insufficient places for 3 pupils living in that area

should all pupils express a preference to attend either school in the planning area.

- 3.25 School census data from January 2020 indicates that 23 reception pupils living outside the West Blatchington & North Hangleton planning area attend either West Blatchington Primary or Hangleton Primary school with 45 reception pupils living in this area attend schools elsewhere. This demonstrates a net loss of 22 reception pupils. Similarly, from the October 2020 census 34 reception pupils living outside the West Blatchington & North Hangleton planning area attend the two schools with 60 reception pupils living in this area attend schools elsewhere. This gives a net loss of 26 reception pupils.
- 3.26 There is evidence that more pupils living in the West Blatchington & North Hangleton planning area attend schools in other areas than live elsewhere and travel to attend schools in this area. Taking account of this trend it is expected that with a reduced PAN for West Blatchington all pupils living in this planning area will still be able to secure a place at one of these schools if this is requested.
- 3.27 Housing developments in the city add to the number of pupils requiring a school place but this impact is small in comparison to changing birth rates. It has been shown that different types of housing produce different numbers of additional pupils. If all of the 11,122 units of accommodation identified in the City Plan to be delivered by 2030 are realised this would generate an additional 1,023 primary age pupils by 2030. If these pupils were generated evenly over the next 10 years we would expect an additional 9 primary age pupils per year group each year across the whole city.
- 3.28 The School Admission Code details that once admission arrangements have been determined for a particular school year, they cannot be revised by the admission authority unless the admission authority consider such changes to be necessary in view of a “major change in circumstances”. Such proposals must be referred to the Schools Adjudicator for approval.
- 3.29 However, a variation to increase a school’s PAN is not required to be referred to the Schools Adjudicator and can be determined by the admission authority, this is the council for community schools.
- 3.30 In seeking committee approval at this stage to the reduction in the PAN at these schools the Council is aiming to avoid the uncertainty of a later application to the Schools Adjudicator, seeking a variation to admission arrangements that have been previously determined. Any such application would carry a risk that the Schools Adjudicator might not consider a low level of applications for a school to be a “major change in circumstances” when pupil projections are already indicating a rising number of surplus places across the city. A school could then be left with small class sizes which may present a financial pressure to the school.
- 3.31 If any subsequent increase to the PAN of a particular school is required, should the number of applications mean an additional class is required to ensure children have a place at a local school, the Council will be able to determine the

increase without reference to the Schools Adjudicator and in dialogue with the governing body of the school.

- 3.32 No primary schools have indicated a willingness to support the need for a reduction in surplus school places in the city through a reduction in their PAN from September 2022.
- 3.33 All proposals have been put forward by the council as part of its strategic responsibilities and it is accepted that governing bodies tasked with ensuring the school's clarity of vision, ethos and strategic direction may not proactively support a change in its PAN.

## Consultation

- 3.34 There were 802 responses to the consultation submitted through the council's consultation portal. At the time of writing this report there were an additional 42 emails/letters providing comments and a petition against one of the proposals containing 100 signatories. Tables 1 below shows the range of respondents made through the consultation portal:

**Table 1**

Option - How have you be responding to this consultation?	Total	Percent
Brighton & Hove resident	119	14.82%
Parent or guardian of a child(ren) directly affected by the proposed changes	416	51.81%
Parent or guardian of a child(ren) not directly affected by the proposed changes	153	19.05%
Teacher in one of Brighton & Hove schools	55	6.85%
Governor at one of Brighton & Hove schools, please give detail below	18	2.24%
Representative of a voluntary or community group, please give details below	0	0.00%
Other, please give details below	31	3.86%
Not Answered	11	1.37%

- 3.35 Responses to the general question about whether respondents agree or disagree that the council should reduce the overall number of surplus school places in the city was answered by 799 people and showed that 488 responses (61%) strongly disagree or tend to disagree compared to 231 responses (29%) who strongly agree or tend to agree. Table 2 below shows the breakdown of responses to this question.
- 3.36 Some comments to this question supported the reduction but responses were mostly in relation to the proposals for individual schools. Comments included support from parents for smaller class sizes, autonomy for schools to decide their own PAN and that more spaces in the city gives parents greater choice. There was also concern that the proposals go too far and remove too many school places as there is perceived uncertainty about future demand.

