



Office of
the Schools
Adjudicator

Local Authority Report
To
The Schools Adjudicator
From

Kent Local Authority

30 June 2017

Report Cleared by (Name & Title): Keith Abbott

Director of Education, Planning and Access

Date submitted: 30 June 2017

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Introduction

Section 88P of the School Standards and Framework Act 1998 (the Act) requires every local authority to make an annual report to the adjudicator. The Chief Schools Adjudicator (CA) then includes a summary of these reports in her annual report to the Secretary for State for Education. The School Admissions Code (the Code) sets out the requirements for reports by local authorities in paragraph 6. Paragraph 3.23 specifies what must be included as a minimum in the report to the adjudicator and makes provision for the local authority to include any other issues. The report **must** be returned to the Office of the Schools Adjudicator by **30 June 2017**.

The questions have been revised for 2017 with the purpose of:

- a) making the information gathered statistically robust and as useful as possible to the local authorities which provide the information; that is: the Office of the Schools Adjudicator (OSA) which receives the information; the Department for Education (DfE) to which the CA provides her annual report; and the children and families for whom the Code is designed to make sure that places are allocated and offered in an open and fair way;
- b) minimising the work required by local authorities in providing information; and
- c) avoiding duplication of effort.

This revised format therefore, in addition to statutory requirements as described in the Code, explores: points raised by local authorities in previous reports and matters which have arisen in the CA's Annual Report and areas of interest to the DfE. If information is already collected elsewhere, such as the number and type of schools and data relating to appeals, then it is not asked for again here but will be available for inclusion in the CA's Annual Report.

Information requested

1. Looked after children and previously looked after children

It is a requirement of the Code that there is information in the local authority's annual report about how admission arrangements in the area of the local authority serve the interests of looked after children and previously looked after children.

- a. How well do admission arrangements in your local authority area serve the interests of looked after children?

☐ Not at all ☐ Not well ☐ Well ☒ Very well

- b. How well do the admission arrangements in other local authority areas serve the interests of your looked after children?

☐ Not at all ☐ Not well ☐ Well ☒ Very well

- c. How well do admission arrangements in your local authority area serve the interests of previously looked after children?

☐ Not at all ☐ Not well ☐ Well ☒ Very well

Numbers of Children in Care (CIC) placed in Kent by other Local Authorities continue to rise; it is concerning that the needs of many of those placed are not being met through specialist provision and it is the expectation of other Local Authorities (OLAs) that Kent LA and its schools will fund and manage strategies for CIC placed here who demonstrate extreme behaviours.

It is incomprehensible that Children & Young People (CYP) with a history of CSE continue to be placed in Thanet & Swale, despite being moved from their home authority because of the risk of CSE. Thanet is renowned as a locality which has disproportionate levels of Gang & CSE activity, hosting a Multi-Agency Task Force put in place to try to address this most challenging of situations. This situation in isolation carries critical safeguarding consequences for those residing in the locality and this is exacerbated by the placing of the most vulnerable and susceptible young people in residential and foster placements nearby. As the risk is being managed and addressed by the Task Force, the activity of gangs and CSE is spreading to Shepway and Swale. OLAs refuse to acknowledge the risk to their own CYP and other young people when requesting school places. The corporate parents in these placing authorities are failing in their duties and putting children at avoidable risk. During this academic year cases have escalated to police involvement, sadly involving other vulnerable children.

The level of need of the CYP placed in Kent by other local authorities continues to be of concern, placing untenable pressures on agencies and Kent schools. Statutory DFE guidance for 'Promoting the Education of Looked after Children' is not a considered factor in placement decisions for the majority of Children in Care placed in Kent. It is more and more apparent that education decisions are made by placing authorities within the confines of financial restraints and not in the best interests of the CYP. Most approaches to schools come after the children have already been relocated, only for the placing LA's to learn that often there is not the specialist provision available that is required to meet the child's needs.

Education provision rarely forms part of the care package or plan and it is common for placing authorities to knowingly place CYP with high needs into mainstream schools without additional resources being offered, resulting in a breakdown of trust and schools being reluctant to admit any children in care from other local authorities. Whilst Kent will continue to challenge schools who do not comply with the School Admissions Code, this adds an additional and unnecessary layer of pressure and fragments relationships with schools and Academies and the LA.

Kent facilitates requests for school places for all CIC both Kent & OLA for places in Kent schools by assigning senior officers to support the process. Some schools have been resistant to admit and in some cases provide strong evidence to support the rationale of this decision. This has resulted in OLA's writing to Academies to advise they will seek a direction from the Secretary of State. In some circumstances KCC has robustly defended the position of the academies concerned as the admission is entirely inappropriate and the OSA/ESFA have agreed, refusing to uphold the direction. Where a refusal to admit is questionable KCC will challenge the school on a local level and support the placing authority through to the admission of the CYP, including via direction if necessary. More must be done to ensure placing LAs are accountable for the cost of specialist interventions these vulnerable children need.

Kent has received Court instructions on a number of cases where the placing authority has procrastinated over the admission process and in some cases not identified any particular school. It is not appropriate that any school will do, it should and must be an

informed choice made by the corporate parent in conjunction with the professionals involved, whilst taking into account the voice of the child. More must be done to restrict inappropriate placements. Presently there is a financial incentive to try to get vulnerable children into mainstream school because they then become liable for the significant cost of specialist support. Changes need to be made which enable these costs to be recovered from the placing LAs even after they are placed on roll to ensure inclusive schools are not crippled by the burden of expensive essential interventions for vulnerable learners.

There are large numbers of residential homes in Kent and many of these provide education provision on site. Kent has recruited an Out of Area Placement Officer whose role is to ensure that placing authorities follow procedure regarding informing Kent of the arrival of the young person and providing a risk assessment. This officer liaises with Kent Police, Fair Access and Foster agencies and Residential homes promoting a collaborative approach to newly arrived children in care.

By way of context, it should also be noted that Kent has some individual secondary schools which currently have in excess of 40 CiC on their school roll.

Co-ordination

The admission arrangements of all Kent schools correctly allocate highest priority to children in care and children previously in care. While the School Admission Code allows the exception, Kent continues to question why some Faith schools continue to provide lower priority for CiC who cannot provide evidence to support baptism or church attendance. Thankfully, this rarely results in a CiC failing to secure a place at a preferred school, however, this remains an unusual limitation given the clear intention of the Code to increase support for these children.

