
SUBJECT: Explanatory Note on the Matter of School Admissions Line in Central Services Block (Matter Arising)

DATE: 21st January 2025

RECIPIENT: Schools Forum

SUMMARY:

1. This paper has been written in response to a Request for Review of Delegated School Budget Allocations for Admission Services by a Schools Forum delegate.

It should be read in conjunction with the papers further detailing the use of the Central Schools Service Block (CSSB) and the planned modification of this in line with the proposed Education Services redesign.

2. The request for review has asked to consider the following points:
 - i. Ensure that schools purchasing their own admission services are not unduly disadvantaged.
 - ii. Evaluate whether the funds retained for admission services are being used effectively and transparently.
 - iii. Consider mechanisms to reimburse or reduce the financial contributions of schools that do not rely on centrally provided services.
3. Apologies must be tendered for this length of this paper, however a comprehensive response has been felt the most appropriate to meet Schools Forum's request for more detailed oversight.

A brief overview of the key points in this presentation will be given at the Schools Forum meeting, with an opportunity for questions.

BACKGROUND:

4. As per the regulations issued by the Department for Education (DfE), the budget for School Admissions must be established and approved on its own budget line by Schools Forum, rather than as a contributory commitment or as a merged element of a contribution to committed responsibilities that local authorities hold for all schools; to maintained schools; or de-delegated services from the Schools Block.
5. 'Operation of the system of admissions and appeals' remains a duty that the Local Authority holds for all schools (Schedule 2, Paragraph 9); as does 'writing to parents of year 9 pupils about schools with an atypical age of admission, such as university technical colleges (UTCs) and studio schools, within a reasonable travelling distance' (Schedule 2, Paragraph 23).

6. A number of the services that are covered by funding that is held centrally are subject to a limitation of no new commitments or increases in expenditure from 2024 to 2025. This limit does not apply to School Admissions or the servicing of Schools Forum.
7. As per the DfE conditions: 'Where local authorities hold these duties in relation to all schools, all schools must be treated on an equivalent basis. Local authorities should not treat voluntary aided schools, foundation schools or academies differently from other maintained schools in the services they provide to them. This is set out in the DSG conditions of grant.'

This does not include funding that has been retained centrally from maintained school budgets only, where some statutory duties relate to community and voluntary controlled schools only.

However, in these situations, local authorities should not charge voluntary aided and foundation schools if requested to provide services to these schools and where there is no charge to community and voluntary controlled schools for the same service.'

8. In previous guidance, the DfE have stated: 'Where local authorities hold these duties in relation to all schools, all schools must be treated on an equivalent basis. Local authorities should not treat voluntary aided schools, foundation schools or academies differently from other maintained schools in the services they provide to them. This is set out in the DSG conditions of grant.'

For example, although admissions appeals are not a duty that the local authority holds in relation to all schools, the department would still expect all schools to be treated fairly and equitably by the local authority.'

While this set out clear expectation of the responsibility for School Admissions and appeals that should be held centrally for all schools, this expectation of central responsibility for School Admissions has been further stressed under the current government, as detailed in the Children's Wellbeing and Schools Bill.

The School Admissions budget line in the Central Schools Services Block is not retained centrally from maintained school budgets only, but from all schools. As such, services are provided to all schools and academies.

9. Southampton Schools Forum has maintained the School Admissions budget at 0.422M since at least 2012, where the earliest minutes still available confirmed this as the agreed amount.

Within this figure is 0.055M that is transferred to Southampton City Council Democratic Services for the administration of independent appeals (further details are provided later in this paper).

ADMISSIONS REGULATIONS:

10. The Local Authority retains, by legal requirement, overall responsibility for the coordination of 'mainround' admission, including the processing of applications, making of offers and processing of late applications.
11. As per the Admissions Code, 2021: 'Local authorities are not required to coordinate in-year applications for schools for which they are not the admission authority. They may, however, coordinate in-year applications for any or all own admission authority schools in their area, with the agreement of the relevant admission authorities.'
12. Local authorities must, on request, provide information to prospective parents about the places still available in all schools within their area. To enable them to do this, the admission authorities for all schools in the area must provide the local authority with details of the number of places available at their schools whenever this information is requested, to assist a parent seeking a school place.
13. The Local Authority retains, by legal requirement, the duty to ensure a Fair Access Protocol is in operation. Once this is developed and agreed by a majority of admission authorities, all admission authorities within the Local Authority area are legally required to participate within this.
14. Parents, and in some circumstances children, have the right to appeal against an admission authority's decision to refuse admission. Under section 94 of the School Standards and Framework Act 1998, responsibility for making arrangements for appeals against the refusal of a school place rests with the admission authority of the school. The admission authority and appeal panel must act in accordance with this Code, the School Admissions (Appeal Arrangements) (England) Regulations 2012, the School Admissions Code, other law relating to admissions and relevant human rights and equalities legislation, for example, the Equality Act 2010.

Appeal panels perform a judicial function and must be transparent, accessible, independent, impartial, and operate according to principles of natural justice.

Two or more admission authorities in the same local authority area may make joint arrangements for hearing appeals.
15. A local authority has the power to direct the governing body of a maintained school for which they are not the admission authority to admit a child in their area even when the school is full.
16. A local authority also has the power to direct the admission authority for any maintained school in England (other than a school for which they are the admission authority) to admit a child who is looked after by the local authority, even when the school is full.

