

# PaCC Report: Secondary school admission arrangements



This is a report from the Parent Carers Council (PaCC) for Brighton and Hove City Council (BHCC), following their engagement exercise (October 2024, from page 1) and full consultation (January 2025, from page 3) about secondary school arrangements in Brighton and Hove.

This report captures the key themes and minutes from parent carer community engagement.

## Engagement Exercise - October 2024

### Introduction:

Parents are aware and concerned about the challenges related to the achievement gap and the lack of access to quality education in Brighton. However, they are frustrated by the narrow focus of discussions, of BHCC's engagement process, which seem to address only a few issues while not taking into consideration other wider issues.

This engagement exercise does not consider the needs of children with SEND accessing mainstream schools. For children with SEND, transitions are already stressful, and many struggle with crowded environments, public transport, and the overall busyness of the outside world. To date there has been no consideration as to how proposed changes will impact children with SEND risks exacerbating existing pressures, including the strain on mental health services, which are already overwhelmed.

- Many families feel decisions are being made behind closed doors, with little clarity or transparency. They call for more explicit reasoning and evidence before further changes are rushed through.

PaCC is aware of the limited co-production to date with BHCC and local authority officers in these discussions. There is a strong feeling, not only within the SEND community in Brighton & Hove but also in the wider parent community; namely that the challenges and needs of children with SEND have not been adequately considered.

- We urge BHCC to adopt a more collaborative approach with PaCC moving forward, ensuring that the voices of SEND families are included within future discussions and decision-making processes.

### Travel Concerns:

The prospect of long commutes for children with SEND is a particular concern for parent carers. Many may face complex bus journeys across Brighton, with some routes taking over an hour each way. Parent carers feel this would be both

unnecessary and harmful, when there maybe schools within walking distance. They highlighted that many children with SEND would struggle cognitively and emotionally with extended travel, becoming confused by unfamiliar routes, forgetting to take care of essentials like school bags over an extended period, and facing social and emotional challenges throughout the journey.

Parents worry that their children, exhausted by long commutes, will struggle to focus on homework or have any energy left for family time. Anxiety, emotional distress, and meltdowns are almost certain to follow as families struggle to manage their children's mental health on top of the increased travel burden.

PaCC are aware that children with SEND in the east of the city are already having to travel long distances to and from school, highlighting the need for this issue to become a priority for Brighton & Hove City Council (BHCC).

- The current situation demonstrates the urgent need for the council to focus on reducing travel times for vulnerable children, particularly those with SEND.

### **Children Without an EHCP:**

Parents are particularly concerned about children with SEND who do not have an Education, Health, and Care Plan (EHCP), as these children's needs are not considered in the proposed changes. Choice is vital for all children, but parent carers report that the council has stated they will only assist children with an EHCP, leaving others to manage alone. This lack of support excludes a large number of children with SEND who are not yet diagnosed or do not meet the criteria for an EHCP.

Parents are concerned that their child might need full travel assistance, due to their combined SEND/anxieties, but not be able to access it without having the reinforcement of an EHCP.

- PaCC strongly feel that these challenges must be taken into account in all future discussions and decisions.
- The system is already struggling to process EHCP applications. Children with SEND not being able to access mainstream secondary provision could risk an increase in demand for EHCPs, potentially leading to longer delays and further disadvantaging those who desperately need support.

### **Friendship Groups:**

Another major concern for parent carers is the potential impact on children's social lives. The possibility of being sent to a school far from their friendship group is troubling for many families, as these bonds provide critical emotional support. Key friendships act as a critical transition scaffold for learners with SEND.

- Opportunity for children to build and maintain friendship is paramount for their mental health and wellbeing, it does need to be taken into account

## Accessibility of Information:

Parents have expressed concerns that the format of the information, documents, and the survey provided by the council was not accessible for some parent carers. This created additional barriers for families who already face challenges in engaging with formal processes, especially within the SEND community.

- Ensuring that future communications and consultations are accessible and inclusive is crucial to allow all parents to participate meaningfully in these important discussions.

## Parent Statements: Impact on Children With SEND:

*“My daughter hides her anxiety in public but is often overwhelmed at home. She finds transitions into new situations incredibly difficult, and the thought of long, crowded bus journeys to a new school is already causing her distress. She suffers from anxiety and self-harms at the beginning of each school term. How will she cope with two hours of travel every day, less sleep, and being separated from her supportive friends?”*

*“My daughter has finally made a close group of friends, and it’s one of the main reasons she enjoys school. I’m extremely worried about the effect it will have on her if she’s separated from them under these new catchment proposals.”*

*“My son was separated from his friends when he moved from nursery to school, and again from infant to junior school. The anxiety and emotional distress that caused him was heart breaking, and we’re still dealing with the fallout over a year later. If he’s forced to attend a secondary school without his friends, it will be devastating for him.”*

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## Consultation - January 2025

This addition to the report is in response to the consultation launched by Brighton & Hove City Council in November 2024 around proposals to change secondary school admission arrangements.

