



31st January 2025

## **Response to consultation on changes to admissions arrangements 2026/27**

As a board of Governors and Headteacher of Blatchington Mill School ('the School'), we wish to take this opportunity to respond to Brighton and Hove City Council's ('the Local Authority') current consultation, in respect of school admission arrangements in the city, from September 2026.

The consultation encompasses several elements, including changes to Published Admission Numbers (PAN), catchment areas, school preferences, and admission priorities.

### **Blatchington Mill School**

Blatchington Mill School is a thriving and welcoming community school, underpinned by an ethos of celebrating both inclusivity and diversity, which supports every child to feel they belong here. We are focused on securing the best possible experiences and outcomes for all our students and our recent exam results reflect this drive for excellence in all we do. This is particularly key for our students in receipt of pupil premium funding, where we have continually narrowed the gap in their attainment and progress with their peers, demonstrating that all our students are able to achieve well as a result of our high quality teaching and learning. Our pastoral care, personal development and opportunities to experience life beyond the classroom are also critical to us, supporting our students to become confident, articulate, kind and compassionate members of society.

Our school currently has 1637 students on roll and we are full in Year 7. 21% of our students are in receipt of Free School Meals, a rise of 8% in the last three years, and 17% of our students have Special Educational Needs and Disabilities ('SEND'), with 2% of our students having Education, Health and Care Plans.

A significant majority of our students come from our catchment area and we have strong relationships with our local schools, including our feeder primaries, which are key in supporting our incoming Year 7s each year to settle effectively into our school.

### **General Statement and Key Observations**

The Local Authority's consultation represents significant changes to the city's education landscape. It is ambitious, complex and of importance in its aims, scope and stated outcomes.

The school recognises the Local Authority's efforts to champion access to secondary school education, promote inclusive and diverse schools, reduce inequality and disadvantage, and improve attainment and outcomes for all. We support the ethos of collaboration and partnership, and of working together to provide families with a good choice of schools that meet their child's needs in the city.

Given the significance of the consultation, we believe it is important that the Local Authority ensures it provides clear and relevant information that is easily accessible, understandable, and as far as possible evidence based. It is also important that it sets out how the proposals support its stated aims, as well as the consequences, implications and impact they have on schools, families, staff and, above all, children.

In various ways, these aspects have not been as robustly supported as they might and have resulted in unnecessary confusion and concern from stakeholders, notably families and carers. No doubt, post the conclusion of the consultation there will be an opportunity for reflection and learning for all those concerned in the city's education provision that may underpin future consultations and discourse.

The consultation is a citywide process and presents an opportunity for a genuinely constructive conversation on addressing a range of important areas, especially educational disadvantage. However, it is our observation that much of the focus, discussion and debate was skewed to the centre and east of Brighton, and there was a missed opportunity to embrace the whole city, especially Hove and Portslade.

As such, the level of engagement, especially with families and carers of children in Key Stage 1 and 2 within our catchment was not as high as we would have liked or appropriate for such a significant consultation. It will be interesting to see how this is reflected in the responses garnered via the 'school admission arrangements public consultation Your Voice platform'.

However, we recognise and applaud the efforts made by many in the last two weeks to address this, including the Local Authority's decision to host a successful in-person session at our school on the 14 January 2025, and one hosted at St Richard's Community Centre by the Hangleton & Knoll Project on the 25 January 2025.

There now follows detailed observations and responses to the specific areas raised in the consultation.

### **Published Admission Numbers (PAN)**

As stated above, the Local Authority's consultation includes a proposal to reduce the School's PAN from 330 to 300 students, for September 2026.

Whilst the Governing body are and remain sympathetic to the changing demographics and the differing attainment levels achieved across the city, its focus, as a matter of law, needs to be upon the current and future students of the school, for the reasons set out below.

### Governors' statutory responsibilities regarding admission changes


When considering the proposals, Governors are bound by their statutory obligations, including under the Education Act 2002, section 21(2)<sup>1</sup>, which, for ease states as follows:

*“The governing body shall conduct the school with a view to promoting high standards of educational achievement at the school.”*

The latest independent and objective data available to Governors to assess the School's standard of educational achievement is the provisional school performance data, published in December 2024<sup>2</sup> and due to be finalised after the conclusion of the consultation in February 2025.