2. Children with disabilities and children with special educational needs

It is a requirement of the Code that there is information in the local authority's annual report about how admission arrangements in the area of the local authority serve the interests of children with children with disabilities and children with special educational needs.

- a. How well served are children who have disabilities and/or special educational needs who have an education health and care plan or a statement of special educational needs that names a school?

☐ Not at all ☐ Not well ☐ Well ☒ Very well

- b. How well served are children who have disabilities and/or special educational needs who do not have an education health and care plan or a statement of special educational needs?

☐ Not at all ☐ Not well ☒ Well ☐ Very well

Please give examples of good or bad practice or difficulties which support your answer and provide any suggestions for improvement.

There have been no significant issues in placing children with disabilities in mainstream schools. Most cases involve the child having a EHCP or a statement of SEN, which affords them priority and allows a school to admit over number if they are named on the EHCP or statement. For disabled children without EHCP or SEN the admissions oversubscription criteria for the vast majority of schools in Kent afford some priority to children or parents on Health and Special Access grounds. Own admission authority schools retain the right to assess children against this priority to their own standards, which may have a higher threshold than those set for KCC schools, however, anecdotal evidence suggests that most are open to supporting children where a clear need is demonstrated.

Following National Offer Day, KCC regularly receives enquires from a small number of own admission authority schools, usually smaller rural Primary schools, that have received a child with more complex needs that the school does not feel they can support. In these circumstances, schools request that the offer be withdrawn. KCC robustly challenges all requests of this type and directs schools to the appropriate resources to allow them to make sufficient adjustments to support these children and fulfil their statutory obligations. The fact that KCC is aware of this practice does suggest that the possibility remains that some schools may successfully dissuade parents from taking up their rightfully offered place unbeknown to KCC.

3. Consultation

Paragraph 1.44 of the Code states who needs to be consulted if consultation on admission arrangements is required. The CA has noted that these requirements are not always fulfilled in the arrangements which come to the attention of the OSA and, in particular, consultation with parents is not always as full as it should be. The OSA therefore wishes to get a better understanding of the wider situation and provide examples of good practice.

- a. When did the local authority last consult on its arrangements?

Please provide the year.

KCC consulted on new arrangements for a number of individual schools in November 2016 for 2018 intake arrangements. Changes in arrangements were required to add Pupil Premium priority to Kent Grammar schools and to mitigate some local developments for other schools.

Each year, KCC consults on changes to individual school arrangements to manage specific issues that have arisen in previous admission rounds, or as a result of planned development.

KCC held a consultation for all Community and Voluntary Controlled schools in November 2013 for 2015 intake, fulfilling its responsibility to consult for all schools at least every seven years.

- b. Please describe the means by which the local authority consulted with parents. Highlight all those means used:
- ☒ Committee paper on the local authority's proposals on admissions on the council's website.
 - ☒ Consultation paper designed for parents on the local authority's proposals on admissions on council's website.
 - ☒ Request to all schools to provide information on the local authority's consultation on its admission arrangements to parents and providing support to make this possible such as posters, leaflets and links to the relevant information on council's website for the schools' newsletters.
 - ☒ Request to all early years settings to make information on the local authority's consultation available to parents by providing support to make this possible such as posters, leaflets and links to the relevant information on the council's website for the settings' newsletters.
 - ☐ Social media (please provide some detail).
 - ☒ Adverts in local press.
 - ☐ Articles in local press.
 - ☐ Posters in supermarkets, doctors' surgeries, early years health centres and similar
 - ☐ Other (please specify)

How confident are you that other admission authorities in your area are consulting parents properly as required by paragraph 1.44a of the Code?	Not at all confident	Many concerns	Few concerns	Completely confident
c. Voluntary aided			X	
d. Foundation			X	
e. Academy			X	
f. Free			X	
g. UTC			X	
h. Studio	N/A	N/A	N/A	N/A
<p>Please give examples of good practice by schools that are their own admission authority. Examples of good practice in consulting with parents whose children are under compulsory school age will be particularly welcome.</p> <p>Following the support outlined above, most schools follow Kent's example and hold thorough consultations, including sending information to parents of children who are under compulsory school age.</p> <p>While KCC and other LAs have the example of many adjudications to understand what is considered to be a poor consultation, there is no definitive document that we are aware of that suggests what is considered an appropriate level of effort when consulting. It may be helpful if drawing on experiences from across the country, future guidance from the DfE would provide a model process it would consider best practice.</p>				

It has been the experience of KCC and a number of schools that there is general apathy in regard to the consultations or at least a recognition that schools should serve their local communities first and foremost and distance therefore is a sensible discriminator so feedback is limited.

4. Pupil, service and early years pupil premiums

Has your local authority consulted for admissions in 2018 on using any of the pupil premiums as an oversubscription criterion in community or voluntary controlled schools?	For entry to reception year	For entry to year 7
a. Pupil premium	No	Yes
b. Service premium	No	No
c. Early years premium	No	N/A

- d. If the local authority consulted on any of the pupil premiums please provide a summary of the responses received:

KCC contacted all Community and VC schools in preparation of the 2017 intake consultations to ascertain an understanding of the interest of our schools to add these priorities. School responses made clear that there was minimal interest in its inclusion, with the majority of responses indicating that they felt it would simply restrict access for local pupils. KCC has always held the view that first and foremost schools should form the hub of their local community. Whilst there may be some merit in creating a position where a child from a poorer background could be given preferential treatment, it must be understood that such a provisions mean that a child could be prevented from accessing their local school simply because it is a working family in marginally better financial circumstances and this is not popular with the public.

Concerns were also raised that unless this was reciprocated by all own admission authority schools in the area, it could result in a disproportionate percentage of this cohort securing a place at a KCC school. This priority has been available to academies for many years and very few appear to have chosen to make use of it. It is Kent's understanding that this is a similar scenario in many other LAs.

As there was little interest from our schools, a general policy was not proposed, however, one Kent Grammar school did request that this priority was added to their criteria. By a small margin, the majority of respondents were in favour of the proposal, however those that did raise objection did so on the basis that they felt a Grammar school should offer children on academic ability only and that this created new disadvantage. The school in question is not super selective, so academic ability was not the deciding factor before these arrangements were proposed. Arrangements were implemented with some small changes to enable the fair application of the school's priority zone.