**Table 2**

Option - that the council should reduce the OVERALL number of surplus school spaces in the city?	Total	Percent
Strongly agree	63	7.85%
Tend to agree	168	20.92%
Neither agree nor disagree	61	7.60%
Tend to disagree	107	13.33%
Strongly disagree	381	47.45%
Don't know / not sure	19	2.37%
Not Answered	4	0.50%

- 3.37 A greater number of responses supported avoiding closing a school wherever possible with 797 responses to this question. 621 responses (78%) strongly agree or tend to agree compared to 101 responses (13%) who strongly disagree or tend to disagree. Table 3 below shows the breakdown of responses to this question.
- 3.38 Comments to this question included the benefits that schools have to local communities and the need to have schools within walking distance for parents. There were a small number of comments suggesting undersubscribe schools should be closed rather than reducing the size of popular and oversubscribed schools.

**Table 3**

Option - that the council should try to avoid closing a school wherever possible?	Total	Percent
Strongly agree	454	56.54%
Tend to agree	167	20.80%
Neither agree nor disagree	62	7.72%
Tend to disagree	58	7.22%
Strongly disagree	43	5.35%
Don't know / not sure	13	1.62%
Not Answered	6	0.75%

### Published admission numbers

- 3.39 The consultation responses raised various general comments including why the consultation was being conducted during a pandemic. Accuracy of forecast numbers was questioned as some expect an increase in families moving to Brighton & Hove from London due to changing working patterns and a potential baby boom caused by Covid restrictions and lockdown. The impact on parental preference, potential staff redundancies and the feeling that popular successful schools being proposed to protect less popular schools were regular themes. Many respondents supported the council's approach that larger schools should be reduced rather than smaller schools as the impact would be more manageable for larger schools.

- 3.40 Many responses from parents at all schools praised the education provision, staff dedication and particularly the work of headteachers and questioned why the high quality of education was not taken into account at the schools proposed for a reduced PAN.
- 3.41 On many occasions the council has made it clear that these proposals are in no way a reflection of the quality of education or leadership at the schools recommended to have their PAN reduced.
- 3.42 Responses for a number of schools questioned the impact a reduced PAN would have on the ethnic diversity of pupils at the school. This is considered as part of the Equalities Impact Assessment in Appendix 7 where analysis of existing pupil preferences shows this to have a minimal impact on diversity of most schools.
- 3.43 There is recognition of the view that reducing the published admission number for popular schools can have the implication of reducing the availability of places at these schools for parents in certain areas of the city. However the aim of the council with these proposals is to maintain a constant percentage of surplus places in a range of schools across the city so as pupil numbers further decline children in all communities can continue to access a local school.

### **Balfour Primary School**

- 3.44 There were 715 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 4 below. In total 231 respondents (29%) tended to disagree or strongly disagreed with this proposal compared to 171 respondents (21%) who strongly agreed or tended to agree with this proposal. 401 respondents (50%) didn't offer an opinion or didn't answer the question. There were very few comments provided on this proposal but those provided were in support of a reduction in PAN.

**Table 4**

Option - to reduce the PAN at Balfour	Total	Percent
Strongly agree	90	11.21%
Tend to agree	81	10.09%
Neither agree nor disagree	175	21.79%
Tend to disagree	70	8.72%
Strongly disagree	161	20.05%
Don't know / not sure	138	17.19%
Not Answered	88	10.96%

### **Benfield Primary School**

- 3.45 There were 711 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 5 below. In total 237 respondents (30%) tended to disagree or strongly disagreed with this proposal compared to 93 respondents (12%) who strongly agreed or tended to agree with this proposal. 473 respondents (59%) didn't offer an opinion or didn't answer the question.

**Table 5**

Option - to reduce the PAN at Benfield	Total	Percent
Strongly agree	53	6.60%
Tend to agree	40	4.98%
Neither agree nor disagree	208	25.90%
Tend to disagree	70	8.72%
Strongly disagree	167	20.80%
Don't know / not sure	173	21.54%
Not Answered	92	11.46%

