

**SCHOOL ADMISSION ARRANGEMENTS 2021-22  
INCLUDING PROPOSED CHANGES TO WELSH-MEDIUM  
PRIMARY AND SECONDARY CATCHMENT AREAS**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH  
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**AGENDA ITEM: 4**

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**Reason for this Report**

1. In accordance with Section 89 of the School Standards and Framework Act 1998 and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006, Admission Authorities are required to review their School Admission Arrangements annually.
2. This report is to inform the Cabinet of responses received following consultations on:
  - The Council's School Admission Arrangements 2021-22;
  - The proposed changes to Welsh-medium primary and secondary catchments 2021-22.

**Background**

3. In order to comply with the legislation above, School Admission Arrangements for implementation in the 2021/2022 academic year (i.e. from September 2021) must be determined on or before 15 April 2020.
4. The Education (Determination of Admission Arrangements) (Wales) Regulations 2006 and the School Admissions Code set out the procedure which admission authorities should follow when determining their admission arrangements, including that proper consultation must be carried out and that the arrangements should be determined by 15th April in the school year beginning two years before the school year which the arrangements will be for. School catchment areas form part of the Council's admissions arrangements for its community schools.
5. The Council issued its draft School Admissions Policy 2021/22 (attached as Appendix 1) for consultation on 16 January 2020 to all those the Council are required to consult with, as set out in the Welsh

Government's School Admissions Code (Headteachers, Governing Bodies, Diocesan Directors, neighbouring Local Education Authorities). Details of the School Admissions Policy consultation were promoted via social media and via schools, and the draft policy published on the Council's website.

6. The Council also published a consultation document, setting out proposed changes to Welsh-medium primary and secondary school catchment areas. The consultation document was published on the Council's website on 16 January 2020. In accordance with the requirements of the Admissions Code, the Council consulted with the above consultees, and additionally with parents of children who may be affected by the proposed changes. Letters were issued to parents of pupils attending the relevant schools and to children aged 0-3 within the catchment areas of the relevant primary schools, directing parents to the consultation document on the Council's website. A copy of the consultation document, outlining background, rationale and implications of the proposals, is attached as Appendix 2.
7. Responses to each consultation were invited by 26 February 2020.
8. To ensure that the voices of children and young people were heard and taken into account, officers facilitated engagement sessions at primary and secondary schools directly affected by proposed changes to catchment areas.

### **School Admission Arrangements**

9. The proposed changes to the arrangements for 2021/22 compared to the arrangements for 2020/21, included:
  - Changes for the admission of children with Additional Learning Needs, who have an Individual Development Plan, which corresponds with changes in the draft ALN Code.
  - The implementation of coordinated arrangements with the Governing Body of St Mellons Church in Wales Primary School for admissions to the school
  - Clarification of when the Council would consider an applicant's circumstances to have changed, and that an application would then be considered as a new application.
  - Clarification of timescales for the withdrawal of the offer of a school place.
10. The Council is also proposing the continuation of coordinated secondary school admission arrangements, which applies to all community secondary schools; Corpus Christi RC High School; St. Teilo's CW High School and Whitchurch High (Foundation) School.

### **Welsh-medium primary and secondary catchment areas**

11. The Council established Ysgol Gyfun Gymraeg Bro Edern in 2012 and consulted at that time on establishing a catchment area for the school

and balancing the catchment areas of the two other Welsh-medium secondary schools, Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr.

12. To reflect the transfer and expansion of Ysgol Gymraeg Treganna, the Council also consulted on changes to the primary school catchment areas of Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna at this time.
13. Further changes to primary and secondary school catchment areas were implemented in subsequent years to balance the supply of and demand for places in a growing sector.
14. The Council established Ysgol Gynradd Gymraeg Hamadryad in 2016, to serve the communities of Butetown and South Grangetown. The school was temporarily accommodated on the Ninian Park Primary School site in Grangetown, within the catchment area of Ysgol Gymraeg Pwll Coch.
15. In the 2018/19 school year, the school transferred to its current site in Butetown which lies within the catchment area of Ysgol Mynydd Bychan. It is therefore appropriate to consult at this time on proposals to establish a catchment area for the school, and to revise other primary school catchment areas.
16. The number of children entering Welsh-medium primary education city-wide fluctuated between 2009/10 to 2016/17. Consistent with the overall population, the number of children entering Welsh-medium education was on an upward trend. The number of children entering Welsh-medium reception classes city-wide peaked in 2016/17 at 744 pupils. Table 1 (overleaf) sets out the recent Number on Roll (NoR) data for Welsh-medium primary schools in Cardiff, and projected intakes based on recent demand.

<b>Table 1: Recent and projected numbers of children enrolled in Welsh-medium Reception Year in Cardiff schools</b>			
School Year	Total pupils (English-medium, Welsh-medium and Faith schools)	Pupils in Welsh- medium schools and classes	% in Welsh- medium schools and classes
January 2010	3683	572	15.5%
January 2011	3859	594	15.4%
January 2012	4019	651	16.2%
January 2013	4221	686	16.3%
January 2014	4256	678	15.9%
January 2015	4270	708	16.6%
January 2016	4345	690	15.9%
January 2017	4340	744	17.1%
January 2018	4098	709	17.1%
January 2019	4125	702	16.9%
October 2019	4116	684	16.6%
2020/21 (projected)	4107	715	17.4%
2021/22 (projected)	3721	648	17.4%
2022/23 (projected)	3682	641	17.4%