In the following year, a KCC select committee was created to investigate how Kent Grammar schools supported the most disadvantaged in our County. A proposal from the committee resulted in a 2018 intake consultation for the remaining two KCC Grammar schools to add pupil premium priority. The vast majority of respondents to these consultations were against the proposals but overall numbers responding was very low as a proportion of the cohort. In addition to the objections highlighted above, objections also highlighted that the Code does little

to support families who narrowly miss Pupil Premium eligibility, but who were no less disadvantaged by their social and domestic environment. Despite the opposition from responding consultees, KCC determined to include the pupil premium priority for its grammar schools recognising that numbers were small and many will not have responded because they were content with the proposals.

- e. If you did not consult on introducing the **pupil premium** please indicate up to three main reasons for not doing so:

- ☐ Unsure how it will help social mobility;
- ☐ Unsure how it will reduce educational inequality;
- ☐ Could displace children living locally to a school;
- ☐ Potential transport cost to local authority for local children displaced;
- ☐ Some very disadvantaged families do not apply for free school meals and so would be further disadvantaged;
- ☐ Feel community needs already well met;
- ☐ Would introduce unnecessary complication;
- ☐ Lack of capacity; or

- i. ☐ Other (please explain):

- f. If you did not consult on introducing the **service premium** please indicate up to three main reason for not doing so:

- ☐ Unsure how it will help social mobility;
- ☐ Unsure how it will reduce educational inequality;
- ☒ Could displace children living locally to a school;
- ☒ Potential transport cost to local authority for local children who might be prevented from being offered a place at their local school;
- ☐ Would introduce unnecessary complication;
- ☐ Lack of capacity; or
- ☒ Other (please explain):

Schools that are found in areas of Kent with high numbers of military families often have arrangements that support service premium children. Where lower numbers of service families are present, schools prefer a distance based criteria, local circumstances should therefore factor in this as opposed to a blanket approach.

- g. If you did not consult on introducing **early years premium** please indicate up to three main reasons for not doing so:

- ☒ Application of early years' pupil premium priority for those attending a nursery at the school could unfairly disadvantage those who did not choose to use the nursery at the school;
- ☐ Application of early years' pupil premium priority for those attending a nursery at the school could affect the sustainability of other early years' provision;
- ☐ Unsure how it will help social mobility;

- ☐ Unsure how it will reduce educational inequality;
☒ Could displace children living locally to a school;
☐ Potential transport cost to local authority for local children who might be prevented from being offered a place at their local school;
☐ Some very disadvantaged families do not apply for free school meals and so would be further disadvantaged;
☐ Feel community needs already well met;
☐ Would introduce unnecessary complication;
☐ Lack of capacity; or
☐ Other (please explain):

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How many community or voluntary controlled schools in the local authority area will use pupil premium as an oversubscription criterion for admissions in 2018?	Primary including middle deemed primary	Secondary including middle deemed secondary
h. Pupil premium	0	3
i. Service premium	0	0
j. Early years pupil premium	0	N/A

How many own admission authority schools consulted you on the use of a pupil premium oversubscription criterion for admissions in 2018?	Primary including middle deemed primary			Secondary including middle deemed secondary	
	Early years	Pupil	Service	Pupil	Service
k. Voluntary aided	0	0	1	1	0
l. Foundation	0	0	0	1	0
m. Academy	0	0	0	7	2
n. Free	0	0	0	0	0
o. UTC	N/A	N/A	N/A	0	0
p. Studio	N/A	N/A	N/A	N/A	N/A

How many own admission authority schools in your area will use one of the premiums as an oversubscription criterion for 2018?	Primary including middle deemed primary			Secondary including middle deemed secondary	
	Early years	Pupil	Service	Pupil	Service
q. Voluntary aided	0	0	3	1	0
r. Foundation	0	0	1	2	0
s. Academy	0	1	0	13	3
t. Free	0	0	0	0	0
u. UTC	N/A	N/A	N/A	0	0
v. Studio	N/A	N/A	N/A	N/A	N/A

w. Do you have any further comments with regards to the pupil premiums in addition to the above?

5. Determined arrangements

The OSA has noted that some admission authorities have not determined their arrangements as required by the Code and so seeks further information on this. Paragraph 3.2 of the Code requires local authorities to refer admission arrangements determined by other admission authorities to the Schools Adjudicator if they are of the view that they are unlawful.

- a. On which date did your local authority determine its arrangements for admissions in 2018?

28 February 2017

- b. When were the determined arrangements published on the local authority's website?

<http://www.kent.gov.uk/education-and-children/schools/school-places/admissions-criteria/admissions-criteria-201819>

How many sets of admission arrangements of schools that are their own admission authority were queried directly by your local authority because they were considered not to comply with the Code?	Primary including middle deemed primary	Secondary including middle deemed secondary
c. Voluntary aided	5	1
d. Foundation	0	0
e. Academy	3	4
f. Free	0	0
g. UTC	0	0
h. Studio	N/A	0
<p>i. Overall, in your consideration of the admission arrangements for 2018 determined by other admission authorities, which paragraphs of the Code gave you greatest concern because of possible non-compliance with requirements?</p> <p>No one area stands out as the greatest concern. Some schools have struggled to understand the responsibilities that application outside the normal point of entry (2.17) have placed on them, particularly Secondary schools. While all schools now have this in their arrangements, they are not necessarily following their own processes when requests have been made. Schools are being supported to better understand this relatively new requirement.</p> <p>Beyond this most misbehaviour on the part of schools relate to them wishing to offer places to children that aren't the highest eligible, or refuse to offer places to those that are. KCC would not consider this an issue with their published arrangements, but rather in their application of those arrangements.</p>		

- j. Further comment: please provide any examples or views regarding the determination of admission arrangements that have not been covered above

As the Adjudicator has highlighted in her report on previous years' returns, many admission arrangements include issues that suggest that admission authorities are not aware of their responsibilities in relation to consultation and determination of arrangements. KCC shares the view that this is an area of concern that remains a probable issue in Kent in spite of the effort that KCC expends in monitoring it.

As schools transition from Community or Voluntary Controlled status to become Academies, it is understood that this area of the Code is likely to be less well understood. Similarly, schools that have been their own admission authority for an extended period of time can lose a significant amount of knowledge in this area with a single loss of a staff member. As such, KCC provides yearly admission briefing sessions for all schools that include a section on consultation and determination responsibilities. To supplement this, guidance notices are provided on KCC's internal school knowledge base that details both the determination and consultation processes and an over view of what key features all admission arrangements are required to include (eg PAN Over subscription criteria, process for application outside the normal point of entry etc). Regular reminder emails are sent to all own admission authority schools in the lead up to and throughout the consultation window. KCC also offers to support any school in the preparation of their consultation documents, which significantly reduces the need for objections to be raised at a later date. KCC then monitors all consultations that we are made aware of and compares all determined arrangements to the version that is held for the previous year to monitor changes that have not been consulted on.