Below is an extract showing the school's Progress 8 and Attainment 8 scores:

#### Progress 8

Banding	<b>ABOVE AVERAGE</b>
Score	0.3
Confidence interval 	0.13 to 0.46

#### Attainment 8



Based upon these measures and the corresponding guidance, it is clear that the School is promoting high standards of educational achievement, over and above those of the national average and local authority average and Governors therefore need to be mindful of whether the proposed reduction in the PAN would impact upon the School's ability to maintain this level of attainment for those students currently in the school and also limit access for future students.

Further, The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013<sup>3</sup> places the following obligations, in section 6(1), onto Governors, regarding the School's finances:

*“The functions of the governing body include the following core functions –*

...

<sup>1</sup>[https://www.legislation.gov.uk/ukpga/2002/32/section/21#:~:text=21%20General%20responsibility%20for%20conduct%20of%20school&text=\(1\)Subject%20to%20any%20other,educational%20achievement%20at%20the%20school](https://www.legislation.gov.uk/ukpga/2002/32/section/21#:~:text=21%20General%20responsibility%20for%20conduct%20of%20school&text=(1)Subject%20to%20any%20other,educational%20achievement%20at%20the%20school)

<sup>2</sup><https://www.compare-school-performance.service.gov.uk/school/114606/blatchington-mill-school/secondary>

<sup>3</sup> <https://www.legislation.gov.uk/uksi/2013/1624/regulation/6/made>

*(c) ensuring the sound, proper and effective use of the school's financial resources."*

In this regard, the Governors are assisted by the School Resource Management Adviser Comprehensive Report, carried out jointly for the School and the Council, between 24 October 2024 and 13 December 2024.

The background to this report is that, "...[t]his review was requested following an ESFA pro-active offer to the LA (ESCC). Both ESCC and the school have welcomed this offer.."

Given its timing, the report's author specifically addresses the financial impact of the proposed reduction in PAN. The full passage is set out below for ease:

*"The pupil numbers forecast reflect current demand for places. Recruitment is expected to meet near capacity of 330 pupils (PAN since 2018) for each year forecast (up to 2027 currently).*

*A proposal to reduce the PAN to 300 has been voiced by the LA as a strategy to distribute pupils to other schools with falling rolls. The school would need to undertake a full analysis on how to operate to a balanced budget with a reduced PAN, and the first step to allow this analysis is to agree on a model that operates to a balanced budget with the current PAN, as reducing PAN by 30 pupils would see income reduce by approximately £180K p.a. with a related teacher/TA staffing reduction unlikely to offset this income reduction. The net capacity of the school is calculated at 2016, therefore any reduction would create further economy of scale challenges around the maintenance of the premises."*

Given the stark financial warnings issued by the School Resource Management Adviser, the School's finance committee voted unanimously on 13 January 2025, opposing the proposed reduction to the PAN number. This vote was ratified, unanimously, by the full Governing body in its meeting on 23 January 2025.

For the reasons stated above, the Governors of the School oppose the proposal for the 2026/27 academic year to reduce the PAN and ask that the council follows the guidance provided by the School Resource Management Adviser.

The Governors would ask the Council to reconsider its proposal, especially given the impact it would have on the School's immediate community with the announced possibility of consolidating Hove Park into a single site.

Whilst this response focuses on the discharge of statutory obligations imposed upon the Governors, they would wish to also acknowledge the strong opposition, sentiment and feeling held across the community in relation to the proposals, many from families and carers who have centred their work and lives around getting their children into their school of choice.

## **Catchment Areas**

The consultation proposes no changes to our catchment area, and as such we have no comment to make. We defer to other schools who are impacted by catchment changes to express their considered and respective views.

## **School Preferences**

We support the consultation proposals to increase the number of secondary school preferences from three to four. We acknowledge this change is part of a proposal to improve the school admissions process, although we have concerns as to whether this aspect of the consultation is widely understood.

## **Proposed Admission Priorities**

The consultation sets out an expanded number of secondary school admission priorities and our views are as follows:

**Priority 1** i.e. 'Looked after children and all previously looked after children, including those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted' and **Priority 2** i.e. 'Compelling medical or other exceptional reasons for attending the school' are appropriate and supported.