17. Following a fall in the birth rate in 2012/13, the number of children entering Reception has also fallen in recent years. In October 2019, there were 684 pupils enrolled in Welsh-medium Reception classes city-wide, compared to 840 places available.
18. The number of children entering Reception from existing housing city-wide is projected to fall further in the period 2021-2023, consistent with a further fall in the birth rate. As a proportion of the total population within the cohort entering primary education, the percentage within Welsh-medium schools and classes has fluctuated between 15.4% and 17.1% in the period 2009/10 – 2018/19.
19. The 840 places available at entry to Reception Year in Welsh-medium primary education could accommodate up to 22% of the projected population, and the Council is therefore well placed to increase the percentage of pupils taking up places in Welsh-medium education. However, further growth in the sector would be supported by changes to some primary school catchment areas.
20. The overall growth trend in the number of children entering Welsh-medium primary education in the period 2009/10 to 2016/17, and fall in the past three intakes, provides a robust basis for projecting intakes to secondary education in the period 2020/21 to 2025/26.
21. With reducing surplus places in Welsh-medium secondary schools as the increased pupil population promotes to secondary education, it is clearly imperative to also consider the balance between the number of places available at each secondary school, and the projected demand for places within each catchment area in the short to medium term.
22. The Council has worked closely with its partners on the Cardiff Welsh Education Forum to identify changes to catchment areas that would provide a sustainable, strategic solution to support the growth of Welsh-medium education in Cardiff.
23. The proposed changes to primary school catchment areas include:
  - The establishment of a catchment area for Ysgol Gynradd Gymraeg Hamadryad;
  - Changes to the catchment areas of Ysgol Mynydd Bychan, Ysgol Gymraeg Nant Caerau, Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna.
24. The Council consulted on two options in the primary school phase, within which alternative boundaries between Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna were proposed.
25. The proposed changes to secondary school catchment areas include:

- The transfer of the Ysgol Glan Morfa catchment from Ysgol Gyfun Gymraeg Glantaf to Ysgol Gyfun Gymraeg Bro Edern
  - An amendment to the boundary between the catchment areas of Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr, at the primary school boundary between Ysgol Pwll Coch and Ysgol Treganna.
26. The Council consulted on two options in the secondary school phase, within which alternative boundaries between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasdwr were proposed. These proposed boundaries were coterminous with the proposed boundaries within the primary phase.
27. The changes proposed within the consultation seek to improve the overall balance in the number of pupils and places in primary and secondary school catchment areas.
28. A separate consultation on changes to English-medium community secondary school catchment areas will be brought forward at the appropriate time, in order to provide a suitable and sustainable balance in the supply of and take-up of places. This consultation would take place following determination of proposals, within the 21st Century Schools Band B investment programme, which seek to expand provision in some areas of city. In accordance with the requirements of the Admissions Code, any such changes could not take effect sooner than the 2022/2023 academic year.

### **Responses received regarding the proposal during the consultation period**

29. In total 116 responses were received during the consultation period. Many of the responses raised concerns or made suggestions in respect of both the school admissions policy and Welsh-medium school catchment areas.
30. Formal responses were received from:
- Cllrs Cunnah, Elsmore and Patel (Canton)
  - Mark Drakeford, Assembly Member for Cardiff West
  - Moorland Primary School - Headteacher
  - Ysgol Gyfun Gymraeg Hamadryad – Chair of Governing Body
  - Ysgol Gymraeg Nant Caerau – Chair of Governing Body
  - Ysgol Gymraeg Pwll Coch – Headteacher, on behalf of Governing Body
  - Ysgol Gymraeg Treganna – Chair of Governing Body
  - Ysgol Gymraeg Treganna – Headteacher
  - Fitzalan High School – Assistant Headteacher
  - Ysgol Glan Morfa - Headteacher
  - Ysgol Gyfun Gymraeg Bro Edern – Headteacher
  - Ysgol Gyfun Gymraeg Bro Edern cluster of schools – joint response

- Ysgol Gyfun Gymraeg Glantaf - Headteacher
- Ysgol Gyfun Gymraeg Plasmawr – Headteacher
- Rhieni dros Addysg Gymraeg (RhAG)

31. Full copies of the formal responses can be seen at Appendix 3.

### **Pupil Representation**

32. Officers met with pupil representatives at the Welsh-medium primary schools directly affected by proposals, and with pupil representatives at each of the Welsh-medium secondary schools, to engage with the pupils and to gather their opinions about the proposal.
33. Contemporaneous notes of meetings with pupils are attached at Appendix 4. A summary analysis of the views expressed by pupils is attached as Appendix 5.
34. Pupils were introduced to the idea of admission arrangements and school catchment areas, and what the proposed changes meant for schools, children and families.
35. Pupils were interested and engaged in the information being shared in the consultation and were keen to ask questions and share their views, ideas and suggestions on the proposals.
36. Pupils at Ysgol Gynradd Gymraeg Hamadryad recognised the benefits of a school having a catchment area, and of attending a local school, although they expressed concern for Ysgol Gymraeg Pwll Coch and Ysgol Mynydd Bychan losing parts of their catchment areas.
37. Pupils at Ysgol Gymraeg Pwll Coch were unanimous in supporting Option A, as they felt this way they would retain more pupils within their school.
38. Pupils at Ysgol Gymraeg Nant Caerau made points about the capacity of different schools and some pupils expressed concern about their catchment area reducing.
39. Pupils at Ysgol Gymraeg Treganna expressed concern over siblings potentially having to be separated and attending different high schools, and the pressure on parents as a result. They were also concerned about children living on the edge of school catchment areas, and expressed concern at how changes cause issues for everyone.
40. Pupils at Ysgol Glan Morfa expressed concern over siblings potentially having to be separated and attending different high schools. Concerns were also raised over travel to Ysgol Gyfun Gymraeg Bro Edern, and the potential cost of this.
41. Pupils at Ysgol Gyfun Gymraeg Glantaf were particularly concerned over peer groups potentially being separated and attending different high schools. They suggested a feeder-school system would be beneficial,

and that younger siblings should be given a choice of attending the same school as their older siblings.

42. Pupils at Ysgol Gyfun Gymraeg Bro Edern noted the benefits of being closer to your catchment school. They expressed concern over siblings potentially having to be separated and attending different high schools, and suggested that increased protection should be offered in these circumstances. They noted there might be increased travel costs for some families.
43. Pupils at Ysgol Gyfun Gymraeg Plasmawr raised concerns over siblings and friends potentially having to be separated and attending different high schools; particularly for those who lived on catchment boundaries. Pupils expressed desire for an added protection for children who had older siblings attending a school they were no longer in the catchment for.