During the consultation period, PaCC has received feedback from parent carers through email and at two listening events that we facilitated with BHCC officers.

There are mixed views within the parent carer community about the proposals. Some parent carers have shared concerns that the current system limits their choice of school for their child with SEND, particularly those living in a single school catchment area. They welcome the opportunity to express a preference for a school that best meets their child's needs, which the new proposals would allow.

Children with SEND already travel long distances across the city on public transport to attend a school that is outside of their catchment area. We know from parent carer feedback that this is working well for some children and they are progressing well at school, but for others, their children with SEND are struggling. Whatever the outcome of the proposals, Brighton & Hove City Council must find a solution to ensure school placements do not place undue strain on children with SEND, young carers and their families.

PaCC represents all parent carers in the city and, as such, does not take a position on whether the proposals should be approved or not. Our focus is on ensuring that children with SEND and their families receive the best possible education and support and that the feedback we have received by parent carers is heard by BHCC Councillors and officers.

PaCC thank the BHCC officers who attended the listening events and provided responses to parent carer feedback. Full details of these can be found in the meeting notes at the end of the report, from page 7.

PaCC acknowledge that some of the City's schools have stated concerns about the likely detrimental impact on their pupils who have SEND and on them in terms of being stretched to manage successful transitions.

### **Parent Carer Feedback on the Consultation Proposals**

Attendees were expecting specific SEND data and were concerned that it wasn't available at the in person event, especially for events that were specifically designated to address SEND matters. Further information was made available by the Local Authority at the online event.

The following themes emerged from parent carers during our two listening events and from emails we have received:

#### **Complexity and Lack of Clarity**

- Parents found the proposals difficult to understand, making it hard to assess the impact on their child.
- Unclear explanations on how the 20% school place allocation will work, with concerns that SEND children in single school catchments may be disadvantaged.
- Confusion around increasing preferences from three to four—some parents felt this wouldn't necessarily improve their child's school options.

#### **Inequity in Priority 2 Admissions**

- Priority 2 criteria is unclear and is likely to exclude many SEND children, especially those without an EHCP.
- Families with financial resources (who can afford private assessments) could be at an advantage in securing Priority 2 placements.
- Will young carers be given Priority 2 status, because of their additional responsibilities at home?
- Concerns over the appeals process, with parents questioning why SENCOs cannot verify a child's needs directly instead of relying on a panel process.

#### **Transport**

- Transport concerns have remained a significant theme throughout the consultation.
- It is an as yet unanswered concern that even if provided with a bus pass, students will be ground down over time by the ordeal of a twice daily journey - 'child commuter burn out' that could trigger EBSA.

#### **Impact on Children With SEND and Families**

- Reduction in available school places at Longhill, Blatchington Mill, and Dorothy Stringer will increase competition, making it harder for children with SEND to access appropriate school placements.

- Children who need stability and routine may be forced to move away from key peer groups, increasing anxiety, disengagement, and difficulties with school attendance.
- Parents of children with EHCPs worry that the proposals could impact on their children's friendship groups when starting secondary school, especially compounded for them as they experience barriers with creating friendships.

### **Accessibility and Equity Concerns**

- Transport barriers—some children with SEND cannot travel long distances, especially those with anxiety, sensory processing difficulties, or mobility needs.
- Free School Meal (FSM) and SEND pupils' placement priorities remain unclear under the 20% allocation system.
- The changes do not consider the need for reasonable adjustments, such as ensuring children are placed near key friends or support networks.

### **Safety and Mental Health Risks**

- Parents fear that the separation of autistic children from stable friendship groups will negatively impact their emotional regulation and mental health.
- Increased uncertainty around school placements could make transitions harder, particularly for neurodivergent children who need structured, predictable environments.
- EBSA and self-harm risks—some parents shared experiences of their child experiencing distress when forced into unsuitable school placements.

### **Parental Burnout and Emotional Toll**

- Parents described exhaustion from constantly fighting for SEND support, which would worsen under the proposed system.
- The consultation process felt overwhelming, leaving parents feeling excluded from meaningful participation.
- Some families are considering moving out of the city if they cannot secure an appropriate school placement.

### **Fractured SEND Community**

- The proposals risk breaking up SEND support networks, making it harder for children to access peer-led emotional and social support.
- Some parents fear that the system will create more competition between SEND families, particularly for limited Priority 2 placements.
- Parent carers referred to this consultation process as 'divisive' within the SEND community, causing cracks in a usually close knit community. As parent carers rely so much on their peer support network, this has been doubly impactful.