17. Where a local authority considers that an Academy will best meet the needs of any child, it can ask the Academy to admit that child but has no power to direct it to do so. The local authority and the Academy will usually come to an agreement, but if the Academy refuses to admit the child, the local authority can ask the Secretary of State to intervene. The Secretary of State has the power under an Academy's Funding Agreement to direct the Academy to admit a child and can seek advice from the Schools Adjudicator in reaching a decision.
18. Section 88P of the School Standards and Framework Act 1998 requires local authorities to make reports to the Schools Adjudicator about such matters connected with relevant school admissions as required by the Code. This includes an assessment of the effectiveness of Fair Access Protocols and co-ordination in their area, how admission arrangements affect the interests of looked after children and previously looked after children, and the number and percentage of lodged and upheld parental appeals.

ADMINISTRATION OF SCHOOL ADMISSIONS IN SOUTHAMPTON

19. It is acknowledged that individuals providing services in relation to school admissions within the Local Authority, schools and trusts may hold differing titles. For the purposes of clarity, throughout this report, the following terminology will be used:

LA Admissions Officer – an officer in Southampton City Council fulfilling the Local Authority School Admissions functions, as well as those functions delegated to the Local Authority by other admissions authorities.

School Administrator – an employee of a school who fulfils either school-held functions, or the School Admissions functions that are retained by schools and/or admissions authorities.

Admissions Consultant – a third-party officer who is delegated to fulfil the school-held School Admissions functions, and/or who is delegated to fulfil the admission authority functions.

20. Within the Southampton City Council boundary, there are 67 mainstream, state-funded schools that fall within this coordination.

The admission authorities for these 67 schools are as follows:

School Type	Admission Authority	Quantity
Academies	Academy Trust	32
Community Schools	Local Authority	5
Foundation Schools	Governing Body	23
Voluntary Aided Schools	Governing Body	4
Voluntary Controlled Schools	Local Authority	3

The 23 foundation schools are organised into 4 trusts.

The majority of the academies are organised into 6 academy trusts, which are a mix of national and local trusts. 4 academies exist as 'standalone' academies.

Of the voluntary aided schools, 3 are of a Roman Catholic denomination and 1 is Church of England.

The 3 voluntary controlled schools are all of Church of England denomination.

21. Of the 67 schools, 25 (37%) make use of Admissions Consultants.

ADMINISTRATION OF SCHOOL ADMISSIONS IN SOUTHAMPTON: MAINROUND ADMISSION

22. As per the legal requirement, Southampton City Council coordinates the mainround admission scheme for admission into normal points of entry. In Southampton, this is:

- Year R, for infant and primary schools.
- Year 3, for junior schools.
- Year 7, for secondary schools.
- Years R and 7, for all-through schools.

23. Prior to the opening of the application window, the Local Authority fulfils the following functions:

- Drafting, reviewing, updating and consulting on admissions policies for all schools who delegate this responsibility. Distributing consultations for all schools, inclusive of those who do not delegate this responsibility.
- Collating all admissions policies for schools within the Southampton City Council boundary into a 'composite prospectus'. This is delivered via dedicated web pages on the Southampton City Council website, but can be provided in print on request. This is a legal requirement.
- Creating the transfer group in the central admissions system, populating this with all known Southampton City Council resident pupils in the relevant year group, liaising with Early Years providers and Health services for the population of the Year R transfer group. This pre-population helps to safeguard against any pupils not being offered a school place should their parent or guardian not make an application for them, and ensures pupils are appropriately tracked.
- Creating an appropriate common application form (CAF) for parents to access that is linked to the central admissions system. This is a legal requirement.

- Creating an appropriate late common application form for parents to access. This is not linked to the central admissions system. This is a legal requirement.
- Working with Early Years settings, primary and secondary schools, alongside work with community groups and the Local Authority Communications Service, to ensure families are able to access and understand the admissions process and make timely, informed applications. This includes:
 - Information sessions at primary schools for Year 6 parents, as well as support in the making of applications
 - LA Admissions Officer support at secondary school open evening/morning events
 - Information sessions for Early Years providers
 - Information sessions at community and faith centres
 - Training to Gateway and other customer-facing services on the process of admissions and application completion
- Previously LA Admissions Officers have written to all parents, making use of print room services, to inform them of the application window opening. In the last year, due to cost pressures, this has been amended to distribution of electronic communications through schools, Early Years settings and social media, with letters manually generated and posted by LA Admissions Officers to those pupils not in an education provision.
- Programming the central admissions system with the appropriate school bases, and programming the relevant admissions criteria for each school.

24. A key aspect of the mainround admissions process is the function of 'matching and validation'. This ensures that applicants are appropriately matched to existing pupil records to ensure appropriate recognition of known information that could have a bearing on the ranking of any application against admissions criteria; as well as verifying information provided on a pupil's application to ensure admissions criteria is correctly applied. The result of the matching and validation process is that correct ranked lists of applicants can be compiled from which offers will be made.