### **Appraisal of consultation responses**

44. A summary and appraisal of the responses received from all stakeholders is attached as Appendix 6.
45. Of the 116 responses received to the consultation, there were 86 respondents who clearly identified that they were responding as parents, parents to be, or grandparents. There were 39 respondents stating such a relationship with Ysgol Gymraeg Treganna, 12 with Ysgol Gyfun Gymraeg Bro Edern, and six with Ysgol Glan Morfa. There were four responses or fewer in respect of other schools, including Ysgol Gyfun Gymraeg Glantaf, Ysgol Gyfun Gymraeg Plasmawr, Ysgol Y Berllan Deg, Ysgol Gymraeg Hamadryad, Ysgol Gymraeg Pwll Coch, Ysgol Y Wern and Birchgrove Primary School.
46. Of those who responded to the consultation in respect of changes to primary school catchment areas, six respondents generally supported changes, three specifically supported option A, 23 supported option B and 20 did not support any changes to primary school catchment areas.
47. Of those who responded to the consultation in respect of changes to secondary school catchment areas, 15 respondents generally supported changes, three specifically supported option A, 22 supported option B and 44 did not support any changes to secondary school catchment areas.
48. Points of concern raised in response to the consultation are set out below
  - The potential for primary aged siblings having to attend different primary school would result in logistical issues for parents.
  - Childcare arrangements have been put in place based on existing catchment area arrangements. Any changes are likely to cause difficulties for parents and children.

- The proposed changes at primary level would result in some pupils having to travel further to school, which would lead to more people choosing to drive increasing traffic congestion and pollution.
- The proposed transfer would result in some pupils being separated from their primary school friends upon promotion to high school, which would have a negative impact on mental health and wellbeing.
- The proposed changes to primary and secondary catchment boundaries in the Canton area would lead to the fragmentation of the community.
- The proposed transfer of part of the Ysgol Gymraeg Treganna catchment from the Ysgol Gyfun Gymraeg Plasmawr catchment into the Ysgol Gyfun Gymraeg Glantaf catchment will result in some children transferring to high school in September 2021 being unable to attend the same high school as older siblings which will cause difficulties for children and parents.
- The implementation of any changes should be phased allowing for those children already at Ysgol Treganna to promote to high school with primary school friends.
- Whilst the travel distance from the Adamsdown, Splott and Tremorfa areas to Ysgol Gyfun Gymraeg Bro Eder is less than three miles, the routes to school are difficult. The lack of direct bus routes will result in children either being driven to school, having to cross busy roads or having to spend over an hour taking a bus to the nearest point and walking from there.
- The proposed transfer of part of the Ysgol Gymraeg Treganna catchment from the Ysgol Gyfun Gymraeg Plasmawr catchment into the Ysgol Gyfun Gymraeg Glantaf catchment will not support the balance of places at the schools and will impact negatively on the socio-economic balance between the two schools.
- The proposed transfer to the Ysgol Glan Morfa catchment area from the Ysgol Gyfun Gymraeg Glantaf catchment into the Ysgol Gyfun Gymraeg Bro Eder catchment will impact on education standards at the school.
- The transfer of the Ysgol y Wern catchment area into the Ysgol Gyfun Gymraeg Bro Eder, instead of Ysgol Glan Morfa, would allow for a more even distribution of children from Welsh first language homes between Ysgol Gyfun Gymraeg Bro Eder and Ysgol Gyfun Gymraeg Glantaf.
- The projected numbers for the number of children taking up places in Welsh-medium primary education are incorrect.
- The proposed changes could result in parents being discouraged from taking up/continuing with Welsh-medium education.

## Summary

49. The consultation on School Admissions Arrangements for 2021/2022 sought to respond to changes planned within the ALN Code, to clarify administrative processes, and to implement co-ordinated admission arrangements with a number of schools. The consultation also invited comment on alternative options for admission to Welsh-medium primary and secondary education.

50. The Council established Ysgol Gynradd Gymraeg Hamadryad in September 2016 initially within temporary accommodation adjacent to Ninian Park Primary School, ahead of a planned transfer to its permanent location at Hamadryad Road, Butetown. The school has transferred to its permanent site in the 2018/19 school year. The consultation sought to provide clear arrangements for families of primary school children living in this area of the city.
51. The Council has closely monitored the take up of Welsh-medium places at entry to secondary education and has sought to expand provision at the appropriate time to ensure that all children who wish to transfer to a local Welsh-medium secondary school are able to do so.
52. There were no responses to the consultations which commented on the changes that were proposed to oversubscription criteria for admission to nursery, primary and secondary education the School Admissions Policy.
53. However, the majority of responses to the consultations suggested changes to the oversubscription criteria that were not part of the consultation. There were notable differences of view expressed about each of the options consulted on, in relation to primary and secondary school catchment areas.
54. Any modification to the admissions policy or oversubscription criteria for community schools must apply to all schools of that age range in Cardiff.

#### **Admission to Nursery Education**

55. There were no concerns raised in respect of proposed change to the oversubscription criteria for admission to nursery education and it is therefore proposed that the criteria are implemented as consulted on.

#### **Admission to Primary Education**

56. There were no concerns raised in respect of proposed change to the oversubscription criteria for admission to primary education.
57. A number of formal responses, and responses from other stakeholders including parents, requested assurance that specific priority be given to pupils affected by changes to primary school catchment areas.
58. A criterion which gives priority to those pupils who may be affected by changes to primary school catchment areas is included within the oversubscription criteria for primary education. The Council does not propose to remove this criterion.
59. In response to responses received during the consultation, suggesting a minor amendment to the criterion to clarify this prioritisation, a minor amendment is proposed as follows:

*(Criterion 5) Children who have a brother or sister attending the school, admitted before catchment area change:*

*a) Where an older sibling was admitted to and continues to attend a school that was previously the catchment area school for the home address of the family at the time of the older sibling's admission, if the parent applies, the Council will give priority to younger siblings to the former catchment school.*

*b) Where an older sibling was admitted to and continues to attend a community school that had no determined catchment area at the time of the older sibling's admission, if the parent applies, the Council will give priority to younger siblings to this school.*