One might expect that, with this level of effort, all Kent own admission authority schools have excellent, lawful admissions arrangements; unfortunately this is not always the case. In worst case scenarios, Head Teachers make changes on their websites without having any regard to the code, seemingly unaware this is not possible. One experience of this came from a newly appointed Head Teacher to an academy who had always had his admissions managed by the LA at his previous school so was oblivious to the rules associated with change and thought it was within his gift.

KCC has in excess of 200 own admission authority schools, making the task of simply collecting new arrangements each year a challenge. Some schools required 6 or more contacts this year before arrangements were presented following determination, in spite of the work that is highlighted above. Checking each of these documents against the previously held version is an immense challenge and presents the real possibility that small changes can be missed. As the adjudicator is aware, small changes in arrangements can easily impact on which child will be offered a place in the school.

Once these checks have been complete, a further risk arises. This year, KCC has been made aware of cases where schools have presented arrangements having followed the proper process, but the school has subsequently made an amendment without informing the LA. In one case, a school had an addition set of oversubscription criteria for their sixth form that had not been shared with the LA and had not been published anywhere. Other cases have seen schools present the LA with one set of arrangements, only to have an alternative set on their school website.

These cases have been highlighted where parents or the LA have noticed arrangements on a school's website differ from the version on our own, or where a child has failed to secure a place at a school and analysis shows different criteria has been used.

KCC has subsequently ensured in all cases that the correct determined arrangements were used and where disadvantage had been created, the necessary children were given additional offers. It does highlight, however, that the risk is not removed just because the Code's initial requirements have been adhered to. Large LAs are unlikely to have the necessary resources to continually monitor arrangements posted on school websites for the complete academic year, in case schools make unlawful changes.

Another challenge relates to the interpretation of arrangements that have been set. KCC monitors own admission authority ranking to ensure children are not ranked incorrectly.

It is unlikely that any LA can confidently state that all arrangements in their area are appropriate and free from issue at all times because schools control their own websites. There is not an obvious solution to this issue, but more work could be done to remind Head Teachers/Trusts etc. on their admissions responsibilities, perhaps requiring a governor to be responsible for admissions returns to the LA and OSA alike.

6. Co-ordination

How well did co-ordination of the main admissions round work?	Not well	A large number of small problems or a major problem	Well with few small problems	Very well
a. Reception				X
b. Year 7				X
c. Other relevant years of entry (please specify) KCC has one Year 9 entry school and one UTC with Year 10 entry				X
d. Please give examples to illustrate your answer:				
<p>Kent has raised concerns in previous reports in relation to the competition model coupled with changes to schools funding which has led to instability and uncertainty over school viability. This is the first year in the last four where Kent LA has not found itself in a position of having to manage a school closure during the middle of an admissions round. This has resulted in a much more straight forward admissions process this year, but continued uncertainty about schools opening and delays due to the ESFA failing to deliver projects on time creates significant ongoing concerns for the future. The outcome of the ESFA wave 11-12 process leaves Kent very concerned about whether the places needed in the schools will be there for 2018 and 2019 and KCC wrote to the Secretary of State about this at the end of February 2017.</p> <p>Kent has also reached agreement with all opening Free schools that it is in the best interested of all parties if they remain outside of co-ordination for the first year. This has protected Kent again as one of the proposed schools failed to open. Had they been in co-ordination, this would have created significant upset amongst applicants and reduced our ability to ensure an offer for all. While Kent is fortunate that we could secure this agreement, allowing Free schools to be the arbiter of this decision does put LAs at risk of being forced to include free schools in co-ordination against their wishes. While the DfE have suggested in guidance</p>				

that Kent's approach is in line with best practice, it may be prudent to solidify this in future revisions of the Code and remove any doubt.

Kent would repeat its concerns regarding the timing of Primary Offer day and the difficulties this can create with Easter, but these points have been well made before.

Beyond this, Kent had the usual issues that all LAs face during a normal admissions year, however, our well-developed processes and strong support from the vast majority of schools has resulted in a very straightforward co-ordinated admission year.

- e. There has been an increase in the number of schools for which the governing body or academy trust is the admission authority. Please describe the effect of this on the admissions system in your area.

While Kent has highlighted issues that own admissions authority schools can create in other areas of the business, their impact on the co-ordinated process is minimal. Due to the mandatory centralised approach of co-ordination, KCC can monitor activity much more closely and ensure compliance. Historically, own admissions authority schools could control co-ordinated in year admissions by simply refusing to share information. LAs were given few options to combat this approach, which ultimately led to Kent's position on returning the process to schools.

In co-ordinated main round admissions, schools have to return data to agreed timescales, or they would have no intake the following year.

This allows Kent to monitor ranked lists as they are returned which in turn allows officers to highlight any areas where children may have been given incorrect priority before offers are ever made. The LA is aware of exactly who has been offered which school up until the point appeals have been made/heard, and consequently we can closely monitor schools to ensure offers are not incorrectly withdrawn. It would be of assistance to LAs if own admission authority schools were legally required to inform the LA of the outcome of all appeals, this would also enable the completion of data in their reports to be easily compiled.

To how many schools of each type does the local authority delegate responsibility for in-year admissions?	Primary including middle deemed primary	Secondary including middle deemed secondary
f. Community	149	4
g. Voluntary controlled	84	1
<p>h. What do you consider to be the advantages and disadvantages of this?</p> <p>i.</p> <p>In Year admissions are not coordinated by Kent LA, which, when processed correctly reduces the time frame for families being offered a school place in their local area. Schools hold their own waiting list and are able to inform parents of the outcome of their application immediately.</p> <p>However in areas of Kent where there are limited spaces available due to new housing developments, families contact the LA directly and are offered assistance in securing a school place. Where the nearest school with a space is not within a reasonable distance, LA officers work collaboratively with schools to secure school places through the Fair Access</p>		

Protocol.