25. While matching and validation is the legal responsibility of the admission authority for a school, LA Admissions Officers fulfil the following steps of this process for all schools, beyond those for which they are the admission authority:

- Matching pupils to existing records to prevent duplication of offers and to ensure appropriate feeder school links can be established
- Using the GIS mapping system to run distance calculations for each school, according to the distance measurement given in their admissions policies
- Checking for siblings on roll at applied-for schools when this is indicated
- Checking Looked After, or Previously Looked After status for pupils where this is indicated and applying this where it is not indicated but is known to the Local Authority
- Checking Child Protection status for pupils where this is indicated

- Providing discretionary application of vulnerable status where this is appropriately evidenced and forms part of the relevant school(s)'s admissions criteria
- In liaison with the SCC SEND Service, ensuring those pupils with EHCPs that will name the school by the National Offer Day are appropriately included in the relevant school's offer number and ensuring any further plans naming the school above number after the National Offer Day are noted and that offers are not made under the relevant school is 'managed back down' under its Published Admission Number (PAN)
- Providing secondary address checks through the Council Tax system, where initial attempts to confirm an address have yielded unsatisfactory results
- Undertaking resolution work where there is disagreement over preferences between parties with parental responsibility (PR) for a pupil

26. As the admission authority for community and voluntary controlled schools, LA Admissions Officers complete the full matching, validation and ranking process for all such schools. They further complete this task for other admission authority schools, such as foundation trust and academy schools, where delegated to do so by that admission authority.

This process includes the steps noted in section 25, but further includes:

- Seeking and reviewing evidence provided and applying any medical/social criteria that applies for relevant school(s) where it is felt the test for this is met
- Seeking and reviewing Supplementary Information Form (SIF) or other religious evidence and applying any denominational criteria that applies for relevant school(s) where the test for this is met
- Confirming staff employment where an applicant is applying under any 'children of staff' criteria
- Seeking and reviewing evidence provided where an applicant is applying under any 'Service Family' criteria
- Seeking evidence of previous or current care status from other Local Authorities where it is suggested an applicant may be a Previously Looked After, or Looked After Child
- Undertaking address checks on the Council Tax system where there are concerns about an address used on an application

Admission authorities who do not delegate these responsibilities to the Local Authority must conduct these steps themselves, either through a School Administrator or Admissions Consultant.

While it is not a rule without exception, generally speaking schools with a religious character who retain this responsibility deliver this function through a School Administrator, Senior Leadership and/or delegates from their Governing Body; while Academy schools deliver this through the use of an Admissions Consultant.

27. For the schools where Southampton City Council are the admissions authority, as well as those who delegate responsibility for the matching, validation and ranking of applicants to Southampton City Council, validation and ranking is completed directly into the central admissions system.

Some schools who make use of an Admissions Consultant or School Administrator for their validation and ranking input this directly into the central admissions system (with the exception of Looked After or Previously Looked After Children and EHCP allocations, which LA Admissions Officers will manually input), while others return this as a ranked list via secure transfer and it is inputted manually by LA Admissions Officers.

28. The breakdown of matching, validation and input of rankings for the 67 mainstream schools within the Local Authority boundary is detailed below:

Number of schools for whom the functions in Point 26 are fulfilled by LA Admissions Officers:	67 100%
Number of schools for whom the functions in Point 27 are fulfilled by LA Admissions Officers:	38 57%
Number of schools for whom the functions in Point 27 are fulfilled by School Administrators and/or Admissions Consultants:	29 43%
Number of schools where rankings are made into the central admissions system by LA Admissions Officers:	38 57%
Number of schools whose School Administrators and/or Admissions Consultants directly input rankings to the central admissions system:	23 34%
Number of schools whose rankings are completed by School Administrators and/or Admissions Consultants but input into the central admissions system manually by LA Admissions Officers:	7 10%

29. The Local Authority will exchange information with other Local Authorities where Southampton City Council residents have applied for schools outside of its boundary, or vice versa.

30. Following the inputting of rankings, the Local Authority will complete the following actions:

- Running the initial offer process. This is an automated process.
- Manually checking and correcting any anomalies following the automated process. This is a manual process.
- Identifying those applicants who have not secured a school offer due to oversubscription of preference schools. This is a manual process.
- Identifying the appropriate alternative school offer for those who have not secured a preference offer. This is a manual process.
- Creating mail merges to generate offer letters for those families who have opted for letter notification. This is a manual process.
- Initiating the portal updates and emails to be delivered on National Offer Day. This is an automated process.

- Printing and mailing offer letters for those families who have opted for letter notification. This is a manual process.
- Completing the DfE Data return on the outcome of the mainround admissions process. This is a mix of automated and manual processes.
- Completing the data return for how schools oversubscribed, and the percentages of met preferences. This is a manual process.

31. Following National Offer Day, all refusals and acceptances of on-time offers, and processes for late applicants, are completed manually by the Local Authority. Details are sent to those schools who complete their own rankings to ensure waiting lists are accurate and up to date to facilitate this process.

The process of mainround admissions, including offers to late applicants and offers from waiting lists following declines of places offers, is administered by the Local Authority until the start of the relevant academic year.

ADMINISTRATION OF SCHOOL ADMISSIONS IN SOUTHAMPTON: IN-YEAR ADMISSIONS

32. Southampton City Council maintains a position where it offers a level of coordination for in-year admissions for all schools, and full coordination for many more than those for which it is the admission authority.