## **Admission to Secondary Education**

60. There were no concerns raised in respect of proposed changes to the oversubscription criteria for admission to secondary education.
61. A number of formal responses, and responses from other stakeholders including parents, requested assurance that specific priority be given to pupils affected by changes to secondary school catchment areas. All of these responses related to the proposed change to the catchment area boundary between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr, in Canton and Riverside. Such a criterion was removed from the oversubscription criteria in the 2019/2020 academic year, following consultation.
62. The Council considered the advantages and disadvantages of retaining the criteria which give priority to those pupils who may be affected by changes to secondary school catchment areas in its consultation on admission arrangements for the 2019/20 academic year. Some pupils benefited by securing places where they met this criterion, and were prioritised over children resident within the catchment area of a school. This caused resource planning issues for some schools, and there was a cumulative effect for those in-catchment pupils who in turn were unable to attend their catchment area school. The logistical challenge of transporting siblings to different schools was not considered to be a significant concern for pupils of secondary school age.
63. Analysis of consultation responses must therefore consider whether there is sufficient benefit in the city-wide Cardiff context to implementing such a change.
64. A number of responses to the consultation indicated a preference for arrangements that allow the prioritisation of applicants on the basis of retaining the peer group from their primary school. An oversubscription criteria which provides such prioritisation would in effect be a feeder school arrangement.
65. The responses suggested that the introduction of a peer-group prioritisation within the arrangements would give a higher level of certainty of admission of Ysgol Gymraeg Treganna pupils to Ysgol Gyfun Gymraeg Plasmawr in 2021/2022.

66. The reasons for not implementing feeder school arrangements in Cardiff were summarised in the report on School Admission Arrangements considered by the Cabinet at its meeting of 15 March 2018. Arrangements which give priority to pupils based on attendance at a specific primary school potentially disadvantage:
- families moving to Cardiff to take up job opportunities as the local economy grows
  - pupils from some ethnic groups who are more likely to move home including asylum seekers, refugees and members of some BAME communities
  - families moving house because of housing relocation or other family reasons, including vulnerable, low income families who do not maintain permanent, secure accommodation
  - pupils wishing to transfer from a faith primary school to a community secondary school, particularly pupils who do not meet the faith school priority admission criteria
  - pupils wishing to transfer from a Welsh-medium primary school to English-medium secondary school (or vice versa), and this may deter parents from considering Welsh-medium primary education
67. The admission of pupils under a feeder school arrangement would mean that pupils resident within the catchment area of a school, who were not enrolled at a feeder school, would be less likely to gain admission unless the feeder school criterion was of a lower priority. These pupils may be further disadvantaged when seeking admission to alternative schools.
68. There were few responses to the consultation on this aspect of the oversubscription criteria received from individual respondents in areas of Cardiff other than Canton and Riverside.

### **Welsh-medium primary school catchment areas**

69. Responses to the consultation supported the establishment in principle of a catchment area for Ysgol Gynradd Gymraeg Hamadryad, or made no comment on that aspect of the consultation.
70. Consultation responses raised a number of issues and concerns specific to the implementation of option A, or to the implementation of Option B, in the primary phase.
71. It should be noted that the significant majority of respondents to the consultation, and the majority of respondents who specified a preference for primary/ secondary option A over primary/ secondary option B, were resident in the relevant areas and also had children attending the affected schools.
72. A number of responses favouring a specific option also stated a preference that no changes should be made to the catchment areas of Ysgol Gymraeg Pwll Coch and Ysgol Treganna in Canton and Riverside.

73. A number of responses did not explicitly state a preferred option, but stated reasons for not supporting any changes within their local area.
74. The Council did not indicate a preferred option within the consultation document. Full consideration was given to the reasons given by respondents for supporting or not supporting changes.
75. Responses from the Governing Bodies of Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna each stated a preference to implement the option which projected a greater number of pupils within the catchment area of their school, and expressed concerns around the risk for growing the school and maintaining school budgets of a reduced catchment area.
76. Responses from other stakeholders outlined in detail the difficulties for their families, and for families who may be affected by the arrangements for their area.
77. The consultation document, attached as Appendix 2, sets out the projected demand for places within each primary school catchment area, taking account of the most recent population data and PLASC data supplied by schools. In order to establish a catchment area for Ysgol Hamadryad, it would be necessary to extend the catchment area of Ysgol Gymraeg Pwll Coch to the north and/ or west of its existing area. Retaining the existing boundary between Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna may not provide a sufficiently large catchment area and intake of pupils to Ysgol Gymraeg Pwll Coch.
78. The responses to the consultation from parents indicate that many younger children within the areas proposed to transfer from Ysgol Gymraeg Treganna to Ysgol Gymraeg Pwll Coch would continue to express a preference for Ysgol Gymraeg Treganna. This would limit the potential impact of a reduction in the intake to Ysgol Gymraeg Treganna in the short to medium term. Within the next five years, the Ely Mill housing development is also anticipated to positively affect the number of pupils stating a preference for admission to Ysgol Treganna.
79. The implementation of Option A would therefore provide the most suitable balance between the number of places available at each school, and the local pupil populations, when taking account of stated parental preferences in the short to medium term.
80. The concerns raised by parents responding to the consultation, by pupils in consultation meetings, and by other stakeholders in respect of the difficulties of siblings attending separate primary schools would be mitigated by the relevant admissions oversubscription criterion. This prioritises the admission of younger siblings over all other pupils within the catchment area who do not have medical/ social grounds or siblings attending the school.
81. It is therefore proposed that the School Admission Arrangements 2021/2022 implement Option A for changes to Welsh-medium primary

school catchment areas, as set out within the consultation document attached as Appendix 2.