However, the latter does give rise to our concerns over the lack of consideration of students with requirements relating to SEND. In our view this has not been adequately reflected in the consultation nor the impact the proposals may have on them or their families.

We are aware this has left many families and carers deeply concerned and while there have been several in person sessions ostensibly focused on SEND and in partnership with the Parent Carer's Council (PaCC), these have been later in the consultation process, including an in-person session at the Jubilee Library on the 11 January 2025 with a slightly amended presentation, and a series of sessions with Councillor Emma Daniel (Cabinet Member for Children, Families, Youth Services and for Ending Violence against Women and Girls) for families with children with additional needs.

It is evident they raised more questions and concerns than have been answered and resolved. They also highlighted the concerns held by many families in the city and our catchment who do not yet have a formal diagnosis or EHCP and how the proposals apply to them.

As of a week ago, it was our understanding that Priority 2 of the proposed secondary school priorities would have limited scope of application in this regard. However, we understand that in the last few days, as part of an online session in partnership with PaCC

on the 28 January 2025, the Local Authority has presented revised materials that seek to set out Priority 2 as 'relevant' to SEND communities, and that its application will be bolstered by a 'multi-disciplinary panel.'

While the rationale for such materials is understood, we understand that the details of the application of Priority 2, especially eligibility and process will not be made available until the approved admission arrangements are published. Understandably families and schools will be concerned to understand how this expanded interpretation of Priority 2 is to be applied and how it will interplay with the other stated priorities.

As a school we are concerned whether the Local Authority has the requisite resources and bandwidth to provide the necessary level of support for families proceeding under this priority. We will also wish to know how this will impact our own resource decisions in order to provide the appropriate level of support and provision to children and their families, as well as the implications for any capital investment, enhancement of offering, teaching and support staff and expertise needed.

**Priority 3** sets out 'A sibling link applied for those living within the designated catchment area only.' This is consistent with current arrangements, although based on our presence at various in person and online consultation sessions, our concern is that its scope and application for those families out of catchment is not always clearly understood.

We recognise and support the Local Authority's pioneering efforts in partnership with other groups, to put in place higher priority for children eligible for Free School Meals (FSM) when choosing secondary school places for 2025. We likewise endorse the prioritisation of places for such children for 2026 and set out in the consultation under **Priority 4 and 5** i.e. 'Children living within the designated catchment area and eligible for Free School Meals up to the city average', and 'Other children eligible for Free School Meals up to the city average.'

This is a progressive and potentially profoundly important provision, and we support the proposal to change the admission criteria to allow for 30% of the school's total number of places to be allocated to students with Free School Meals (FSM) from across the city. That said, it has been unfortunate on several occasions that the application of the FSM allocation under the proposals has required clarification and considerable explanation. This highlights the complex nature of the proposals and concerns that they are not easily or readily understood by all.

Likewise, we are not alone in seeking guidance from the Local Authority as to how and when the city average will be reviewed. This is to ensure that the appropriate decisions on resources and provision are made in a timely and impactful manner. We are also mindful that FSM allocations are not just numbers but children and we are committed to ensuring that we support all students allocated a place at Blatchington Mill to transition effectively to our school, giving them the best chance to thrive as part of our community.

As a school we are very aware that within our catchment are areas of chronic poverty and deprivation in the top, second and third decile of deprivation and comparable to other parts of the city<sup>4</sup>. While we may be in a two-school catchment it is important that this socio-economic reality is recognised and supported in the consultation process and discussion and a reminder of the need to approach disadvantage at a city level, which has been lacking to date.

It also raises the concern that children who are not eligible for FSM, but nonetheless experience financial deprivation just above eligibility thresholds, are not further disadvantaged by the proposals. This has been put forward by several schools, and we believe the Local Authority is well aware of the implications of this.

**Priority 6** i.e. 'Children living outside the school's catchment area but within the catchment area for BACA, PACA, Patcham or Longhill up to 20%' is a new priority and unfortunately a controversial one. As a school we recognise the Local Authority's ambition to provide choice to families in a single school catchment area and enable them to have more than one option as their first choice.

Unfortunately, the proposal underscores the reality that the city does not have true equity in the secondary education provision, given that the proposal does not include all schools. Academy trusts and faith schools are not included though they are clearly an important and valuable part of the in catchment offering. As such, the proposal will place a disproportionate impact on community schools under the control of the Local Authority.