This position is held both to support schools and support families. It ensures the admissions process, which is often confusing to families, is offered as simply as possible to applicants; that the responsibility for tracking and safeguarding unplaced pupils is retained by the Local Authority and not schools; and that high costs of individual systems for processing applications are not incurred by schools, including those who make use of an Admissions Consultant.

33. The Local Authority fulfils the following functions for all schools, through LA Admissions Officers, regardless of admission authority or use of Admissions Consultant:

- Providing a Common Application Form (CAF) that incorporates all admissions policy questions where relevant, without asking for information when it is not relevant to the selected school
- Providing a central admission system for use of all admission authorities and schools
- Matching incoming applicants to existing pupils to ensure appropriate transfer of information, application of relevant admissions criteria and oversight of movement for safeguarding purposes
- Running distance measurements for all applications and schools through the central GIS mapping system
- Applying the appropriate Previously Looked After, Looked After or Child Protection criteria to applications, where relevant
- Seeking and providing information to schools and Admissions Consultants that is relevant to safeguarding and challenging behaviour refusals

- Providing Admissions Consultants with details of preference order to minimise the risk of multiple offers or higher preference offers in quick succession to initial offers
- Providing Admissions Consultants with information when higher preference offers are made to ensure preferences are not needlessly processed
- Maintaining a central database of school PAN, number on roll (NOR) and vacancies, to inform families as needed and to minimise the risk of higher preference offers in quick succession to initial offers or delays to the processing of applications
- Identifying alternative offers where preference schools are unable to offer, to ensure unplaced pupils access school as quickly as possible
- Identifying cases that need to be considered under the Fair Access Protocol, whether due to reintegration to mainstream from PRU or custody, or due to the lack of a school place within a reasonable distance
- Tracking school data and allocations data for use of application of challenging behaviour refusals, appeal, allocation of Looked After or Previously Looked After pupils or application of the Fair Access Protocol
- Seeking and/or delivering legal advice, escalating challenge to advice where necessary, and holding the indemnity for actions taken on this

34. LA Admissions Officers perform the following function for all community and voluntary controlled schools, as well as other schools who delegate these functions to them, including those who may make use of an Admissions Consultant:

- Updating of offer status in the central admissions system
- Making offers of school places
- Issuing refusals of school places, and opening right to appeal

35. Some School Administrators may fulfil some or all of the functions listed in Point 34.

Where schools make use of an Admissions Consultant, they may fulfil some or all of the functions listed in Point 34.

In both cases, there is some level of 'doubling up' inherent in this process where this happens.

For example, if an applicant applies for two schools that include one community school and one academy who make use of an Admissions Consultant, and neither school can offer, the Admissions Consultant will issue a refusal letter that opens right of appeal, LA Admissions Officers will then identify and offer an alternative school place. As part of the offer, they will confirm the decline of an offer at both preference schools and open right of appeal. This means that the parent will have duplicate correspondence about the academy school.

36. LA Admissions Officers fulfil all functions in Point 34 where an allocation is made via the Fair Access Protocol.
37. When making in-year offers, LA Admissions Officers will liaise with School Administrators to ensure vacancy amounts are accurate and whether or not any challenging behaviour refusals will be issued before offering. Where a school employs an Admissions Consultant, the LA Admissions Officers will liaise with the Admissions Consultant, who will liaise with School Administrators.
38. Challenging behaviour refusals, also known as '3.10 refusals' are completed by School Administrators, or other staff, or Admissions Consultants where a school makes use of these.
39. Admissions Consultants have licence agreements to access the central admission system that they are invoiced for. This cost will be included in the rates for services tendered to schools.
40. The breakdown of in-year admissions services tendered for each of the 67 mainstream schools is given below:

Number of schools for whom the functions listed in Point 33 are fulfilled by LA Admissions Officers:	67 100%
Number of schools for whom updating of offer status in the central admissions system is completed by LA Admissions Officers:	42 63%
Number of schools for whom updating of offer status in the central admissions system is completed by School Administrators or Admissions Consultants:	25 37%
Number of schools for whom offer and refusal letters, and right of appeal, are issued exclusively by LA Admissions Officers:	34 51%
Number of schools for whom offer and refusal letters, and right of appeal, are issued by School Administrators or Admissions Consultants (as well as by LA Admissions Officers when covered as a result of other processes as given in the example in Point 35):	32 49%
Number of schools for whom offer and refusal letters, and right of appeal are issued by LA Admissions Officers following use of the Fair Access Protocol:	67 100%

ADMINISTRATION OF SCHOOL ADMISSIONS IN SOUTHAMPTON: INDEPENDENT APPEALS

41. Southampton City Council administers the independent appeal function for all schools and academies, beyond those for which they are the admission authority, through its Democratic Services department. This includes the following functions:
- Organising appeals within the legal timeframe
 - Providing appropriate spaces for appeals to be heard
 - Providing appropriately trained Clerks

- Organising an appropriately trained appeal panel that meets the legal requirements
- Seeking and providing legal advice when necessary
- Providing training for Clerks
- Providing training for appeal panellists
- Providing training for presenting officers, whether this be SCC Admissions Officers or Admissions Consultants

42. LA Admissions Officers will serve as the Presenting Officer for appeals, who present the response to parental appeals, for community and voluntary controlled schools by default, but also provides this service to other admission authority schools where this is delegated to them.