- 3.46 Comments highlighted that the school does not have deficit budget due to being federated with Hangleton Primary School and the potential effect of the proposals on the teaching school status. However, teaching schools nationally are being reviewed as is the way that they are funded.
- 3.47 Comments indicated that larger schools can accommodate a reduction in PAN of 30 more easily as Benfield would be reducing size by 50%. The school's PAN would be reducing by 50% however with the current low preference numbers which will be exacerbated by falling numbers needing future school places, the actual number on roll would only reduce marginally.
- 3.48 Comments suggested that the proposal would reduce parental choice as this is the only two form of entry secular school in this area and concern that a reduction at Benfield has been proposed again after similar proposal were not take forward two years ago. It should be noted that parents do not get a choice of school but can express a preference. The aim of the proposals by reducing the PAN at a number of schools is to maintain a constant percentage of surplus spaces in the city year on year. Consequently, as pupil numbers decrease this should allow parents a similar opportunity to secure a place at a school of preference.
- 3.49 Representations made on behalf of the governing body indicate that they strongly oppose any reduction in the school's PAN and should the proposal goes ahead it is highly likely there will be an objection made to the Schools Adjudicator.

### Brunswick Primary School

- 3.50 There were 713 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 6 below. In total 249 respondents (31%) tended to disagree or strongly disagreed with this proposal compared to 116 respondents (14%) who strongly agreed or tended to agree with this proposal. 438 respondents (55%) didn't offer an opinion or didn't answer the question.

**Table 6**

Option- to reduce the PAN at Brunswick	Total	Percent
Strongly agree	68	8.47%
Tend to agree	48	5.98%

Neither agree nor disagree	197	24.53%
Tend to disagree	60	7.47%
Strongly disagree	189	23.54%
Don't know / not sure	151	18.80%
Not Answered	90	11.21%

- 3.51 The comments questioned the rational for reducing PAN at popular schools when there are less popular schools in the same planning area, that the proposal will have impact on pupils already attending the school due to a reduced budget and that the school has been historically oversubscribed.
- 3.52 Brunswick is a popular school that has been oversubscribed in previous years drawing pupils from a large area beyond the planning area. Pupil forecasts indicate a need to reduce the number of places in this planning area but options are limited. West Hove infant school is already reducing PAN in September 2021 and Goldstone Primary is included in the proposals to reduce PAN in 2022. The remaining schools in this planning area are own admission authority schools where the council cannot set the PAN.
- 3.53 Forecast numbers indicate 9 surplus places in September 2022 for this planning area if both proposals go ahead, 33 surplus places in September 2023 and 66 surplus places in September 2024. Analysis of past parental preference indicates that an average loss of 33 pupils who live in this planning area but attend schools in other areas each year which would suggest the potential number of surplus places in September 2022 to be closer to 42 places.
- 3.54 The governing body are opposed to the proposed outcome that Brunswick Primary is reclassified as a three form entry school from September 2022.

### Downs Infant School

- 3.55 There were 730 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 7 below. In total 388 respondents (48%) tended to disagree or strongly disagreed with this proposal compared to 102 respondents (13%) who strongly agreed or tended to agree with this proposal. 313 respondents (39%) didn't offer an opinion or didn't answer the question.

**Table 7**

Option- to reduce the PAN at Downs	Total	Percent
Strongly agree	63	7.85%
Tend to agree	39	4.86%
Neither agree nor disagree	131	16.31%
Tend to disagree	52	6.48%
Strongly disagree	336	41.84%
Don't know / not sure	109	13.57%
Not Answered	73	9.09%

- 3.56 Comments indicated that Downs Infant is a popular school that is currently oversubscribed and the future impact on the linked Junior school in 3 years' time

needs to be considered. They identify the benefits of current school size which enables the delivery of a high level of education was raised and that reducing the intake would deprive 30 pupils of the high quality education provided at Downs Infant School and that reducing PAN will consequently narrow the cut off distance and as a result the ethnic diversity of the school.

- 3.57 Comments suggest that sibling make up large number of applications each year so reducing PAN will mean fewer places available for children living in the surrounding area. While siblings make a high proportion of applications for a number of schools, as a reduced PAN works its way through the school, the number of pupils with a sibling link applying will naturally reduce.
- 3.58 Responses to the consultation were provided on behalf of both the infant and linked junior school governing bodies raising concerns that the proposal could deprive pupils a place at the school who want to attend and would have an impact on the diversity of pupils able to attend. They highlight the financial implications of the proposals and potential impact on SEN provision. Some respondents accepted that action needs to be taken by the council to reduce the number of surplus places in the city but not at Downs Infant school.
- 3.59 Pupil forecasts indicate a significant number of surplus places in this planning area and all three and four form entry schools in this area have been identified to reduce PAN which includes Stanford Infant and Balfour Primary. If the proposals for all three of these schools go ahead there will still be 60 surplus places in this planning area in September 2022, 102 surplus place in September 2023 and 110 surplus places in September 2024.
- 3.60 Downs Infant is a popular school that has been oversubscribed in previous years drawing pupils from a large area beyond the planning area. As pupil numbers in the planning area reduce it will be possible for parents to secure a place at this school from further and further afield. It is recognised that reducing the PAN at Downs Infant will potentially deprive some parents living further from the school the opportunity to send their children to this school. This must be balanced against the need to support local schools in other communities from being forced to close due to falling numbers on roll.