The disadvantage of delegating responsibility to schools, is that the LA cannot be assured schools are responding to parents in line with the requirements of the School Admissions Code (2014). There are occasions where it is apparent that applications have not been processed appropriately and forms are not returned to the LA advising of the outcome of the application for a school place. Whilst the process is documented in our scheme, cases have been brought to the attention of the LA where applications have not been processed and the parent has not been informed of their right of appeal. Where these instances are identified they are followed up by the Fair Access team.

It should be noted that not all Academies work collaboratively with the LA and are increasingly resistant to enrolling pupils with attendance issues or a history of challenging behaviour. The concern about pupils being off-rolled to home educate or simply seeking to move schools for a fresh start being denied admissions warrants a change in stance on this policy area. Historically KCC has delegated authority to its schools for admission decisions and this has reduced bureaucracy and enabled children to quickly secure education where there are vacancies. The coordination of in-year in the past caused significant difficulties due to poor response rates from schools when trying to establish if places could be offered. On balance KCC is of the view that with the greater shift to academy status and school autonomy, the need to coordinate In Year Admissions would be in the best interest of children and families because the issues caused by schools failing to act in accordance with procedures outweighs the negative aspects of the delays that were caused by processing. It is also significant that technology and admissions related software has however significantly moved on so that the ICT infrastructure is better able to manage the volumes that were previously an issue for large local authorities seeking to manage this.

For how many schools of each type does the local authority co-ordinate in-year admissions?	Primary including middle deemed primary	Secondary including middle deemed secondary
j. Voluntary aided	0	0
k. Foundation	0	0
l. Academy	0	0
m. Free	0	0
n. UTC	N/A	0
o. Studio	N/A	0
<p>p. What do you consider to be the advantages and disadvantages of this?</p> <p>Historically this was not a major concern, however with the increase of Academies in Kent and the LA being the admissions authorities for fewer schools, there are evident advantages to the LA co-ordinating In Year Admissions.</p> <p>In the main, schools process applications quickly, reducing the time scale for pupils moving into the area being without a school place. However there are some schools, who verbally advise parents they are full, denying parents their right to submit a formal application and receive the right of appeal. This practice is not only unlawful, but it may leave vulnerable children without a school place and unknown to the Local Authority who may not otherwise be aware of their existence.</p> <p>As KCC do not co-ordinate admissions it is reliant on Schools and Academies to update them with current roll numbers on a regular basis. In some cases this information is not</p>		

forthcoming and out of date by the time the LA receive Census data. This results in the LA being unable to provide accurate information to parents who move into Kent or wish to move schools.

Schools and Academies known not to process in Year Casual Admission Forms (IYCAF's) in accordance with the School Admissions Code:

Ashford

John Wallis Academy Primary(CofE Academy) - reminded of the In Year Admissions procedure and as they do not update Kent County Council with their roll numbers, offer places that are not included in the roll numbers data.

Swale Area

Sunny Bank, delaying processing IYCAF's whilst they have spaces, apparently they are reluctant to admit children for whom this is not their nearest school.

Gravesend Area

There have been a number of issues reported to KCC Admissions with regard to Copperfield Academy and there is evidence to show that two separate families who applied to the school in January 17, had not by the end of March been informed of the outcome of their application, despite places being available in the relevant year group. KCC Admissions have reported the issues to the Academy Trust. The LA was advised that the academy has been through a period of instability at the moment with a number of staff changes. A new Head teacher is now in post and will work with the Local Authority to ensure correct casual admission procedures are adhered to. The Local Authority will continue to monitor the academy practices in terms of admissions, but it demonstrates the problems officers have in ensuring families are supported.

Maidstone & Malling

St Augustine's Academy - not processing in Year Casual Admission Forms (IYCAF), as they have re-arranged their class sizes and the teaching groups are now full, although technically a full form of entry smaller than when that year group PAN was determined at normal point of entry. So while they have spaces they advise parents they have no capacity.

Parents contacting Fair Access to advise they have not had their appeal heard and no opportunity to appeal the decision .

Parents complete an IYCAF and the child can still be out of education 2/3 months following the application being submitted

IYCAF going missing within the school so parents having to re complete the IYCAF

A copy of a letter was forwarded to the LA from a parent , showing that the school were refusing admission stating poor attendance for the reason. No right of appeal offered.

The Lenham School – Valley Invicta Academy Trust (VIAT)

There is evidence that following its recent conversion to Academy status that the school is advising parents of CYP presenting with challenging behaviours or attendance issues to apply directly to Ashford schools if they live in the Ashford District and those schools have vacancies.

The Lenham school - VIAT – parents have advised Kent that the school have not been processing all IYCAF nor are they responding to requests formally and offering the right of appeal .

Cornwallis Academy – (Future Schools Trust) A high number of families leave to Electively Home Educate (EHE) however the Academy do re-admit learners and work with the families when the LA finds no education is taking place.

Primary Leigh Academy Chain Maidstone -Not following the IYCAF process in regard to the applications being processed in the order they are received, an element of selecting pupils, high level of movement due to the high level of new housing in the district

Tonbridge & Tunbridge Wells District

Mascalls Academy – (Leigh Academy Trust) A high number of cases go to EHE however they always re-admit and work with the families once taken to IYFA panel

High Weald Academy - (Brook Learning Trust) not processing in Year Casual Admission Forms (IYCAF), as they have arranged their class sizes and the teaching groups are full . So while they have spaces they advise parents they have no capacity.

Skinner's Kent Academy – not processing the IYCAF and not returning the form to LA but placing pupils on a waiting list as the year group is full and not offering the right of appeal. The LA are unaware of pupils seeking a school place within the district, because the school are consistently failing to adhere to the In Year scheme and process set out to safeguard children.

The following Academies are still refusing to process admissions, even though they are not full in some yeargroups :

Knole Academy, Brockhill Park Academy, Ebbsfleet Academy (Brook Learning Trust), Meopham School (Swale Academy Trust), St Augustine Academy, Folkestone Academy, The Lenham School (VIAT), Valley Park (VIAT), Hartsdown Academy (Coastal Academies Trust) and Royal Harbour Academy (Maintained School).

Kent County Council have advised families moving into the area to still apply to these schools with the In Year Admissions form and if they do not receive a response within the suggested five school days, submit an appeal to the Chair of the Governors.

This list does not provide the entire picture; these schools and Academies only come to light where parents contact the LA. There are undoubtedly schools who do not follow the process, however the applicants are picked up by other local schools with spaces and do not come to the attention of LA and therefore are not recorded.