Some schools who make use of an Admissions Consultant will have the Admissions Consultant serve as their Presenting Officer.

43. The Presenting Officer is responsible for preparing the written submission for response to appeal and presenting this at the appeal hearing.

The Presenting Officer should always be a person with an expertise in Admissions and Appeals to answer the technical questions for this process. It is advised that a school representative also attends to provide any detail as to the specific contexts of the school that may be asked of during the hearing, however Presenting Officers will speak to this as much as possible in the absence of a school representative.

Schools often send a Headteacher, member of Senior Leadership, member of staff with responsibility for admissions or a Governor as the school representative.

44. While the duty to prepare and present the case falls to the Presenting Officer, in liaison with the school for relevant school data; where this is an Admissions Consultant, LA Admissions Officers prepare and provide documentation and information to aid with this process.

45. Some schools who make use of an Admissions Consultant for other aspects of their process continue to use LA Admissions Officers as their Presenting Officer, and vice versa.

46. The breakdown of appeals services tendered for each of the 67 mainstream schools is given below:

Number of schools for whom the administration of appeals is provided by the LA Democratic Services Team:	67 100%
Number of schools for whom essential appeal information is provided by LA Admissions Officers:	67 100%
Number of schools for whom LA Admissions Officers serve as Presenting Officers:	42 63%

Number of schools for whom Admissions Consultants serve as Presenting Officers:	25 37%
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SCHOOL ADMISSIONS BUDGET

47. In the request for the review of the School Admissions budget line within the Central School Services Block, it is stated that 'I have been made aware that over 50% of schools within Southampton have opted to procure their own admission services'.

This position is inaccurate, as no school within Southampton operates its own full admission service, as part of mainround or in-year admission. Nor do over 50% employ an Admissions Consultant and/or deliver the majority of their admission services outside of Local Authority coordination and/or delivery.

48. As detailed in the background information at the top of this paper, School Admissions remains a function that must be funded as its own line in the Central School Services Block, and is not subject to a limit of previous spend in its determination by Schools Forum.

49. The earliest available minutes of Schools Forum state a continued agreement of the School Admissions budget line in the Central School Services Block at 0.422M. While this has been reviewed in subsequent years, there has not been a change to the funding amount since this time.

50. LA Admissions Officers provide services to all schools beyond the legal requirements, beyond those who whom the Local Authority is the admissions authority, and inclusive of those schools who make use of an Admissions Consultant.

51. The Local Authority coordinates mainround admissions as per legal requirement, and provides a system of coordination for all schools for in-year admissions.

Where schools retain a desire to complete their own ranking, which may be preferred especially by schools of faith denomination, this can be performed directly by school staff such as School Administrators or Governors, or through use of an Admissions Consultant. It is a requirement that no one person completes such ranking on behalf of the admissions authority.

Where schools retain a desire to issue their own offers and/or refusals, including opening right to appeal, this can be performed directly by school staff such as School Administrators, or through use of an Admissions Consultant. The 'doubling up' of offer and/or refusal, including opening right to appeal, with LA Admissions Officer work is inherent to this process.

LA Admissions Officers complete these tasks for all schools where there has been a need for application of the Fair Access Protocol.

52. The Local Authority administers the independent appeals process for all schools through its Democratic Services department. Inclusive in this offer is training for Admissions Consultants who serve as Presenting Officers.

LA Admissions Officers further provide appeal services for all schools, inclusive of those who make use of Admissions Consultants as Presenting Officers.

Admissions authorities are able to make use of LA Admissions Officers or Admissions Consultants as Presenting Officers and provide school staff to assist at hearings.

53. Since 2012, the demand on the admissions system, especially for in-year admission and appeals, has increased. Snapshot data points are provided below:

	2012 Intake 2012/13 In-Year*	2015 Intake 2014/15 In-Year	2019 Intake 2018/19 In-Year	2022 Intake 2021/22 In-Year	2024 Intake 2023/24 In-Year
Mainround applications (Inf/Pri)	3,834	4,179	3,649	3,316	3,192
Mainround applications (Jun)	1,384	815	888	874	860
Mainround applications (Sec)	2,425	2,764	3,946	4,023	3,436
In-year applications	936	3,198	3,457	4,290	5,285
Appeals lodged	Not held	140	157	174	353

*2012/13 In-Year provided rather than 2011/12 In-Year admission was subject to previous admissions legislation at this time and was no coordinated in the same way by the Local Authority.

There have been 274 appeals lodged in-year for the 2024/25 academic year thus far, before any mainround appeals for 2025 entry are heard or further in-year appeals made.

54. Application of the Fair Access Protocol has increased in recent years. This is due to a mixture of factors including a significant deficit of placement in the secondary phase; emergency response application of the Protocol such as in response to Operation Warm Welcome; and an increasing presentation of challenging behaviour.