### **Goldstone Primary School**

- 3.61 There were 710 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 8 below. In total 359 respondents (45%) tended to disagree or strongly disagreed with this proposal compared to 97 respondents (12%) who strongly agreed or tended to agree with this proposal. 455 respondents (57%) didn't offer an opinion or didn't answer the question.

**Table 8**

Option- to reduce the PAN at Goldstone	Total	Percent
Strongly agree	58	7.22%
Tend to agree	39	4.86%
Neither agree nor disagree	192	23.91%
Tend to disagree	62	7.72%

Strongly disagree	189	23.54%
Don't know / not sure	170	21.17%
Not Answered	93	11.58%

- 3.62 Comments questioned the amount of surplus capacity for parental preference and in-year movement if all proposals take place which is why the proposals aim to maintain between 5-10% surplus capacity in the city.
- 3.63 Comments identified that the pupil forecast is based upon specific planning areas but the school draws pupils from outside this area and is skewed by the geographical location of the school at the edge of the planning area. While pupil places are planned using specific planning areas it is recognised and accounted for that due to parental preference and location of schools there is movement of pupils across planning area boundaries.
- 3.64 Concern was raised by respondents about the impact on nursery class and ability for school to raise additional income for holiday schemes, school clubs and breakfast club if the proposal went ahead. Concerns were also raised about the potential impact on school's culture, the ethnic and socio-economic diversity of pupils able to attend as is a popular school which is historically oversubscribed.

### **Moulsecoomb Primary School**

- 3.65 There were 706 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 9 below. In total 216 respondents (27%) tended to disagree or strongly disagreed with this proposal compared to 94 respondents (12%) who strongly agreed or tended to agree with this proposal. 493 respondents (61%) didn't offer an opinion or didn't answer the question.

**Table 9**

Option- to reduce the PAN at Moulsecoomb	Total	Percent
Strongly agree	49	6.10%
Tend to agree	45	5.60%
Neither agree nor disagree	218	27.15%
Tend to disagree	72	8.97%
Strongly disagree	144	17.93%
Don't know / not sure	178	22.17%
Not Answered	97	12.08%

- 3.66 There were very few comments provided on this proposal but those given were in support of a reduction in PAN due to the positive effect on other local school that are not currently oversubscribed. The school continues to be subject to an Academy Order and its future status remains unclear. However, at this time it remains a community school and its admission authority is the council.

### **Stanford Infant School**

- 3.67 There were 733 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 10 below. In total

390 respondents (49%) tended to disagree or strongly disagreed with this proposal compared to 86 respondents (11%) who strongly agreed or tended to agree with this proposal. 327 respondents (41%) didn't offer an opinion or didn't answer the question.

**Table 10**

Option- to reduce the PAN at Stanford	Total	Percent
Strongly agree	49	6.10%
Tend to agree	37	4.61%
Neither agree nor disagree	149	18.56%
Tend to disagree	58	7.22%
Strongly disagree	332	41.34%
Don't know / not sure	108	13.45%
Not Answered	70	8.72%