The level of concern is such now that KCC would prefer to see the re-introduction of a legislative requirement for Local Authorities to coordinate in-year admissions on behalf of all maintained schools.

7. Appeals

Information on the number of appeals lodged and the proportion upheld is collected separately so this information is not requested again. The information requested below is to add to that information.

	a. How many schools of each type engage the local authority to provide all aspects of the	b. How many schools of each type engage the local authority to provide some aspects of the
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	appeals process?		appeals process?	
	Primary including middle deemed primary	Secondary including middle deemed secondary	Primary including middle deemed primary	Secondary including middle deemed secondary
Voluntary aided	24	0	24	0
Foundation	3	6	3	6
Academy	33	25	33	25
Free	0	0	0	0
Studio	N/A	N/A	N/A	N/A
UTC	N/A	0	N/A	0
c. Any comments related to this:				

d. How confident are you that admission appeals for schools which are their own admission authorities meet the requirements of the School Admission Appeals Code?

☐ Not at all confident ☐ many doubts ☒ a few doubts ☐ Very confident

e. Please describe your areas of concern, if any:

f.

Kent County Council's Appeals team have received several complaints from parents regarding a self-employed independent person working on behalf of several Academy Schools to provide an admissions appeals clerking service.

The LA has been advised that parents had been contacted prior to their appeal by the hired clerk and told that the appeal was unlikely to be successful and that they should withdraw. They had been informed that other schools were more appropriate for the child.

KCC also received reports from parents that during the appeal hearing the hired clerk was influencing the panel by making a number of comments to them and it was felt that she was making the decision on whether a place should be allocated or not coercing the panel to reach a particular conclusion.

The LA are also advised that the person providing this clerking service holds appeals over long time frames and parents can be left for months awaiting their decision letters.

Parents have been advised to contact the ESFA to make a formal complaint about the person in question but this clearly demonstrates the failings in the system and lack of monitoring of quality in regard to appeals undertaken by self-appointed clerking professionals and no quality assurance or monitoring or oversight of where there may be ongoing poor practice.

g. Please provide examples of good practice which have come to your attention:

The LA is less likely to receive information relating to positive appeals experiences. By their very nature, most communication relates to complaints for appellants that are disappointed about the outcome.

8. Fair Access Protocol

- a. Do you have a Fair Access Protocol agreed with the majority of state-funded mainstream schools in your area?

☒ Yes ☐ No

- b. If no, please explain why:

- c. How many children have been admitted or refused admission under the Fair Access Protocol to each type of school in your area?

Type of School	Number of children admitted		Number of children refused admission	
	Primary aged child	Secondary aged child	Primary aged children	Secondary aged children
Community	60	18	0	0
Voluntary controlled	6	0	0	0
Voluntary aided	8	13	0	0
Foundation	4	51	0	0
Academy	54	232	0	2
Free	2	0	0	0
UTC	N/A	0	N/A	0
Studio	N/A	N/A	N/A	N/A

- d. How well do you consider hard to place children are served by the Fair Access Protocol in your area?

☐ Not at all ☐ Not well ☒ Well ☐ Very well

- e. Please explain your answer giving examples of good and bad practice; successes and difficulties as appropriate.

In putting the figures above into context, it is perhaps worth noting that KCC is admissions authority for just 5 of the 98 secondary schools in scope.

Due to the geography of Kent, there are a number of In Year Fair Access Panels (IYFA), held in districts throughout the County. Each panel works from the Kent Protocol, however some will include localised arrangements, which includes holding Managed move meetings while the professional decision makers are around the table. The majority of schools work collaboratively with the LA and identify education provision for the CYP presented.

Panels

Gravesham: The IYFA/ Inclusion Panel (GIFT – Gravesham Inclusion Forum Team) continues to be a good example of collaborative working amongst the secondary schools in the district. It is chaired by the Deputy Head Teacher of St John's Catholic Comprehensive. GIFT considers IYFA requests, managed moves, monitored transfers (as an alternative to permanent exclusion) and observed transfers (where pupils need a fresh start at another school for other reasons than behaviour). All moves are tracked. The secondary schools in the district manage the movement from one school to another quite successfully which avoids parents going through the casual admission route. Requests for support from the PRU either for short term behaviour intervention (maximum of 14 weeks) for KS3 pupils or long term KS4 placements also go via GIFT.

Dartford: The Dartford Inclusion Forum (DIF) has over the last 18 months been attended by their head teachers. There has been a marked improvement over the last year in terms of decisions on school placements for the young people as previously school representatives did not have the autonomy to make decisions. Meetings are now held monthly, rather than every 6 weeks as previously held. This is important as it enables the Local Authority to secure school placements for IYFA pupils within 30 days. There is better collaboration amongst the Dartford secondary schools, with Grammar schools also taking part where appropriate; but there is some concern amongst local schools about the large number of referrals to the panel from one particular local academy and the number of casual admission requests from parents of pupils currently at the same academy to other local schools.

DIF have recently agreed to include Observed Transfers in their Inclusion Policy as per the Gravesham model, which should hopefully lead to fewer casual admission requests.

During the current academic year the LA has referred 17 home educated pupils to either GIFT or DIF seeking for them to return to mainstream, either because pupils expressed their wish to return to school or because the home education team were unable to establish education taking place.

Thanet

The Thanet panel is an excellent model resulting in a constructive forum which forms part of the Head teacher's termly meeting. Attended by Head teachers and representatives from all the secondary schools in the locality, including the PRU, grammar and special schools and Further Education. Schools consider cases carefully and are supportive of each other, all cases presented are allocated education provision. There are high numbers of cases presented at each meeting, many are complex or EAL or requiring support from Health Needs. Updates and tracking feedback from schools is well maintained. The panel have been very proactive in working with year 11 and with KCC Skills and Employability team, in identifying possible NEETs and encouraging and identifying effective routes for their continued education. CME and EHE cases have education identified without delay when presented at panel.

Canterbury

The panel is well attended by the Head Teachers in the locality including the Head of the Alternative Curriculum Provision, the panel receive a small regular number of referrals and each referral is discussed at length and the reason for presenting challenged. Despite this the schools do offer places at the meeting. There is much negotiation around available places at the Inclusion units as these are running full.

KCC policy is to present CYP who have left local schools to EHE, but have no education in place back to the panel. It is expected that that CYP will return to the school roll they were removed from. This is working effectively and places are offered. Tracking is

becoming more prompt and all local schools are now engaging and communicating with the LA and are open to re-admitting the EHE 's that have previously been on their school roll and where parents have failed to provide education.