The data snapshot of the number of placements via the Fair Access Protocol over recent years is provided below:

	2019/20	2020/21	2021/22	2022/23	2023/24
Primary Allocations	1	0	0	1	3
Secondary Allocations	7	9	25	303	320

55. The services delivered by LA Admissions Officers for all schools are able to be delivered due to the principle of economies of scale that allow for the services for all schools to be absorbed into workstreams of officers alongside the services for schools where the Local Authority is the admissions authority or providing delegated services for another admissions authority.
56. All admissions functions are offered to all schools without additional charge as per the required commitment for funding for School Admissions to be delivered through the Central School Services Block and for the offer of services to non-Local Authority admission authority schools to be equitable.
57. Schools may choose to employ the services of an Admissions Consultant to deliver functions that may be otherwise held by School Administrators or delegated to the Local Authority and delivered through LA Admissions Officer.
58. Schools who employ Admissions Consultants still use the coordination of the Local Authority for mainround and in-year admissions, and have functions fulfilled by the Local Authority.

The function of the Admissions Consultant is to fulfil functions that may otherwise fall to a School Administrator or be delegated back to the Local Authority. In this way, the role of an Admissions Consultant is more comparable to roles that would be held and fulfilled by school staff, rather than LA Admissions Officers (save for Presenting Officer duties), and the engagement of an Admissions Consultant does not necessarily reduce the demand on the LA Admissions service.

An Admissions Consultant does not complete the full admissions functions for a school or admission authority, but works in tandem with school and the Local Authority. It may be useful for comprehension to view this as a 'middle man' arrangement for the majority of services tendered when it comes to mainround and in-year admissions, save for performing as a Presenting Officer.

59. The School Admissions budget line in the Central School Services Block has not increased in at least thirteen years, despite an increased demand to the service, a reduction in the funding provided to the Central School Services Block and general inflation.
60. School admission appeals have increased significantly in volume over the past several years, particularly for in-year admission appeals, which are less able to be pre-emptively planned for in work streams.

To meet this demand, the ask on Democratic Services has increased and additional members of staff have needed to be employed and trained as appeal clerks.

61. The transfer of 0.055M to Democratic Services for appeal functions has not increased, and so there has been a reliance on the use of Local Authority general funds to ensure delivery of services.

In an attempt to ensure cost efficiencies, Democratic Services have invested in a new IT programme called *Appeals Pro* to reduce the logistic and paperwork processing that has previously been completed manually by LA Admissions Officers, Admissions Consultants and LA Democratic Services Officers.

No additional charge is being made to Admissions Consultants for the use of this programme and access to it.

No additional charge has been added to the 0.055M transfer from the School Admissions budget line.

The cost of this programme has been provided through the Local Authority general fund.

62. The service provided by Democratic Services for the administration of the appeals process is currently underfunded by the 0.055M budget allocation, but as there is not available budget to increase this, the service is maintained at an additional cost to the Local Authority general fund.

While this is not in-keeping with the guidance for the Central Schools Services Block, an increased ask has not been made to Schools Forum to increase available funds for appeal services, in recognition of other cost pressures.

63. Appeal panellist expenses are not covered in the 0.055M transfer to Democratic Services, but are instead funded from the remaining School Admissions budget.

Savings have been made to expenses costs, but the volume of appeals means that this cost remains relatively high despite savings.

Removal of panellist expenses has been trialled in neighbouring Local Authorities, however this has reduced panellists willing to sit on panels in these areas and to ensure that panels can be provided, Southampton City Council are not proposing to remove the reimbursement of panellist expenses.

A concerted effort is being made to recruit additional local panellists, both to ensure that panel make-up best represents the local community, and to reduce travel expenses.

64. As a result of the factors above, and in light of pay awards for local government officers, based on the current organisation of the service, there would be a cost pressure for the Admissions Service at its current budget allowance starting in the 2025/26 financial year.

65. To avoid a budget pressure, or an ask of Schools Forum to increase the School Admissions budget line, the School Admissions service is one that has been carefully considered as part of the Education Services redesign.

Formalising existing links and crossover work between School Admissions and functions of the Children Not in School service, there is the proposal to create the Education Access team, where the function of School Admissions would sit, alongside responsibilities for Children Missing Education (CME), initial Elective Home Education (EHE) processing and checking, and part-time timetables (PTT).

66. This service redesign has presumed a continuation of the 0.422M budget line for the function of School Admissions.

Should this budget be reduced, the offer of services to all schools, both those who do and do not employ the services of an Admissions Consultant, would be dramatically reduced, to focus on meeting core statutory requirements.

67. While the exact details of reduction in service would need to be determined based on the budget reduction, below is a summary of the services most likely to be at risk following any budget reduction:

- Policy drafting, consultation and review for all but community and voluntary controlled schools.
- The administration of independent appeals, including the provision of training and delivery of appeal Clerks, panels and Presenting Officers. There would be a need for admission authorities to facilitate appeals through other services, at direct cost to these.
- Foundational coordination of the in-year admissions process, including access to a central admissions system. This would mean that schools would need to fund and administrate their own systems and hold responsibility for pupil tracking.
- Matching incoming applicants to existing pupils to ensure appropriate transfer of information, application of relevant admissions criteria and oversight of movement for safeguarding purposes. This would present a risk to safeguarding and would mean decisions are made without access to relevant contextual information.
- Running distance measurements for all applications and schools through the central GIS mapping system. This would require schools to fund their own appropriately vetted systems.
- Applying the appropriate Previously Looked After, Looked After or Child Protection criteria to applications, where relevant. This would mean that

appropriate ranking and processing of applications may not happen, at risk to the best interests of these pupils.