### **Welsh-medium secondary school catchment areas**

82. Formal responses to the consultation in respect of the proposed transfer of the primary school catchment area of Ysgol Glan Morfa to Ysgol Gyfun Gymraeg Bro Edern were predominantly supportive of the proposed change. The responses of the Headteacher of Ysgol Glan Morfa, the Headteacher of Ysgol Gyfun Gymraeg Bro Edern and a combined response of the schools within the Bro Edern cluster welcomed the proposal but highlighted the more difficult journey for pupils to school, compared with the free home to school transport to Ysgol Gyfun Gymraeg Glantaf.
83. A number of responses from parents, who were neither parents of Ysgol Glan Morfa children nor resident within the catchment area of Ysgol Glan Morfa, suggested that the proposed transfer should not proceed as this would negatively impact the school. Concerns raised included the impact on the socio-economic balance between the school communities of Ysgol Gyfun Gymraeg Bro Edern and Ysgol Gyfun Gymraeg Glantaf, citing factors including the relative levels of deprivation within each communities and the take up of Free School Meals at each school.
84. An alternative proposal, suggesting the transfer of the primary school catchment area of Ysgol Y Wern to Ysgol Gyfun Gymraeg Bro Edern was made by a number of stakeholders; however, there would not be sufficient surplus places at Ysgol Bro Edern to add the number of pupils within the catchment area of Ysgol Y Wern (c70 – 90 pupils per year group) to its existing catchment area.
85. Responses from parents of children living within the catchment area of Ysgol Glan Morfa noted the reduced travelling distance to school and that this would mean that free home to school transport would not be provided. Concerns were raised by some stakeholders in respect of the route to school, and a number of stakeholders requested that improvements be made to local bus routes, or a dedicated bus be provided to assist.
86. Consultation responses raised a number of issues and concerns specific to the implementation of option A, or to the implementation of Option B, in the secondary phase. Each option proposed to transfer part of the secondary school catchment area of Ysgol Gyfun Gymraeg Plasmawr to Ysgol Gyfun Gymraeg Glantaf, thus retaining coterminous boundaries with the primary school boundaries of Ysgol Gymraeg Pwll Coch and Ysgol Gymraeg Treganna.
87. However, it is clear from evaluation of responses to the consultation that implementing the change between the catchment areas of Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr is not supported by the majority of parents of children who live within the areas proposed to transfer and who responded to the consultation.

88. A number of responses from parents favouring a specific option also explicitly or implicitly indicated a preference that there should either be no change made to secondary school catchment areas in Canton/ Riverside, or that any changes should not be made at this time. A number of formal responses to the consultation raised similar concerns. Changes to admissions oversubscription criteria were suggested to support pupils to transfer with their peer group from primary school.
89. The response of Ysgol Gyfun Gymraeg Plasmawr raises concerns in respect of how the proposed changes do not provide a sustainable balance in the supply and demand of secondary school places between Ysgol Gyfun Gymraeg Plasmawr and Ysgol Gyfun Gymraeg Glantaf. The response also asks that further consideration is given to 'balancing the nature and socio-economic composition of the three Welsh-medium secondary schools to benefit Welsh-medium education' city-wide. The response notes that the loss of pupils from such areas, following an earlier change to transfer the catchment area of Ysgol Pencae to Ysgol Gyfun Gymraeg Glantaf, may significantly impact the school community and polarise perceptions of Welsh-medium secondary schools.
90. The proposed changes in Canton and Riverside, and in Adamsdown Splott and Tremorfa, would each reduce the percentage of children in receipt of Free School Meals (FSM) within the catchment area of Ysgol Gyfun Gymraeg Glantaf and would increase the percentage in both Ysgol Gyfun Gymraeg Plasmawr and Ysgol Gyfun Gymraeg Bro Edern. The FSM measure is most commonly used to compare relative deprivation within schools as it is directly attributable to individual pupils. However, the percentages of pupils in receipt of FSM in each Welsh-medium secondary school are relatively low when compared to English-medium secondary schools in Cardiff.
91. Analysis of the number of pupils resident in the areas of Cardiff ranked in the top 10% Welsh Index of Multiple Deprivation also indicates that each option would decrease the number of these pupils in the Ysgol Glantaf catchment, and increase those in the other two catchment areas. However, proportionately few children enrolled in Welsh-medium schools are resident in those areas (c10% of the most recent intake), and a relatively low proportion of children in those areas are enrolled in Welsh-medium schools (c4% of the most recent intake).
92. The proposed changes to the Ysgol Gymraeg Pwll Coch/ Ysgol Gymraeg Treganna boundary in Canton and Riverside would improve the balance between the number of school places and the demand for these places. Conversely, the balance in the secondary sector, in 2021/22 and the years that follow, would be worsened by implementing a change in the boundary between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr.
93. Within the next five years, the ongoing housing developments at Ely Mill in Canton and Plasdwr in north west Cardiff, within the catchment area of Ysgol Gyfun Gymraeg Plasmawr, are expected to increase the projected

demand for places in the Ysgol Gyfun Gymraeg Plasmawr catchment area.

94. The Council has sought to establish and retain coterminous primary and secondary school boundaries in both the English-medium and Welsh-medium sector. This has been well understood by parents and schools, and has supported both parents and schools in planning for transition between the primary and secondary phase. However, residing within the catchment area of any school does not guarantee admission to that school.
95. In light of the above context, and concerns raised, it is appropriate to consider the advantages and disadvantages of diverging from coterminous boundaries in this area for an interim period.
96. Responses to the consultation suggest that the preferred Welsh-medium secondary school of the majority of responders within the affected area is Ysgol Gyfun Gymraeg Plasmawr.
97. Amending the boundary between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr would not provide an improved balance between projected demand and capacity within each catchment area. Implementing either change would make little if any difference to parental preference and eventual take up of places in the short to medium term.
98. In summary, there is insufficient evidence that the proposed change to the secondary school catchment areas would be of benefit in the local or city-wide Cardiff context at this time. It is therefore proposed that the boundary between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr is not amended for the 2021/2022 academic year, and that the amendment is deferred until a later date when changes are necessary to meet the increasing demand in the Ysgol Gyfun Gymraeg Plasmawr catchment area.
99. It is anticipated that changes to the catchment area of Ysgol Gyfun Gymraeg Plasmawr would be necessary for the 2026/2027 intake year, at which time the first cohort of pupils from the planned new primary school at Plasdwr would promote to secondary education.
100. The consultation on admission arrangements included pupil projection data that reflected the proportionate take up of places in each catchment area in the past three years, as verified by schools within their annual school census (PLASC). Any change to the pattern of take up would affect future intakes.
101. An initial analysis of school admissions preference data, for children entering Reception in September 2020, indicates a likely significant rise in the demand for Welsh-medium primary school places. The Council has strategically increased the number of Welsh-medium primary school places in the past eight years. The increased capacity, and the proposed changes outlined during the consultation process, seek to enable and support sustainable growth within the Welsh-medium sector.