The Local Authority's own calculations set out that 57 students in our catchment would be required to travel to a school outside of the catchment. We recognise that as with any modelling there is certain flex in the numbers, and while the Local Authority has avoided expressing the possible implication in terms of probability, likelihood or percentages, it is clear that for some families there is the possibility they would not be able to send their child to the school, despite it being nearby or an expressed preference.

We are aware this effect has been at the centre of discussions in other areas of the city from last December. However, in our view due to relatively low engagement in our catchment, it has only recently been a focus of consideration for families and so far, the response has not been positive and we do not believe fully understood. We are particularly concerned as to how this may impact those children not eligible for FSM but who experience disadvantage and those families and carers with children with additional needs seeking clarity under Priority 2. There is a risk that those already facing disadvantage may be subject to further disadvantage.

We are not alone in raising concerns over the lack of information or guidance on the Local Authority's transport policy. While we are advised it is under consideration, we can only

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<sup>4</sup> [https://mapmaker.cdrc.ac.uk/?d=11110000&m=imdh19\\_dc&lon=-0.1515&lat=50.8405&zoom=12.31](https://mapmaker.cdrc.ac.uk/?d=11110000&m=imdh19_dc&lon=-0.1515&lat=50.8405&zoom=12.31)



revert on the proposals as they stand, and the failure to have had clarity on this at the start of the consultation has created inevitable concerns for all schools.

We recognise that not all students are able to walk to school or indeed any school. However, any proposal that has as part of its composition the intended or expected impact of increasing the distance to school for children is problematic. We believe the Local Authority is well aware of the issues including attendance, belonging, wellbeing and environmental impact this creates and the potential inconsistencies that arise with its own stated policies and ambitions on these areas.

After considerable discussion, and varying views within the Full Board of Governors, the final consensus was that we could not support priority 6 as presented. We would encourage the Local Authority to hold off including this as part of its proposals and encourage it to ensure the other priorities are successfully and effectively applied, especially those relating to FSM which have garnered citywide support.

We believe that the Local Authority understands this, and the need for schools to follow their strategic plans within their already stretched financial means. We recognise that our rejection of priority 6 along with other voices in the city, will be of great disappointment to many.

As such, we would encourage the Local Authority to actively engage with schools as part of a refocused conversation on 'one city' and 'the city child', once it is in a position to provide costed assurances on travel, mechanisms for collective responsibility of all schools in all catchments, a city wide focus on disadvantage, and above all a more considered assessment of the impact of existing proposals as well as any that an open admissions policy would create.

On the final **Priority 7 and 8** i.e. 'Pupils living in the designated catchment area for the school(s)' and 'Other children' the School supports the proposal, although we have concerns as to whether this aspect of the consultation is widely understood, especially by those families and carers in catchment with children in primary school education who do not fall under priorities 1 to 5 and in particular are not eligible for FSM, have no additional needs, or sibling link and who could be adversely impacted by Priority 6 if that was approved.

### **Blatchington Mill School's Commitment to Partnership and Sustainable Change**

Blatchington Mill School remains committed to collaboration and partnership in shaping an equitable and sustainable education system for the city. We value the ongoing engagement between schools, the Local Authority, and our wider community, and we believe that meaningful dialogue is crucial to ensuring that any changes implemented serve the best interests of all students, current and prospective.

We acknowledge that change is now an inherent part of the evolving educational landscape. However, for change to be truly effective, it must be thoughtfully planned and



progressively applied to maintain a viable, high-quality education system. This requires careful consideration of capacity, resources, and the ability of both schools and the Local Authority to deliver the necessary support for students, staff, families and carers.

As we move forward, we urge the Local Authority to ensure that policy decisions remain guided by clear evidence, transparent communication, and a shared commitment to providing the best possible opportunities for all students in the city. We look forward to continued collaboration and constructive discussion to achieve these aims.

**Kate Claydon**, Headteacher, Blatchington Mill School

**James Henderson**, Co-Chair of Governors, Blatchington Mill School

**James Tulley**, Co-Chair of Governors, Blatchington Mill School

**Tim Shutler**, Vice Chair of Governors, Blatchington Mill School