- Seeking and providing information to schools and Admissions Consultants that is relevant to safeguarding and challenging behaviour refusals. This would present a risk to safeguarding and would mean decisions are made without access to relevant contextual information.
- Providing Admissions Consultants with details of preference order to minimise the risk of multiple offers or higher preference offers in quick succession to initial offers. This would mean that pupils may have several school moves in quick succession or put schools at risk of being underpopulated at School Census.
- Providing Admissions Consultants with information when higher preference offers are made to ensure preferences are not needlessly processed. This would mean that pupils may have several school moves in quick succession or put schools at risk of being underpopulated at School Census, or mean that schools would be needlessly making offers to pupils who no longer require them.
- Maintaining a central database of school PAN, number on roll (NOR) and vacancies, to inform families as needed and to minimise the risk of higher preference offers in quick succession to initial offers or delays to the processing of applications. This would mean that pupils may have several school moves in quick succession or put schools at risk of being underpopulated at School Census, or mean that schools would be needlessly making offers to pupils who no longer require them.
- Mainround validation and ranking of applications for schools where the Local Authority are not the admission authority. This burden would fall to schools to meet.
- Providing appeal data for school census returns. This burden would fall to schools to meet.

68. As the continuation of School Admissions services have been linked with those of Children Not In School services in the Education Services redesign, to avoid an additional budget request of Schools Forum, any reduction to the School Admissions budget line would also see a reduction to Children Not In School services as there is a reliance of economies of scale in their delivery alongside School Admissions functions. This would result in an increased burden to schools for the tracking of pupils and reduced strategic support and guidance for Children Not in School services.

69. To address the reduction in scale of services provided by the Local Authority should the School Admissions budget be reduced, there would need to be an increase in services provided by School Administrators or Admissions Consultants, including the purchase of appropriate systems. Alongside the purchase of systems, schools, Trusts and Admissions Consultants would need to employ additional staff to meet the shortfall of service delivery.

Certain functions, such as the automatic access to relevant centrally-held information, would need to be removed entirely and there would be an

increased risk of mistakes in offers, missed opportunities for challenge to admission, and duplicate offers, or offers in rapid succession that sees multiple moves for pupils in short time periods. Schools would also hold an increased level of responsibility for the safeguarding and tracking of unplaced children as this oversight would no longer be held centrally.

It is likely that the cost to schools to provide these services would exceed the current percentage by school commitment that is committed to the School Admissions budget line.

70. It is also likely that appeal challenge to the Local Government and Social Care Ombudsman (LGSCO), process and offer challenge Secretary of State and/or Schools Adjudicator would increase, creating an additional cost pressure to schools and Trusts.
71. Admission authorities retain the right to issue their own in-year offer and refusals letters, despite that there may be a 'doubling up' of the work where other schools are applied to. This can be completed by School Administrators of Admissions Consultants, however the offer to all schools for this to be delegated to LA Admissions Officers is covered by the current budget allocation.
72. As per the legal requirement, the Local Authority School Admissions service provides the core mainround coordination for 100% of mainstream schools. It further provides delegated validation and ranking services for 57% of mainstream schools, completing manual input for a further 10% of schools.
73. Currently the Local Authority School Admissions service provides core in-year coordination and services for 100% of mainstream schools; provides direct system processing and updates for 63% of schools; and fulfils the offer, refusal and opening of right of appeal for 51% of schools in all cases, with additional provision for some schools who retain this function (due to the nature of this process) and for 100% of schools where the Fair Access Protocol is applied.
74. Currently the Local Authority Democratic Services department provides the administration of independent appeals, including training for third party Admissions Consultants for 100% of mainstream schools.

Local Authority Admissions Officers further provide appropriate information and documentation for 100% of mainstream schools, and serve as Presenting Officer for 63% of mainstream schools.

75. As referenced in Point 55, current services to schools can be offered due to economies of scale for provision delivered to schools who delegate responsibility of functions to the Local Authority.

The services listed in Point 34, which are delivered by LA Admissions Officers to between 51% and 100% of schools in varying degrees, are made available to

all schools by credit of LA Admissions Officers delivering the services in Point 34 and absorbing the functions listed in Point 34 into these work streams.

76. Delivery of the functions listed in Point 33 also allow for an appropriate level of staffing to allow for full mainround and in-year delegated validation and ranking to be undertaken by LA Admissions Officers, which is delivered to 57% of schools, with a further 10% of schools being provided with manual input of rankings by LA Admissions Officers. Further validation and ranking for specific purposes, as outlined in Points 25 and 33, are provided to 100% of schools.

CONCLUSIONS

77. Below follows a response to the three points noted in the request for review of the School Admissions budget line in light of the information provided in this paper.

78. In response to the point: **Ensure that schools purchasing their own admission services are not unduly disadvantaged.**

It is the opinion of the Local Authority that schools who purchase additional admissions services through the use of an Admissions Consultant are not unduly disadvantaged.

The Local Authority School Admissions Service, as funded through the Central School Services Block (CSSB) budget in the Designated Schools Grant (DSG), provides the statutory mainround and in-year admission mechanisms. It further provides additional mainround and in-year services that all schools access, regardless of admission authority, school designation or whether schools make use of an Admissions Consultant.