102. The proposed changes within this report are not compromised by the expected increase in take up of Reception places in 2020/2021. This increase would be expected to have a positive impact on the intakes to primary schools named in this report.
103. It should be noted that the School Admissions Policy to be determined by the Cabinet applies to the 2021/2022 intake year only and that whilst some pupils may be unable to attend their catchment area school, changes to catchment areas that take account of proposed changes to school capacities will be considered for later intake years.

### **Supporting parents through admissions process**

104. A response from the Headteacher of Moorland Primary School raised concerns that some parents have had difficulty in understanding the admissions process, and that the introduction of an online admissions process has exacerbated the difficulties. Schools provide support and assistance to parents throughout the process but further assistance from the Council would be welcomed.
105. The Council is keen to support parents and schools through the admissions process and has committed to a work programme in partnership with Headteachers to identify and implement improvements that improve accessibility.

### **Local Member consultation**

106. All Members were consulted on the draft Admissions Arrangements 2021/2022. The formal response of the Canton Councillors is attached in Appendix 3.

### **Reason for Recommendations**

107. The Council is required to review its school admission arrangements annually and to agree the arrangements following appropriate consultation.

### **Financial Implications**

108. The financial implications directly arising from this report relate to the existing and potential requirement to provide free home to school transport. Should the proposal result in a change to the school transport provision required, it will need to be identified and considered as part of the Council's budget planning process and reflected in the Medium Term Financial Plan.
109. The funding provided to individual schools, including external grant funding, is largely predicated on the basis of pupil numbers. Therefore, any changes to the number of pupils admitted to an individual school, presents the possibility that the budget for a school will increase or decrease.

110. The impact of any changes in Cardiff wide pupil numbers will be kept under review, with consideration of other schools programmes including LDP Schools and 21st Century Schools programmes.

### **Legal Implications**

111. The Council has a statutory obligation under the Education Act 1996 to promote high standards of education for primary and secondary schools in its local authority area. Section 89 of the School Standards and Framework Act 1998 as amended by the Education Act 2002 determines that the Admission Authorities must carry out consultation before determining the admission arrangements which are to apply. The report shows that consultation has been conducted.
112. The Education (Determination of Admission Arrangements) (Wales) Regulations 2006 set out the procedure which the Admission Authorities should follow when determining their admission arrangements, including the consultation and notification process as well as timescales. In particular, the Admission Authority must determine arrangements in the school year beginning two years before the school year which the arrangements will be for, take all steps necessary to ensure that they will have completed the consultation required by section 89(2) before 1st March and determine the admission arrangements by 15th April. The arrangements must then be published within 14 days of the determination and appropriate bodies must be notified. The report shows that the consultation was conducted before the 1st March.
113. The Welsh Government has issued the School Admissions Code, which sets out the process for Local Authorities to follow when determining their admission arrangements. The School Admissions Code requires that no prohibited criteria (as set out on page 12 of the Code) are included in the admission arrangements and gives guidance on using various types of oversubscription criteria. This report reflects these requirements.
114. The Council also has to satisfy its public sector duties and obligations under the Equality Act 2010 (including the specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Council must also not directly or indirectly discriminate against any pupil in its admission arrangements, this means that no pupil or group of pupils may be treated less favourably based on a protected characteristic. Protected characteristics are:
- Age
  - Gender reassignment
  - Sex
  - Race – including ethnic or national origin, colour or nationality
  - Disability
  - Pregnancy and maternity

- Marriage and civil partnership
  - Sexual orientation
  - Religion or belief – including lack of belief
115. The Equality Impact Assessment specifically considers how the proposals may affect pupils with protected characteristics. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The Council must have due regard to these obligations when this decision is taken to determine the admission arrangements.
116. In accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language standards, the Council also has to consider the impact upon the Welsh language any decision that it makes and in accordance with the Welsh in Education Strategic Plan, the Council must consider how it can promote Welsh medium education. This report reflects those requirements.
117. The Council must also consider its legal obligations under the Wellbeing of Future Generations (Wales) Act 2015, which requires the Council to consider how the proposals will contribute towards meeting its well-being objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.

### **HR Implications**

118. An SOP Framework is in place, which provides the basis for managing the human resources issues associated with the School Organisation Programme. Whilst it is not anticipated that these recommendations will result in a reduction in pupils numbers for the affected schools, in line with SOP Framework, HR People Services will encourage the school leadership and Governing Bodies to consider their staffing requirement and structure in advance of any change being implemented.
119. Where it is anticipated to see an increase in pupil numbers, this may result in a requirement to recruitment additional staff. Where the Governing Body has adopted the School Redeployment and Redundancy Policy, the creation of any new employment opportunities would need to be considered as redeployment opportunities for staff on the school redeployment register.

### **Property Implications**

120. There are no property implications arising directly from the recommendations within this report.

## Traffic and Transport implications

121. The Council's duties to provide school transport for pupils are set out in the Learner Travel (Wales) Measure 2008. Under the Measure, the Council has no statutory responsibility to provide free home to school transport to pupils attending the nearest available school provided, when:
- the pupil resides under the statutory walking distance of 2 miles from the nearest available primary school, or
  - the pupil resides under the statutory walking distance of 3 miles from the nearest available secondary school,
- as applicable according to the child's age.

The nearest available school can be an English-medium, Welsh-medium, Catholic or Church in Wales School.