### **Lack of Transparency and Trust in the Process**

- Parents lack confidence in the decision-making process, feeling that SEND needs were not properly assessed before proposals were developed.
- The SEND impact assessment is not detailed enough, raising concerns that key issues are being ignored.
- The panel process for Priority 2 applications may be overwhelmed, leading to inconsistencies in decision-making.

### **Loss of Stability and Certainty**

- Parents say they need at least 18 months' notice to prepare their child for school transitions, but the current system provides certainty only six months before.
- Unpredictability in the new system is particularly problematic for autistic children who rely on structure and routine.

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## Suggestions From Parent Carers

In addition to concerns, parent carers shared key recommendations on what would improve the system:

- Ensure every child has a priority placement somewhere. Some children—particularly autistic children without sibling links—could be left without priority at any school, leaving families in a highly uncertain position.
- Modify the tie-break system to improve fairness. Random allocation could unintentionally displace children far from home. Alternative tie-breakers, such as prioritising children on pupil premium before applying distance or random allocation, should be explored.
- Improve certainty for families to allow for better planning. The proposals introduce significant unpredictability, making it difficult for families to plan school transitions. SEND families need at least 18 months' notice to ensure a smooth transition.
- Reassess school placements and capacity based on location needs. The current distribution of secondary schools does not meet the geographic needs of the city. Some parents suggested lobbying for new school provisions in areas with high demand, rather than requiring long-distance travel due to school reductions.
- Clarify Priority 2 admissions—ensuring that young carers and children with significant but undiagnosed SEND needs are included.
- Increase transparency on the 20% allocation process, particularly regarding FSM and children with SEND.
- Guarantee that all children with SEND are a priority group, not just those with EHCPs.
- Ensure peer group stability for autistic children, recognising that friendship loss can be devastating.
- Improve consultation and co-production—SEND families, SENCOs, and school leaders must be included before final decisions are made.

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## Final Request to Decision-Makers

PaCC asks all Councillors to ensure that sufficient time is given to debate the feedback from parent carers and that the needs of children with SEND remain at the heart of the decision-making process.

PaCC welcome any communication on any of the issues contained in this report. You can contact us by emailing PaCC at [admin@paccbrighton.org.uk](mailto:admin@paccbrighton.org.uk) or by calling **01273 234862**

The Parent Carers' Council (PaCC) is a parent-led forum, which represents parent carers with children and young people with any kind of physical disability, learning disability, complex or long-term medical/health condition, or special educational need. The group was formed to enable parent carers to work closely together to help improve services and support. It aims to help parents get more directly involved in the strategic delivery of services for disabled children in Brighton & Hove.

The forum has over 680 members. This position statement was developed through consultation with our members, our Steering Group and our partner groups: Brighton Pebbles, mASCot, T21, Amaze parent groups and befriending (PGB), Fresh Youth Perspectives, Dads Group and Children's Hearing Services Working Group (CHSWG).

Find out more here <https://paccbrighton.org.uk/>

*Notes from PaCC parent carer in person listening event, 23<sup>rd</sup> January 2025*

*Transcript from PaCC parent carer online listening event, 28<sup>th</sup> January 2025*

### **PaCC In Person Listening Event – Wednesday 22<sup>nd</sup> January 2025**

Presentation by Local Authority. Questions/comments asked by parent carers after presentation and before feedback session:

- What are the numbers for those with SEND that also are entitled to FSM?
- Why did the presentation not more SEND focused for the audience to show the numbers of SEND children and young people affected? This is a SEND specific session and information should have been tailored to the audience. This is the same old presentation that is being shown to others – where is the lens of SEND?
- At the online meeting next week, can we have the above data presented?
- There needs to be some due diligence on FSM cohort
- What figures have you seen that indicate that this is a good proposal?
- There may be a large number of FSM children will have SEND but will be undiagnosed.
- Assess, Plan, Do, Review – parents/carers know that this is the process, but schools are not carrying this out and there is no accountability. Schools are not following these pathways and graduated processes.
- Why do you think that this is going to deliver anything for the SEND community? Is it levelling up for SEND children and young people?

### ***Feedback From Parent Carers:***

- Very confusing, multi-layered, hard to see what would impact what and hard to understand.
- Need clearer proposals, around the 20% and FSM, how can you have any input if you don't know the impact?
- A lot of children and young people don't need an EHCP, they need support in the behaviour policies. A child/young person that is "just coping" and will then find themselves separate from friendship groups is a massive safeguarding situation (self-harm of child/young person). Self-harm policies.
- Some schools offer after school clubs for revision for exams, if parents/carers don't have transport then it is not accessible for young people to access.
- Community is a massive feature in SEND, parents/carers just want child/young person to be happy.
- EHCPs and naming schools as placements – not able to understand the preferences of friends and where they are likely to go so unsure what to put on EHCP.