Swale

All Swale Head Teachers attend the IYFA Swale panel on a monthly basis. The panel considers the referrals and the majority of the discussion and decision-making focusses on the impact of an admission on a school. The emphasis does not appear to be on inclusive practice in schools and there is minimal consideration on child-centred solutions and the best interests of the needs of a child.

The Chair of the Swale IYFA Panel is also the Chair of Governors at the Alternative Curriculum provision known as the Swale Inclusion Service (SIS). He is also a member of the Swale Academies Trust board. The Trust encompasses two Secondary Academies who form part of the Swale IYFA Panel. It would therefore suggest there is a lack of independence that should be rectified however it currently seems to work with the cooperation of all the schools.

The Panel will accept Year 11 referrals; however depending on the timeframe The CYP are generally placed at the KS4 AC provision.

The Swale IYFA Panel follow Kent's protocol of returning CYP to their home school when Electively Home Education pupils return to education either through choice or due to the lack of education prepared by the family.

The Swale IYFA Panel discuss short-term respite places at the SIS AC provisions for pupils who are struggling to manage in mainstream. The children then return to their home school. Directed moves to another school are identified at this meeting for those pupils who are at risk of a Permanent Exclusion.

The Swale IYFA Panel does identify a place to every CYP presented, either at a school or within the alternative curriculum inclusion units. However, there are issues where the CYP are not added to the roll quickly and/or non-attendance reporting to the LA is sporadic.

Dover Ashford & Shepway

Dover IYFA works well, schools are collaborative and respectful of LA and county protocols and will often seek advice from KCC officers re guidance/protocols. All children referred to Dover IYFA always secure education and schools will contact parents to invite them in for meetings within a week of panel decision. Good example of collaboration.

Ashford IYFA works very well and the panel is held up as a model of good practice. The panel regularly track and review all CYP presented to IYFA. Their ethos is one of which is completely focused on what solution is best for the CYP/the individual – this is at the centre of all their decision making.

Shepway IYFA has been fragmented and ineffectual for some time, matters are now at an impasse with a recent request for a direction to Brockhill not being upheld by the ESFA. All local schools continue to attend IYFA, however they are not collaborative and operate in silos – the perception is that each school is protecting themselves and only interested in what is best for their school rather than what is the best school for the individual CYP. KCC continue to try to broker more collaborative working across this area.

Maidstone & Malling

Not all Head teachers attend the Maidstone & Malling IYFA panel and not all schools send a representative. The panel no longer has support from two local schools. There is currently an Independent chairperson. KCC continue to broker collaborative working to keep the inclusive practices on track

The Lenham school (VIAT) is situated between Ashford & Maidstone and serves both districts, following its conversion to Academy status it no longer engages with either panel.

Valley Park (VIAT) - do not send a representative to the IYFA panel nor do they engage with the Managed Moves exclusion prevention process.

St Augustine's attendance with the IYFA Panel is intermittent.

Please note whilst the schools names above do not send a representative to the IYFA panel, they do participate when IYFA decisions result in the naming of their schools.

Tonbridge & Tunbridge Wells

All schools attend the panel meeting and work collaboratively, the meeting is chaired by the Head teacher of the Alternative Curriculum Provision and there is excellent recording of cases and outcomes.

Mascalls Academy (Leigh Academy Trust) - A high number of cases go to EHE however they always readmit cases presented through the IYFA process and work with the families to reengage the CYP.

Primary IYFA across **Kent** works well and IYFA meetings are held on a need basis in order to identify school placements for permanently excluded pupils. The LA keeps records of which schools have admitted "hard to place" pupils in order to ensure a fair distribution of hard to place pupils amongst local schools

9. Directions

How many directions did the local authority make between 31 March 2016 and 31 March 2017 for children in the local authority area?

	Primary aged children (not looked after)	Primary aged looked after children	Secondary aged children (not looked after)	Secondary aged looked after children
a. Voluntary aided	0	0	0	0
b. Foundation	0	0	0	0

c. Please add any comment with regard to strengths or difficulties relating to this.

How many directions did the local authority make between 31 March 2016 and 31 March 2017 for looked after children in another local authority area?

	For primary aged child	For secondary aged child
d. Community	0	0
e. Voluntary controlled	0	0
f. Voluntary aided	0	0
g. Foundation	0	0

h. Please add any comment with regard to strengths or difficulties relating to this.

Children in Care - OLA directions

Barnet directed - Bromstone Primary - Schools adjudicator upheld the schools defence and identified an alternative school.

Havering – Folkestone Academy

Intention to direct

Brent – St Georges

Brighton & Hove Ursuline – CYP was admitted by Sandwich Technology School
Wolverhampton - Ursuline – KCC provided a statement for the family court. A risk assessment meeting was held, where Wolverhampton were informed if they wished to pursue a place they would need to initiate a direction – awaiting a decision from Wolverhampton

Buckinghamshire - King Ethelberts School. Family court have requested the attendance of the Director of KCC Education Department. Bucks have been advised if they wish to pursue a place at the school they will need to initiate the direction.

These are all complex cases and all have been challenged as to the appropriateness of placement and the lack of planning. These all relate to vulnerable CiC being placed in a difficult area.

It is also of great concern that on a number of occasions social workers have presented to the family courts that they have been unable to secure provision for a child – but they have not followed the admission code in securing a place. This invariably leads to a summons in respect of the Director of Education to appear if no school is identified. The courts have not understood it is no longer within the powers afforded to a Director of Education to require an academy to admit a pupil and this must be communicated to the family courts. KCC lawyers have had to be engaged to explain the duty is on the corporate parent to identify the schools on at least 3 occasions this year, each time costing the LA for legal advice because the courts or at least the lawyers acting for the children, do not understand the admissions process and that it is the corporate parent responsible for identifying a school place not the Director of Education in the authority where their preferred school is located. On none of the occasions had they followed the CiC direction process.

How many requests for directions did the local authority make to the EFA between 31 March 2016 and 31 March 2017?

	For primary aged children	For primary aged looked	For secondary aged children	For secondary aged looked
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	(not looked after)	after children	(not looked after)	after children
i. Academy	0	0	2	0
j. Free	0	0	0	0
k. Studio	N/A	N/A	0	0
l. UTC	N/A	N/A	0	0

m. Please add any comment with regard to strengths or difficulties relating to this.