- 3.68 Comments suggested that there are currently areas in the city where access to a local primary school is difficult and the proposals will make this worse, schools need to be within walking distance of pupils' homes. While these comments were intended to show support the schools existing PAN they also add weight to the general aim of the proposals to keep schools open so that families living in all communities will have access to a local school.
- 3.69 Other comments indicated that a high number of siblings apply each year so reducing PAN will mean only a small number of pupils from the local area are able to secure a place. While siblings make a high proportion of applications for a number of schools, as a reduced PAN works its way through the school, the number of pupils with a sibling link applying will naturally reduce.
- 3.70 Responses also identified that Stanford Infant school is smaller than Downs Infants therefore a reduction in PAN would have a greater effect on this school. That it is a popular school historically oversubscribed and by removing 30 places from this school would deprive 30 children of its Ofsted rated, outstanding education. Comments were made about the future impact on linked junior school and that there is a lack of secular school places within walking distance if both changes to Stanford and Brunswick Primary school go ahead.
- 3.71 It was suggested by a number of respondents that schools with older buildings will have larger running costs so a reduced budget resulting from a lower PAN will affect these schools more. The council recognises that any school with a reduced PAN would have excess accommodation needing to be maintained but this could also be utilised by schools in different ways. Approximately 80% of a schools funding is spent on staffing and all schools maintaining excess accommodation would be expected to set budgets accordingly.
- 3.72 A representation was provided by the headteacher on behalf of the staff at the school highlighting what they feel would be far reaching consequences of reducing the PAN such as the financial impact on the school and existing pupils, the impact of reorganisation on staff and that the school has not been significantly undersubscribed in previous years.

## **West Blatchington Primary School**

- 3.73 There were 724 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 11 below. In total 301 respondents (37%) tended to disagree or strongly disagreed with this proposal compared to 80 respondents (10%) who strongly agreed or tended to agree with this proposal. 422 respondents (53%) didn't offer an opinion or didn't answer the question.

**Table 11**

Option - to reduce the PAN at West Blatchington	Total	Percent
Strongly agree	49	6.10%
Tend to agree	31	3.86%
Neither agree nor disagree	191	23.79%
Tend to disagree	59	7.35%
Strongly disagree	242	30.14%
Don't know / not sure	152	18.93%
Not Answered	79	9.84%

- 3.74 Comments on this proposal highlighted that the school has the only primary Autistic Spectrum Condition (ASC) unit in the city. Reducing PAN will be disadvantaging pupils in this unit by reducing the opportunity for these pupils to successfully integrate into mainstream classes. The school is a new, purpose built, 2 form entry school with great facilities and it would be better to reduce the PAN at schools with older buildings and less facilities.
- 3.75 Responses highlighted that the school has had an increase in applications this year and that ASC pupils attend from across the city and often have siblings also wanting to attend so these proposal could result in local pupils not being able to attend. However, consideration of the forecast numbers and past parental preferences supports the view that with a reduced PAN the school will still be able to accommodate all pupils living in the local area who require a place at this school.
- 3.76 Concerns were raised that a large percentage of pupils with EHCP and a reduced budget would disproportionately affect the SEND support offer however the ASC provision and funding would be unaffected by these proposals.
- 3.77 The potential impact on the nursery if the proposal goes forward was also raised. Although no priority is given to pupils attending nursery provision, uptake of these places could be affected if parents felt it was unlikely to secure a reception place.
- 3.78 Representations made on behalf of the governing body indicate that they strongly oppose any reduction in the schools' PAN and should the proposal goes ahead it is highly likely that there will be an objection made to the Schools Adjudicator.

## **Hove Park School**

- 3.79 There were 702 responses to this part of the proposal through the consultation portal and a summary of the responses are provided in Table 12 below. In total

237 respondents (30%) tended to disagree or strongly disagreed with this proposal compared to 94 respondents (12%) who strongly agreed or tended to agree with this proposal. 472 respondents (59%) didn't offer an opinion or didn't answer the question.

**Table 12**

Option- to reduce the PAN at Hove Park	Total	Percent
Strongly agree	53	6.60%
Tend to agree	41	5.11%
Neither agree nor disagree	203	25.28%
Tend to disagree	68	8.47%
Strongly disagree	169	21.05%
Don't know / not sure	168	20.92%
Not Answered	101	12.58%

- 3.80 There were few comments provided in relation to this proposal but they include concern that reducing PAN will reduce parental choice, affect the proportion of SEND children attending and that the number of places being removed is too high given the unknown effect of new housing developments in Hove.
- 3.81 The final consultation question asked respondents if there are other schools where a reduction in PAN should be considered, 308 respondents answered this question. Many responses identified particular schools for further consideration and themes were identified such as only reducing larger schools, suggestions that no schools should have their PAN changed or that all schools in the city reduce PAN equally. Other responses suggested that only unpopular undersubscribed school should be considered, and that church aided schools should be considered as well as community schools.

