

Appendix 3

Appraisal of WISERD recommendations

- **Recommendation 1 (short-term): consider including a statement that says catchment areas may change and that any decision by parents about the purchase or rental of a home based on school catchment areas is taken entirely at their own risk.**

Response: The recommendation is accepted.

The Admission to Schools (Information for Parents) booklet includes an explanation that

“Admission arrangements including school catchment areas are consulted upon annually. When changes to school catchment areas are necessary, these are normally implemented on 1st September at the year of entry”.

Giving greater prominence to a more explicit explanation within the published 2019/20 policy and supporting documentation of how catchment areas are subject to change would provide greater clarity and contribute toward managing parent expectations.

- **Recommendation 2 (short-term): consider removing compelling medical or social grounds as a criterion. Removing this as a criterion would also help reduce the number of oversubscription criteria.**

Response: The recommendation is not accepted.

The WISERD Report noted that:

“Increasingly fewer admissions authorities are using exceptional or compelling grounds as an oversubscription criterion. The inclusion of this as an oversubscription criterion has the potential to give parents ‘false hope’ in what they may think are reasonable grounds for why their son/daughter should be given priority”.

The majority of preferences submitted by parents on the basis of perceived medical or social grounds do not meet the published criterion which requires specific evidence. Implementation of this criterion over years suggests that what constitutes ‘compelling medical or compelling social grounds’ is misunderstood by parents and often difficult to measure objectively. Assessment by a single medical practitioner or social worker recommending attendance at a particular school can be perceived as being subjective without wider context as pupils without a statement of special educational need medical or educational needs may be met at any mainstream school.

This criterion is only met where there are particularly compelling circumstances that have required the level of support provided by a medical consultant or where the child is being supported by Social Services but not classified as a Looked After Child, and the advice provided by these professionals indicates that such needs may only be appropriately met at the preferred school. Such circumstances include, but are not limited to, children with mental health issues, subject to physical or emotional trauma or domestic violence, and those deemed vulnerable in the context of family issues.

The Council recognises that whilst the inclusion of this criterion may be open to interpretation, this criterion enables appropriate weighting to be given to the circumstances of those children who are amongst the most vulnerable in Cardiff. Additional guidance will be considered for inclusion in the Admission to Schools (Information for Parents) booklet to limit the likelihood of misunderstanding.

- **Recommendation 3: consider adding the criterion explicitly giving high priority to applicants with siblings who are living in the designated catchment area.**

Response: The recommendation is accepted.

The existing oversubscription criteria give additional weighting to children with an older sibling on roll in the school. Children who are resident in the catchment area of their preferred school and who also have an older sibling on roll in the school are given priority by means of a sub-criterion over children resident in the catchment area without an older sibling on roll,

The WISERD Report notes that there are a number of logistical, financial and educational of siblings attending the same school. At all ages these may include enabling parents to re-cycle school uniforms, travel arrangements and the easing of childcare arrangements around school times and INSET days.

The inclusion of a sibling criterion ahead of a proximity criterion may prioritise applicants who live further from the school, but as a consequence such a criterion would also deprioritise those children who are the oldest sibling in the family, and those who are only children.

The prioritisation of the admission of a child over others on the basis they have an older sibling in the school already is arguably one that has different logistical implications relative to the age of the child and phase of education i.e. primary or secondary whether they are within the catchment area of a school or are not.

Pupils in primary education below 10 years of age (Year 5) are not encouraged to access school independently for safety reasons and are usually escorted to school. Whilst many schools have breakfast clubs and/or after school childcare, where

children from the same family are required to access more than one primary school this creates logistical challenges for the family.

Pupils in secondary education are in the main expected and encouraged to be able to access school independently. In the event the nearest place available is more than 3 miles from a child's home and/or there is no safe practicable walking route the pupil may be eligible for free transport.

The Council has adopted sustainable transport policies which seek to promote sustainable and non-polluting modes of transport and to reduce unnecessary journeys. Prioritising the admission of secondary age children with siblings attending a school over those who live in closer proximity may be perceived to contradict the aims of this policy. However, in practice, where pupils are placed in different secondary schools as a consequence of parental preference, some parents may escort their children to separate schools and in such circumstances the removal of a sibling criterion would increase the length of journeys undertaken.

- **Recommendation 4: consider editing criteria to simple statements, keeping technical detail to a minimum in the main list of criteria; adding clear definitions elsewhere in the handbook (and avoiding duplicating definitions throughout the handbook); and avoid the use of 'equal priority' criteria.**

Response: The recommendation is accepted.