The work undertaken by Admissions Consultants or School Administrators is able to be delivered in the format it currently is, where schools use these roles for admissions purposes, due to the underpinning of the system provided by the Local Authority admissions service.

No school is required to use School Administrators or Admissions Consultants to deliver any part of their admissions process, however may choose to do so if this is the desire of the Headteacher and/or trust management.

Currently within Southampton, no school provides its own full admissions service and the workstreams of Admissions Consultants work in tandem with the Local Authority, rather than in isolation.

The Local Authority have no objection to schools and/or trusts making use of Admissions Consultants and have the highest respect for the professional skills of those Admissions Consultants currently working in Southampton. Such Admissions Consultants are invited to share in training opportunities with and work alongside LA Admissions Officers.

If there were to be a reduction to the School Admissions budget, then there would be a decline in the services offered to all schools, including schools that currently make use of Admissions Consultants or School Administrators. This would mean that fees charged by Admissions Consultants would increase to meet increased service demands and/or additional School Administrators would need to be employed; and some services provided by the Local Authority would not be able to be completed by School Administrators or Admissions Consultants, so would be removed altogether.

All schools make use of Local Authority admissions services, and have the option to delegate full delivery to the Local Authority without additional charge, should they chose to do so, by credit of how the wholesale offer has been arranged.

The decision to make use of Admissions Consultants may be considered a 'paying twice' charge, however as use of the Local Authority Admissions Service is still being provided, it is not undue disadvantage and remains a preference decision for schools and/or trusts.

As the School Admissions service, and the appeals service as delivered by Democratic Services, are currently underfunded for the services provided, and schools would have to absorb significant additional costs should these services be reduced or removed, no disadvantage in the current funding model is perceived.

79. In response to the point: **Evaluate whether the funds retained for admission services are being used effectively and transparently.**

As detailed in this paper, the budget for School Admissions has remained consistent for at least 13 years, despite an increase in the demands on the service, including appeal services; an increase in the services offered, including the transfer of the responsibility for School Place Planning; reductions to Central School Services Block funding; and general inflation and cost increases.

To ensure efficiencies in the administration of admissions appeals, new IT applications have been purchased outside of the DSG funding for this.

The current cost of the School Admissions service (exclusive of the cost of software licensing, expenses for appeal panellists and officers, and giving the funding for the administrations of appeals at 0.055M, which is an underfunded amount) is 0.456M.

The service is currently underfunded for what is delivered, with some costs absorbed by the Local Authority general fund and with forecasted cost pressures that the service would not be able to resolve in its current structure.

To address the cost pressures without an additional ask on the DSG, School Admissions has been carefully considered as part of the proposed Education Services redesign, to allow for more cohesive work within Local Authority teams and to provide appropriate financial and logistical efficiency.

The proposed allocation of the School Admissions CSSB budget line to the Education Services design is as follows:

- 0.055M transfer to Democratic Services for the administration of independent appeal panels
- 0.114M contribution to the provision of Senior Education Access Officer work (66% of total cost)
- 0.201M contribution to the provision of Education Access Officer work (75% of total cost)
- 0.051M contribution to the provision of Education Access management, inclusive of delivery of the Fair Access Protocol (Team Manager for Education Access, 63.1% of total cost)

We believe that the current use of the School Admissions budget, as well as the proposed application of this to the proposed Education Services redesign is transparent and efficiently managed, with greater efficiencies identified in the proposed redesign to avoid a request for increased funding levels.

80. In response to the point: **Consider mechanisms to reimburse or reduce the financial contributions of schools that do not rely on centrally provided services.**

The services delivered to all schools are currently underfunded by the agreed School Admissions budget.

While some schools may choose to make use of an Admissions Consultant rather than School Administrators or delegation to LA Admissions Officers, these schools still make use of Local Authority coordination and services. Admissions Consultants are unable to operate without the underpinning service delivered by the Local Authority. The delivery of these services rely on the economy of scales through wholesale uptake across Southampton.

If these core coordination and service provisions were to be removed through a reduction in the School Admissions budget, schools and/or trusts would incur significant costs to establish their own systems and services, which would be likely to outstrip the per school contribution to the School Admissions budget for these services through the CCSB. Some services would not be able to be provided outside of a Local Authority model and so would need to be foregone for all schools, as it would not be suitable to deliver to only community and voluntary controlled schools. There would be an increased risk of offers in error, challenge and multiple offers.

Considering the services provided to all schools, inclusive of those who retain some elements of the admissions process to be delivered by School Administrators and/or Admissions Consultants, for which the Local Authority is currently underfunded to provide, it is not felt appropriate that there be an arrangement for schools who do make use of School Administrators and/or Admissions Consultants for elements of the admissions process to be reimbursed or have a reduction in commitment to the School Admissions budget line in the CSSB.

The use of School Administrators and/or Admissions Consultants for elements of the admissions process remains at the discretion of the preference of individual schools/trusts but is not necessitated as such functions can be fulfilled alongside those for which LA Admissions Officers already provide to all schools, inclusive of such schools.

Currently, all mainstream schools within Southampton make use of centrally provided services, inclusive of those who employ the services of an Admissions Consultant.

81. It is hoped that the detail in this paper satisfies the request for review, however the Local Authority remains open to further question and the provision of additional information where this is available and appropriate.

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