### **Secondary school admission arrangements**

- 3.82 66 responses were provided to this part of the consultation with the majority supporting no change to the current arrangements. A small number of individual points were made regarding possible changes to the oversubscription criteria and tie break however these do not indicate a need to amend the proposals and therefore it is recommended that no change is made to the secondary school admission arrangements.
- 3.83 In previous years both Brighton Aldridge Community Academy and Portslade Aldridge Community Academy have shared the council's admission arrangements however the Aldridge Education Multi-Academy Trust are consulting on amending the admission arrangements for these schools in 2022-23.

### **Infant & Primary school admission arrangements**

- 3.84 60 responses were provided to this part of the consultation with the majority supporting no change to the current arrangements. A small number of individual points were made regarding possible changes to the oversubscription criteria such as introducing a distance limit for sibling priority and a new priority for pupil

premium children. These responses do not indicate a need to amend the proposals and therefore it is recommended that no change is made to the Infant & Primary school admission arrangements.

### **The co-ordinated admission schemes for 2022/23**

- 3.85 Only 20 responses were received regarding this matter. The majority of responses were not specifically relevant to the schemes and where individual points were made regarding the co-ordinated scheme these do not indicate a need to amend the proposals and therefore it is recommended that no change is made to these schemes.

### **The ‘relevant area’ for consultation**

- 3.86 53 responses were received regarding this element of the consultation. The majority of the responses were not specifically related to the ‘relevant area’ which is the area which the Local Authority uses when consulting on admissions arrangements. It is currently defined as the area within the Brighton and Hove city boundaries and no change was proposed to the relevant area for September 2022. It is recommended that no change is made to the ‘relevant area’ as currently stated.

## **4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS**

- 4.1 The Council only consulted upon the proposal to reduce the PAN of nine schools. Any additional changes in this report would not have been considered as part of a public consultation and therefore the views of the community on those alterations would not be known. Under the School Admission Code this must be undertaken following a consultation with the governing body. 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.
- 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 high level of parental preferences it places more schools at risk of financial difficulty.
- 4.3 Once admission arrangements have been determined by the Council it is possible to seek agreement from the Schools Adjudicator for a variation to the PAN of schools with effect from September 2022 after notifying all other admission authorities within the relevant area. This needs to follow a major change in circumstances.

## **5. COMMUNITY ENGAGEMENT & CONSULTATION**

- 5.1 The Council scrutinised the Voluntary Aided (VA) Schools and Free Schools' proposed admission arrangements for 2022/23. VA schools are required to consult their religious authority (in this case the Diocesan Authority) before consulting others. The Council will review the final document published by the Governing Bodies before deciding whether it should comment or act further.

- 5.2 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.
- 5.3 Two virtual public meetings, one during the day and one in the early evening were facilitated for each school where there is a proposed reduction in PAN. These were conducted through Microsoft Teams. There was a range of attendance from no parents at some events up to 50 participants at others.
- 5.4 The consultation started on 5 October 2020 and closed on 27 November 2020. Information about the consultation and links to the virtual public meetings was available on the council's website [www.brighton-hove.gov.uk/SchoolAdmissionsConsultation](http://www.brighton-hove.gov.uk/SchoolAdmissionsConsultation). Background information and frequently asked questions were provided and updated throughout the consultation period.
- 5.5 Responses could be provided to the consultation through the council's consultation portal <https://consultations.brighton-hove.gov.uk> or by email to the school admission team. Notes of any themes raised at the public meetings were recorded and there was the opportunity for parents to provide a verbal response to the consultation by telephone.
- 5.6 During the consultation period an update of the GP registration data was received and revised forecasts provided (appendix 6) including the first indication of places needed for September 2024.
- 5.7 Additional information was published on the council's website during the consultation such as analysis of the accuracy of the pupil forecast. This shows that for pupils starting school in the last two years the forecast is 99% accurate when looking one year in advance, greater than 98% accurate two years in advance and around 97% accurate three years in advance.
- 5.8 An Equalities Impact Assessment was conducted to ensure that the consultation was conducted to ensure that groups with protected characteristics were included. Responses from the consultation portal show that only just over a hundred respondents (approx. 13%) completed the equalities monitoring questions from which it is difficult to draw any conclusions. Feedback from the Ethnic Minority Achievement Service (EMAS) 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 due to the uncertainty of the housing situations so children may have to move schools anyway and a 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.