A balance should be struck between simplified arrangements and clear criteria.

The Council will consult on options that implement this change within the published 2019/20 policy and will direct parents to explanatory information in separate supporting documentation.

- **Recommendation 5 : consider removing criteria 2a, 2b, 7 and 8 from the current list of oversubscription criteria**

Response: The recommendation is accepted.

Criteria 2a and 2b within the oversubscription criteria for admission to secondary education are as follows:

“Where an older sibling was directed by the Council to an alternative school because the alternative school was previously the catchment area school, if the parent desires, the Council will admit younger siblings to the alternative school”

and

“Where an older sibling was directed by the Council to an alternative school because no places were available at the catchment area school, if the parent desires, the Council will admit younger siblings to the alternative school.”

Criteria 2a and 2b are not mentioned in the School Admissions Code, but were implemented by the Council as measures to mitigate the difficulties faced by parents when unable to admit their child to their catchment area school, and to reduce the impact of catchment area changes and/or the outcome of school re organisations.

Few applications were submitted for entry to school in 2017 on the basis of meeting these criteria which may be an indication of the criteria not being sufficiently clear or well understood by parents.

Since these criteria were introduced, there have been a number of developments to the Council’s admissions process as a result of changes to the School Admissions Code, including the ability to submit multiple preferences.

Although some pupils benefit by securing places where they meet either of these criteria, these pupils are prioritised over those children currently resident within the catchment area of a school. This causes resource planning issues for some schools, and there is a cumulative effect for those in-catchment pupils who in turn are unable to attend their catchment area school.

The Council’s Admission to Schools (Information for Parents) booklet includes an explanation that ‘Parents are reminded that living within a catchment area does not guarantee a place in any given school. Catchment areas can also be changed over time. Any decision by parents about the purchase or rental of a home based on school catchment areas is taken entirely at their own risk’. Giving greater prominence to this statement would be of assistance to parents.

Criterion 7, detailed as follows:

“In determining applications for admission in respect of other pupils the Council gives priority to children living furthest away from the alternative school offered by the Council as measured by the shortest practicable walking route as a tie break”

is very rarely required by the Council, only when all criteria met above are matched by two or more pupils. There is no requirement for such a criterion within the School Admissions Code.

The WISERD report states:

“The merit of this criterion within the urban area of Cardiff is not clear and perhaps more difficult to justify. It is also a very complex criterion that is based on various distance measures that any prospective applicant would not be

able to calculate for themselves. This would suggest that this criterion does not fulfil the aims of providing greater transparency and encourage fair access through the publication of oversubscription criteria”.

The improved determination of closest proximity criterion from 2 decimal places to 4 decimal places further decreases the likelihood of this criterion being considered and its inclusion unnecessary.

Criterion 8 refers to the premature admission of children to school. The School Admissions Code states that when considering applications to years other than the normal year of entry, admission authorities will rarely be able to prove ‘prejudice’ as a ground for refusing an additional pupil while the number of pupils in the year group to which entry is sought remains below the admission number for the school, which applied to that year group when it was the normal year for entry into the school.

Premature admission could reasonably be removed from oversubscription criteria as the admission of such pupils would be considered outside of the normal round of admissions.

- **Recommendation 6: consider encouraging the Welsh Government to update its School Admissions Code to provide a justification and rationale for its preferred use of shortest walking distance. This may be helpful for admissions authorities in clarifying their use of this as a tie-break and may limit the opportunity for appeals.**

Response: The recommendation is accepted

Assessing proximity to school using shortest safe walking route is long established in Cardiff and is consistent with the means by which proximity is considered in other Local Authorities in Wales. In England, many authorities assess direct distance (as the crow flies).

Assessing Shortest Safe Walking route utilising GIS routing software is a fair and easily understood criteria and one which is consistent with the assessment used for determining a pupil’s eligibility for free home to school transport.

The Council will request that the Welsh Government provides clarification of the justification and rationale for using this method in any future publication of an Admissions Code.

- **Recommendation 7: consider publishing dates of open days/evenings for all schools in the admissions handbook.**

Response: The recommendation is accepted

The publishing dates of open days/evenings would enable a greater number of parents to visit schools and consider a broader range of information.

The Council will request dates of open days/evenings for all schools in Cardiff, and will include these dates on the Council's website and/ or within the Admission to Schools (Information for Parents) booklet where possible.

The inclusion of this information would provide greater clarity and contribute toward parents' decision making regarding their child's education place.

- **Recommendation 8: consider including a more detailed statement about the admission of children of Service Personnel and other Crown Servants in the admissions handbook.**

Response: The recommendation is accepted

The Admissions Code requires Admissions Authorities to "allocate a school place in advance, if the applicant would meet the criterion when they move to their destination."