122. The Council exceeds the requirements of the Learner Travel (Wales) Measure, by continuing to provide free transport to pupils residing 3 or more miles from their nearest appropriate secondary school, where the type of school is decided by the parents/carers. The Council would provide free transport to nearest appropriate school be it an English Medium Community School, a Welsh Medium Community School, a Foundation School, a Church in Wales Voluntary Aided School or a Roman Catholic Voluntary Aided School. If parents/carers choose to send their child to a school other than the nearest appropriate school, the pupil will not be entitled to free school transport, even if the pupil lives beyond the statutory walking distance.
123. Under these proposals there are no plans to change the Council's policy on the transport of children to and from schools. Any pupils affected by these proposals as a result of changes to the catchment area will be offered the same support with transport as is provided throughout Cardiff and in accordance with the same criteria that apply across Cardiff.
124. There are no significant school transport implications directly arising from the proposals to amend primary school catchment areas. However, the proposals seek to improve the balance between the number of pupils in primary school catchment areas, and this would reduce the potential for children to be refused admission to their nearest appropriate primary school. This, in turn, would reduce the potential liability for the Council to provide free home to school transport for primary school pupils.
125. There are school transport implications directly arising from the proposals to transfer the catchment area of Ysgol Glan Morfa from Ysgol Gyfun Gymraeg Glantaf to Ysgol Gyfun Gymraeg Bro Eder.
126. Pupils resident within the Ysgol Glan Morfa catchment area currently qualify for free home to school transport to Ysgol Gyfun Gymraeg Glantaf. All addresses within the Ysgol Glan Morfa catchment area have an available walking route of below 3 miles walking distance of the Ysgol Gyfun Gymraeg Bro Eder site.

127. A route is considered 'available' if a child without a disability or learning difficulty can walk the route alone or is accompanied as appropriate by a responsible person if the pupil's age and levels of understanding requires it. In accordance with the Learner Travel Measure all routes are assessed on the assumption that pupils are accompanied as necessary by a responsible person. It is for a parent to decide whether or not a child needs supervision on their journey, and this is for the parent/carer to arrange if they are unable to do it themselves.
128. The Cardiff Council Passenger Transport Team would be able to provide families with advice on available walking routes to Ysgol Gyfun Gymraeg Bro Eder based on individual home addresses.
129. As the proposal only refers to pupils commencing in Year 7 from the 2021/2022 academic year, it is expected to reduce the Council's overall liability towards providing school transport in the medium to long term. The Council would continue to provide free transport to older pupils resident in the Ysgol Glan Morfa catchment area to Ysgol Glantaf for the remainder of their studies, the final pupils receiving free transport in the 2024/2025 academic year.
130. Should the proposal be implemented, no pupil in Year 7 from the 2021/2022 academic year resident in the Ysgol Glan Morfa catchment area would qualify for free home to school transport to attend Ysgol Gyfun Gymraeg Bro Eder or Ysgol Gyfun Gymraeg Glantaf.
131. The Council would not be providing fee-paying school transport from the Ysgol Glan Morfa catchment area to Ysgol Bro Eder as all pupils live within walking distance. There is no funding available to provide this service and to do so could set a precedent for other pupils within a similar distance of their nearest appropriate secondary school.
132. The Council is liaising with commercial bus operators with a view to providing a fare paying service from the Adamsdown, Tremorfa and Splott areas to Ysgol Bro Eder. A route has previously operated from this area to Ysgol Bro Eder but was withdrawn by the operator owing to low take up of the service at that time.
133. Should the transfer of the catchment area of Ysgol Glan Morfa to Ysgol Bro Eder not be implemented, the Council would continue to be responsible for the costs of transporting pupils, who are successful in gaining admission to Ysgol Glantaf, from the Adamsdown/ Tremorfa/ Splott areas of the City.
134. In addition should the proposal to transfer the catchment area of Ysgol Glan Morfa to Ysgol Bro Eder not be implemented, the Council would anticipate an increasing liability for providing free transport to pupils from other parts of the Ysgol Glantaf catchment area. Some pupils resident within the catchment area, and who live furthest from the school, may be unable to gain a place at the school due to over subscription. These pupils would be eligible for free transport to the nearest alternative Welsh-medium secondary school.

135. There are no immediate school transport implications directly arising from the proposals to amend secondary school catchment areas in Canton/Riverside, at the boundary between Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr. Pupils resident in these areas would be expected to gain admission to either of these schools and would reside within three miles walking distance from either school. This would continue to be the case whether either the changes outlined in option A or option B were implemented, or neither option were implemented.
136. However, if pupil numbers within the Ysgol Gyfun Gymraeg Plasmawr catchment area were to significantly increase in the medium term, some pupils at the furthest proximity from the school in parts of Ely and Caerau may be unable to gain admission and would qualify for free home to school transport to the nearest alternative Welsh-medium school.
137. The Planning Transport and Environment Service area is committed to facilitating sustainable transport within Cardiff. One of the most important areas of attention in this regard is with respect to how parents and children travel to and from their school. Encouraging parents and children to adopt sustainable forms of transport has the following benefits (the first two being directly related to the pressure on the highway network).
- (i) Impact on network - Journeys to and from schools using unsustainable forms of transport (e.g. petrol or diesel powered, private motor vehicles) has a major impact local environment and on the highway network and adds significant pressure to the distributor roads. This causes additional delays to general traffic and, more importantly, to more sustainable forms of transport. It is therefore important that parents and children use sustainable forms of transport in order to minimise this negative affect on the network.
  - (ii) Habits – Encouraging children to understand the benefits of, and to adopt use of, sustainable forms of transport early in their lifetime will increase the likelihood of them continuing to travel sustainably in the future. It is therefore important that children are educated about the benefits of sustainable transport and encouraged and supported to travel to and from their school by walking, cycling or public transport.
  - (iii) Health – All forms of sustainable transport tend to involve significantly more physical activity during the journey to and from school. This is particularly relevant for walking and cycling but also applies to the use of public transport (e.g. walking to and from the bus stop). Encouraging children to use sustainable forms of transport will therefore have a direct positive effect on their health as well as the indirect benefits that come from young people.
138. The traffic implications of this proposal are not known. However there could be an increase in traffic congestion as a result of an increase in

“school run traffic”. This is apparent in a number of responses to the consultation, where parents have advised of their intention to drive their child to school unless there is an alternative in place. Officers will contact all commercial and coach companies in the area to see if any of these operators would be interested in operating a commercial bus service between Adamsdown, Tremorfa, Splott and Ysgol Bro Edern. (See paragraph 130 above).