The direction from the LA to Brockhill Park performing Arts College, following an IYFA meeting was not upheld.

Rationale for requesting a direction

No school could be identified at two subsequent IYFA panels. At the 3rd IYFA panel the hosting school chaired as is the Shepway practice and it was agreed with the schools present that the only fair way to proceed was to hold a ballot. Only two schools could be considered as the third school was the excluding school (Folkestone Academy) and the fourth school is in the process of closing (Pent Valley) and only has a Yr 11 cohort.

The decision was made for Brockhill Park Performing Arts College (BPPAC) to admit both CYP, however they would not be expected to attend but instead be placed in ACP by the school. BPPAC refused to admit and referred the case to the SOS. The case of both girls was decided on by the ESFA that it would be disproportionate to place both girls in one school and the girls should be placed fairly, one in Brockhill and one in The Marsh Academy. At the time of writing both schools continue deliberate whether they will admit the pupils and neither are yet on roll.

10. Other matters

Are there any other matters that the local authority would like to raise that have not been covered by the questions above?

Elective Home Education

Kent now has 1942 children & Young People (CYP) registered to Electively Home Educate. Numbers are increasing at an unprecedented rate and the ability to capture this data has been greatly improved following the recent change in pupil registration regulations. Kent captures all 'Off Rolling' data through a Digital Front Door, where schools are required to indicate the reason they have off rolled a pupil. The EHE Support and Advice Officers have been managing assigned caseloads of an average of 400 children. In order to allow officers the capacity to contact, visit and rebuild relationships with historic cases, an additional officer has also been recruited. This is an area of work that is approached very differently by different LAs. Some consider their role to simply log that pupils are home educating and rely on it being the responsibility of parents to educate and others like KCC actively seek to engage home educators and confirm that children are in receipt of education. The efforts of KCC has put into capturing data on home educated learners has resulted in some very concerning statistics. It has also uncovered some shocking practice at some schools off rolling learners to EHE when the families have no means to educate in order to protect their results records and school performance. We hope this will be picked up more readily by Ofsted in the inspection

framework and attached to this report is a more detail analysis of the home educating cohort in Kent.

The Mosaic data collated (Appendix 1- Business intelligence report).presents an alarming picture of families who home educate, far removed from the widely perceived middle class lifestyle choice held by those who campaign for current EHE legislation to remain untouched. This data evidences that of the families in Kent who elect to Home Educate, the majority have had some form of LA intervention, with a large proportion known to Social Services. Mosaic profiling shows that high numbers reside in G category (rural reality) which in real terms is made up of large numbers of Gypsy Roma Traveller (GRT) families, for whom Kent do not hold comprehensive ethnicity data. The next more prominent areas highlighted in this report, are groups M (family basics) and groups O (municipal challenge). The report evidences that more families residing in 'deprived areas' are Home Educating, this is backed up by the data which shows the factors and services that CYP who are registered with Kent to EHE are recorded against are disproportionate to the cohort on school rolls.

1012 new referrals have been received and opened between 1st September 2016 & 31 May 2017, with 879 cases being closed in the same period. Of these closed cases 565 returned to school or alternative curriculum provision was offered.

Kent EHE Support & Advice Officers and the NEET Administrator actively engage with families of those who are in Year 11 to ascertain their onward route. It is clear that those who have been removed from a school roll in year 11 will be unlikely to sit any examinations and therefore remain out of education in year 12 & 13, and will be recorded as NEET. More & more pupils are being encouraged to Home Educate in this most vital period of their education, which begs the question why a parent would remove their CYP from a school roll following many years of education, prior to the exams which will set the foundations of that young person's future career. This academic year to date has seen 140 Year 10 CYP & 137 Year 11 CYP register to home educate. Given this data, it is extremely concerning that the Key stage 4 June Checking Exercise, 'Add back of pupils who leave school' is not being applied by the DFE in all cases; resulting in schools using EHE as an avenue to remove those CYP who are likely to have a negative impact on their exam outcomes and performance measures.

This may be a National issue yet to be fully uncovered but the duty to educate is with the parent and with authorities failing to check whether education is taking place it may become an increasingly wide spread issue. Our records show that despite there being some excellent home educating practice in the county, over 40% of children registered to home educate since September 2016 were known to social services. This raises serious concerns and KCC would welcome the Adjudicator taking a closer look at this off-rolling practice and how it may be undermining the efforts of LA to ensure children are in school.

Schools committing to admissions over Published Admission Number.

KCC experienced a very disturbing situation this year with one of the Academy trusts working within its LA area committing to admit pupils over number then seeking to withdraw from that position. KCC received written confirmation in January this year that Meopham Academy(Swale Academy Trust) wanted to admit an additional form of entry. The LA in good faith made the additional offers through the coordinated admission round and a further 28 children received an offer of a place at the school that would otherwise have been the case had it not expanded.

In June this year, the LA was contacted and advised that the offers would be withdrawn

unless KCC were to provide additional funding for the extra places due to the 'lag' that is created when schools expand but are funded on the previous year's census data, as has been the case for many years. KCC had no budget for such funding and certainly no duty to provide this. None the less the LA was informed that the school would write to these parents to advise the places would be withdrawn and the reason being the LA refused to fund them.

This was no idle threat, the Trust Board claimed they had not given permission to the headteacher for the expansion and it took interventions from colleagues at the DfE and ESFA to prevent the letter being sent although at the time of writing the issue is still not fully resolved. This would have disrupted the entire coordination process were this to be followed through and created significant disadvantage to the children concerned as they would have been denied access to other school places so late in the process that they might have otherwise received.

The situation appears to be have been averted, but KCC raise it to demonstrate the significant vulnerabilities in the system if a particular academy requests such an expansion then finds it is not financially able to deliver on its commitments. There are no checks and balances in this regard as the LA is required to admit over number where a school requests it.

Summer Born:

As this year's report does not include a separate section on Summer born applications, it is our expectation that the point was well made last year. Kent does not intend to repeat the issues that were highlighted in our last return, however, it should be noted that while the current process has broadly settled down there still remain a small number of parents each year that consume significant officer time arguing for their children to be taught out of yeargroup when there is no demonstrable need presented. This issue still presents a significant burden to LAs and a more definitive position from the DfE would be greatly appreciated in any future code.

Thank you for completing this template.

Please return to Lisa Short at OSA.Team@osa.gsi.gov.uk by 30 June 2017