Cardiff's Admission to Schools (Information for Parents) booklet includes a statement that "The address of UK Service Personnel will be accepted if their application form is accompanied by an official Ministry of Defence (MoD) letter declaring a definite return date and confirmation of the new address."

The Council will give greater prominence to an explanation of how the admission of children of Service Personnel and other Crown Servants will be administered within the published 2019/20 policy and in supporting documentation.

- **Recommendation 9: consider having an earlier deadline for applications (e.g. 31st October of each year) instead of circa 28th November for secondary school applications and circa 9th January for primary school applications. This would give officers longer to process applications, assess the validity of applications and deal with appeals. The earlier application deadline might also have the additional benefit of discouraging short-term renting of properties nearer popular schools.**

Response: The recommendation is accepted

The Admissions Code specifies that:

"in order to ensure consistency between admission authorities and avoid confusion on the part of parents, all admission authorities in any LA area must have common dates of return for primary applications and secondary applications for the normal year of entry".

In practice, this means that admissions administered by the Council and by schools for which the Council is not the admissions authority (such as faith schools) must align.

The Council will investigate the logistical implications and the potential benefits or otherwise of implementing an earlier deadline.

- **Recommendation 10 (short-term): consider alternative ways to longevity or length of residence for addressing the short-fall in the number of school places available to pupils living in catchment areas**

Response: The recommendation is accepted

Following a period during which there has been a continued increase in the pupil population within Cardiff primary schools, the impact of a corresponding increase in Cardiff secondary schools will be felt in coming years.

An alternative means to addressing the imbalance between the number of school places and the demand for places within a catchment area would be to revise catchment area boundaries.

Consideration of the revision of catchment areas, and establishment of new catchment areas, will be required to provide a better match in size of catchment areas to the school population within.

Any such proposed changes would be informed by any changes to primary and/ or secondary school provision brought forward via the Welsh Government Band B 21st Century Schools programme.

The Band B programme gives consideration to the sufficiency of school places throughout Cardiff and any proposals to revise existing catchment areas would need to be considered in the context of any changes to school capacities agreed. A decision in principle on the Council's submission is expected in late 2017.

- **Recommendation 11 (short-term): consider adding designated feeder schools as an oversubscription criterion (after sibling and catchment criteria).**

Response: The recommendation is partially accepted

Attendance at a linked feeder primary school operated as an oversubscription criterion in Cardiff but was removed from admission arrangements from the 2001/2002 entry year.

Para 2.63 of the School Admissions Code states:

“The use of named feeder primary schools as an oversubscription criterion can allow better continuity for pupils but needs to be used with caution. Admission authorities should ensure that such arrangements do not unduly disadvantage children who move into an area at a late stage and consider carefully the impact that such arrangements have on the ability of a school to serve its immediate local area.”

The attendance of a pupil at a designated feeder school criterion is a clear and easily understood criterion, and there is a benefit of continuity for pupils and for those linked schools in operating this criterion.

The re-introduction of such a criterion in Cardiff may however cause a number of difficulties for parents, particularly those moving into an area after entry to primary education where primary schools are already fully subscribed, or for those pupils resident in catchment area at entry to primary education who have been unsuccessful in their application for admission.

Adding designated feeder primary schools as an oversubscription criteria below residence in the catchment criteria of a school would give priority to a pupil in attendance at such a primary school above a pupil who does not attend such a primary school but lives in closer proximity to the secondary school.

Analysis undertaken on the cohort of pupils who were allocated places in the initial round of admissions for entry to secondary education in 2017 identified how many pupils were allocated by meeting each criterion, and how this may be affected by the inclusion of a criterion to those children who are resident within a school’s catchment area and also attending an in-catchment feeder primary school.

For the purpose of analysis, the schools whose catchment area is nested within the catchment area of the secondary school were considered to be the ‘feeder primary schools’.

The impact of including a criterion which would have given priority to pupils attending a feeder primary school in the 2017/18 intake would vary, but would have the effect of prioritising some pupils who are resident within the catchment area of the school and attending a feeder primary school over those who reside in catchment but live significantly closer to the school.

All pupils resident within the catchment area of Llanishen High School, and who were not attending a feeder primary school, would have been refused admission to the school in 2017.

Those pupils resident within the catchment area of Cardiff High School, and who were not attending a feeder primary school, would have been refused admission to the school if their home address was more than 0.268 miles from the school in the

initial allocation round for admission (a reduction of 1.347 miles compared to the actual allocation).