139. Consistent with the Council’s transport policies for the city it is strongly recommended that consideration is given to the ensuring that children are able to travel to and from their school using a sustainable mode of transport. One of the biggest factors that facilitates this, is the proximity of the children to the school. Ysgol Bro Edern is within walking and cycling distance of all pupils resident within the Ysgol Glan Morfa catchment area.
140. The Transport Vision Policy & Strategy Team is now actively working with Ysgol Glan Morfa to help implement measures to support journeys to school by walking and cycling. This work will contribute to the delivery of the commitment in the Council’s Corporate Plan for every school in Cardiff to have an Active Travel Plan in place.

### **Impact on the Welsh Language**

141. It is not anticipated that there would be any negative impact on the Welsh Language as a result of proposed changes to admission arrangements and catchment areas.
142. The Council has worked closely with its partners on the Cardiff Welsh Education Forum to identify changes to catchment areas that would provide a sustainable, strategic solution to support the growth of Welsh-medium education in Cardiff.
143. However, a number of consultation responses raised concerns about the potential impact of the proposed changes on Welsh language education.
144. These concerns sought reassurance that younger siblings affected by changes to catchment areas would be able to gain admission to the school that older siblings attend.
145. The Council acknowledges the concerns and has retained a criterion within the oversubscription criteria for entry to primary education which negates any disadvantages arising out of catchment area changes to these children in these specific circumstances.
146. A number of responses request arrangements that would enable children to promote to secondary education with their primary school peer group. However, the introduction of a feeder school system would limit the ability of children to transfer between English-medium and Welsh-medium education during the primary phase or at secondary level.

147. The introduction of a feeder based criteria would disadvantage parents who wish to transfer from Welsh-medium primary education to English-medium secondary education (and vice versa) and that the introduction of such criteria may deter some parents from considering education through the medium of Welsh.
148. The net percentage of pupils in Cardiff that progress from enrolling at Reception age into Welsh-medium primary education to enrolling in Welsh-medium secondary education has varied from 87% – 95% in the most recent cohorts. The introduction of a feeder based criteria may therefore increase the percentage of pupils that, having enrolled within Welsh-medium primary education, progress through to Welsh-medium secondary education, whilst potentially also acting as a disincentive to parents considering enrolling their child in Welsh-medium primary education.
149. The Council is committed to developing a Bilingual Cardiff. The Council's Welsh in Education Strategy (WESP) 2017 – 2020 will help Cardiff to support the Welsh Government's vision to see one million Welsh speakers across Wales by 2050.
150. The WESP is an integral part of the Council's 5 year Bi-lingual Strategy. The Council recognise that a strong and inclusive Welsh-medium education sector is vital if Cardiff is to develop as a truly bilingual city where Welsh is a vibrant living language. In accordance with the Welsh in Education Strategic Plans (Wales) Regulations 2019, the Council expects to consult on its WESP for the period 2021-2030 during the 2020/21 school year.
151. The Bilingual Strategy aims to increase the number of Welsh speakers within Cardiff and promote the use of the language throughout the city. The Council recognise that the education system is a key element in ensuring that children are able to develop their Welsh skills, and for creating new speakers
152. Whilst the likely impact on the Council's aim to increasing the number of Welsh speakers within Cardiff is unknown, there is a clear risk that the introduction of a feeder school arrangement may have a negative impact on the Welsh language overall.
153. Officers will continue to monitor birth rates, the yield from proposed housing and the patterns of take up in Welsh-medium provision at primary and secondary age with a view to being forward appropriate plans to meet any increased demand.
154. The teaching of Welsh within an English-medium setting is subject to the requirements of the National Curriculum. This would not change.

### **Wellbeing of Future Generations**

155. The Wellbeing of Future Generations (Wales) Act 2015 requires public bodies to make sure their decisions take into account the impact they

could have on people living in Wales in the future. The Council has done so in relation to its proposed school admission arrangements.

156. All Admission Authorities in Wales are legally bound to Section 84 of the Schools Standards and Framework Act (1998) (the Welsh Government's School Admission Code) and the Council has also complied with that legislation. Account is also taken of the Council's responsibility to provide and promote high standards of Education under the Education Action 1996.

### **Equality Impact Assessment**

157. An Equality Impact Assessment on this proposal has been carried out.
158. The assessment concluded that this proposed changes would not adversely affect a particular group in society (details of the Equality Impact Assessment can be seen at Appendix 8).
159. The Council will continue to work closely with Cardiff schools and with its partners, including those on the Admissions Forum and the Welsh Education Forum, to ensure that the published admission arrangements do not directly or indirectly discriminate against any pupil.

### **RECOMMENDATIONS**

Cabinet is recommend to

1. determine the attached Council's draft School Admission Arrangements 2021/2022 as set out in the Admission Policy 2021/2022.
2. note that the School Admission Arrangements 2021/2022 implement Option A for changes to Welsh-medium primary school catchment areas, as set out in the Welsh-medium catchment areas Consultation Document (Appendix 2).
3. note the transfer of the primary school catchment area of Ysgol Glan Morfa from the secondary school catchment area of Ysgol Gyfun Gymraeg Glantaf to the catchment area of Ysgol Gyfun Gymraeg Bro Eder.
4. note the deferral of the proposed changes to the secondary school catchment areas of Ysgol Gyfun Gymraeg Glantaf and Ysgol Gyfun Gymraeg Plasmawr in Canton and Riverside.
5. note that the Council expects to consult on further revisions to Welsh-medium secondary school catchment areas in Canton and Riverside, in the 2024/2025 academic year, for implementation in the 2026/2027 academic year.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Nick Batchelar</b> <b>Director of Education and Lifelong</b>
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	<b>Learning</b>
	13 March 2020

*The following appendices are attached:*

Appendix 1 – Draft School Admissions Policy 2021/22 (as issued for consultation)

Appendix 2 – Welsh-medium primary and secondary school catchment areas consultation document

Appendix 3 – Formal responses

Appendix 4 – Notes of meetings with pupils

Appendix 5 – Appraisal of pupils' views

Appendix 6 – Summary and appraisal of consultation responses

Appendix 7 – School Admissions Policy 2021/22

Appendix 8 - Equality Impact Assessment