## **6. CONCLUSION**

- 6.1 The projected number of children requiring a school place in Brighton & Hove is falling in the coming years, which is leading to an increase in surplus school places across the city. If a school's PAN is significantly higher than the number of

places allocated, then it could generate a financial pressure on the school. This would lead to staffing changes and a need to review the diversity and opportunities of curriculum delivery together with less funding to maintain the school's accommodation.

- 6.2 After admission arrangements are determined a variation can only be revised by detailing the "major change in circumstances" to the Schools Adjudicator and obtaining their approval.
- 6.3 Updated pupil forecast based upon November 2020 GP data confirm the expected trend of reducing pupil numbers over the next 4 years however the numbers expected have changed for some planning areas for September 2022.
- 6.4 The council is required to manage the availability of school places in the city and with pupil numbers falling there is a demonstrable need to reduce the number of surplus places in the city. The aim of these proposals is to support the whole family of schools with the commitment to avoid closing schools and preserving the physical accommodation for future need which has to be balanced against the impact on individual schools some of which may not yet have been directly affected by a significant drop in pupils on roll.
- 6.5 After consultation on proposals to reduce the Published Admission Number it is recommended that the committee agree to a change to the Published Admission Number (PAN) for the following 9 schools:
  - Balfour Primary School from 120 to 90 pupils
  - Benfield Primary School from 60 to 30 pupils
  - Brunswick Primary School from 120 to 90 pupils
  - Downs Infant School from 120 to 90 pupils
  - Goldstone Primary School from 90 to 60 pupils
  - Moulsecoomb Primary School from 60 to 30 pupils
  - Stanford Infant School from 90 to 60 pupils
  - West Blatchington Primary School from 60 to 30 pupils
  - Hove Park School from 300 to 180 pupils

## 7. FINANCIAL & OTHER IMPLICATIONS:

### Financial Implications:

- 7.1 Pupil numbers are the most significant component in determining individual schools' budgets. The proposal to decrease the PAN for a number of schools is intended to reduce the number of surplus school places to safeguard and indirectly benefit the wider provision across the city. Without this proposal there is a possibility that some schools become financially unviable due to low pupil numbers.
- 7.2 For the schools where reductions in PANs are proposed there will be direct implications and the need to plan future years' budgets to reflect lower pupil numbers and the consequent impact on budget allocations.

*Finance Officer Consulted: Steve Williams*

*Date: 07/12/20*

### Legal Implications:

- 7.3 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.
- 7.4 Where changes such as a decrease in the PAN are proposed to admission arrangements the admission authority must first publicly consult on those proposed arrangements. The School Admissions Code 2014 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 2021.
- 7.5 Community schools have the right to object to the Schools Adjudicator if the PAN set for them is lower than they would wish.
- 7.6 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 1999 requires LA's to consult on these proposals every two years.

*Lawyer Consulted: Serena Kynaston Date: 21.12.2020*

Equalities Implications:

- 7.7 An Equality Impact Assessment has been carried out on the proposals being recommended to the committee. The assessment can be found at Appendix 7 and the results have been incorporated into the content of the report.
- 7.8 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.
- 7.9 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.
- 7.10 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.
- 7.11 It is recognised that to foster strong community cohesion school's intake should seek to reflect the city's diversity.

Sustainability Implications:

- 7.12 There are no sustainability implications as a result of the proposals in this report.

7.13 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.

7.14 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

7.15 Any change in PAN is expected to require the school's travel plan to be re-written to take account of the change.

7.16 In relation to Hove Park School many secondary aged pupils will either use public transport or make their own way to school. As a school that often has surplus places on allocation students from further away in the city are often allocated a place there. This will reduce should the school's PAN be reduced.

7.17 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.

Any Other Significant Implications:

7.18 None

**SUPPORTING DOCUMENTATION**

**Appendices:**

1. Proposed Published Admission Numbers for Primary and Secondary schools.
2. Proposed Admission arrangements and priorities for community primary and secondary schools
3. Proposed Coordinated scheme of admissions – primary.
4. Proposed Coordinated scheme of admissions – secondary.
5. Proposed Coordinated scheme of admissions – in year arrangements
6. Primary school pupil projections by planning areas
7. Equalities Impact Assessment

**Documents in Members' Rooms**

Consultation responses

**Background Documents**

None