Those pupils resident within the catchment area of Fitzalan High School, and who were not attending a feeder primary school, would have been refused admission to the school if their home address was more than 1.278 miles from the school in the initial allocation round for admission (a reduction of 0.552 miles compared to the actual allocation).

The impact of including such a criterion would vary by area and from year to year but the extent of this impact is clearly closely related to the relative capacities of secondary schools and primary schools within their catchment, and the pupil populations within catchment areas.

The Council will consult on an option that includes the criterion within the published 2019/20 over-subscription criteria, and an alternate option that does not include the criterion within the published 2019/20 over-subscription criteria.

- **Recommendation 12 (medium-term): consider undertaking further analysis on the implications of creating dual-school catchment areas in Cardiff (i.e. by merging school catchment areas) to give higher priority to a wider 'pool' of prospective applicants.**

Response: The recommendation is accepted

The use of dual-school catchment areas are not presently used in Wales and only used by operated by one LA (Brighton) in the selected group of LAs within the WISERD report.

It would be prudent for the Council to consider the benefits or otherwise of dual-school catchment areas when undertaking the wider review of catchment areas.

- **Recommendation 13 (short-term): encourage the Welsh Government to consider updating its guidance on how religious adherence could be objectively measured in a simple and binary form.**

Response: The recommendation is accepted

Within Cardiff there are 87 community primary or secondary schools, 28 faith primary or secondary schools and one foundation secondary school. Faith schools and foundations schools determine their own admission arrangements and these vary from school to school.

The Council will encourage the Welsh Government to consider simplified and consistent arrangements with the relevant Diocese stakeholders.

- **Recommendation 14 (long-term):** consider encouraging the Welsh Government to consider how it might increase the diversity of schools (particularly in urban areas), but without it increasing segregation.
- **Recommendation 15 (long-term):** consider how the new curriculum in Wales might encourage greater diversification in provision between schools and how this could be embodied in future admission arrangements.
- **Recommendation 16 (long-term):** continue to monitor the need to introduce banding into Cardiff school admissions, including how this would be administered and encourage the Welsh Government to develop detailed guidance on how banding could be used in Wales.
- **Recommendation 17 (long-term):** encourage the Welsh Government to consider the opportunity to include random allocation as an acceptable tie-break criterion in the School Admissions Code.

Response: The recommendations are accepted

Each of the above recommendations would require analysis of future changes to provision and / or engagement with the Welsh Government on the consideration of changes to the School Admissions Code. Changes to the Code are not within the control of the Council.

The Council will investigate potential measures that may increase the diversity of schools, and will consider the logistical implications and the potential benefits or otherwise of such arrangements.

- **Recommendation 18 (medium-term):** encourage the Welsh Government to consider criteria that give priority to socio-economically disadvantaged pupils. Such guidance would be useful particularly in relation to how socio-economic disadvantage could be determined (e.g, by stating that the use of eligibility for free school meals would be an acceptable method for this despite its known limitations as a measure of disadvantage)

Response: The recommendation is partially accepted

The WISERD report notes that:

“segregation in Cardiff was higher than the average for Wales, typical for urban areas which are more residentially segregated to begin with... segregation was lower between Community schools than it was between all schools”.

It also concludes that:

“controlling admissions based on geography (catchment area or proximity) would have very little difference on the overall levels of segregation in Cardiff... the current oversubscription criteria are not worsening the underlying levels of residential segregation that exists across Cardiff. Equally, however, the current arrangements appear to have done very little to create more balanced intakes than we might expect based on where pupils live”

There are evidently significant differences in the percentages of pupils in receipt of free school meal between catchment areas, schools, and types of school (English-medium community, Welsh-medium community and faith schools) in Cardiff.

A criterion that gives greater priority to children living in poverty may address some of the segregation issues identified in the WISERD report.

Further consideration to how alternative admissions criteria may impact positively on diversity and/or socio-economically disadvantaged pupils, including discussion with WG regarding the use of the receipt of (or eligibility of) Free School Meals within oversubscription criteria, is required.

- **Recommendation: 19 encourage the Welsh Government to introduce statutory guidance for admission authorities to operate coordinated admissions systems. This could also consider the coordination of admissions across local authority boundaries.**

Response: The recommendation is accepted

Cardiff Council is operating as a pilot authority in Wales for coordinated admissions, in the absence of legislation to enforce such arrangements. There is a statutory requirement for Local Authorities in England to operate coordinated arrangements.

Progress with the implementation of the coordinated scheme will be reported to stakeholders including the Welsh Government.