- Choice over community – in that case choice impacts mental health.
- School refuser – LA not interested in doing anything. Offered timeslots to try and show that young person is going to school. Parent/carer takes an Uber to the school, waits until the young person is completely distressed and then takes an Uber back home again. Parent/carer then must ask the school to check the CCTV to show that the young person “touched the gate” but didn’t make it in. May have this situation with another child and have to do this with both – how is this going to be manageable when neither parent drives?
- Child/young person may have the ability to go to a Special School but if take this option then will lose sibling link.
- Parent guidance on Priority 2 – will that come before parents/carers have to make a decision? What do parents need to qualify under Priority 2? In the past never had the “right” paperwork for anything.
- Didn’t go through the Appeal Process yet, offered a trial transfer to another school (where felt school was trialling young person), young person given a mainstream timetable, no accommodations for SEND, young person failed trialled transfer in Week 10. School is saying they tried but no accommodations were made. Safety net doesn’t really work. The trial transfer was where friends were, but young person couldn’t access the transfer. **RB explained that there is a panel to appeal and make a decision.** Safety net process doesn’t seem to work for people that use it. Can go through the Appeal Process, but then there are no spaces available in schools if successful. Why is the burden on SEND families to have to appeal? This is a barrier to education.
- This change in boundaries is not going to lessen the appeals. Services are struggling, SENCOs are inundated with EHCPs and still waiting for the funding for these. Child in Year 4, but school having to prioritise Year 5 and 6 (going into secondary). At secondary there is more for the child/young person to organise themselves, more pressure on the individuals and issues are exacerbated, this leads to disassociation and disengagement to education. Parents/carers apply for EHCPs in Year 4 and Year 5 as a level of protection.
- Year 3 child/young person, no diagnosis and primary school is adjusting for them, and they shadow the Caretaker for 1 hour a week, which they love. EHCP rejected, appealed and lost and now going to tribunal. Child/young person is falling behind (2 terms) and getting anxious. Hoping to be placed in a Special School but might not get a placement, also might get into a Special School and hate it. In the process of learning about schools/SENCOs and have no idea how this will affect options and scared of how this will affect options.

#### **What would help:**

- Want to understand the impact so that parents/carers can prepare.
- No one knows the rules of the game (random allocations etc). If you live in a catchment area you still don’t know if you have managed to get into the catchment school until 6 months before child/young person goes, so still can’t prepare them for that transition. Currently son knows where is going and is still anxious about the move and the situation, how will daughter with SEND cope with this?
- Looking around secondary schools everywhere, this proposal has the potential to rip everything apart, so looking at all schools. Schools looking at now won’t be the same school when child/young person goes. Schools are having to be reactive to cohorts and this is a bit more confusion to add to it all.
- Lack of SEND in consultation when looking at disadvantage.
- No provision for SEND, other than those with an EHCP.
- Disadvantage from FSM but need to look at it from other lenses as well.
- All those in discussion have similar but different problems – there is not a “one size fits all” the offer needs to be more bespoke.
- Government is looking at SEND, can’t the LA wait until those policies come in to look at it all rather than look at it now and then have to look again when SEND Central Government advice/guidance is released?
- Year 6 currently in Specialist Primary – might not transfer in Year 7, but might transfer in Year 9 – will they be able to transfer? **Local Authority: Yes will have guidance on Priority 2.**
- Priority 2 may pit communities against each other (i.e. the SEND community).



- Where is the proposal to add ASC resources to schools and which schools are they? Would be useful to know.
- Travel is a concern (with masking).
- Priority 2: Daughter has non-SEND friends, so no certainty on what schools as wouldn't know what school they go to (friends are lone or elder children).
- First born, SL&C difficulties, Covid – child/young person has 2 close friends who offer a friendship/carer role. These friends have no sibling links, likely that closest friends won't be at the same schools as daughter. This will result in loneliness, lack of peer support, without friendship group the daughter wouldn't be able to regulate.
- SEND lower than disadvantaged for attainment. Why is disadvantaged not including SEND?

**Solutions:**

- Parents/carers are giving up jobs, child/young person is parent/carer job. Would consider homeschooling. Currently get called into school three times a week, so feel like homeschooling would be the only option (although aware of the issues around isolation, social interaction etc).
- TAs working with SEND often have child/young person with SEND themselves. TAs may find themselves in similar situation where they have to give up work.
- Butterfly effect of not fulfilling graduated process (in school) is that there are lots more issues and costs.
- Why can't the 30% (144 children, young people) be a sliding scale?
- What about twins? (1 with SEND and 1 without)?
- Go through all the permutations – show raw material to make it more meaningful. Doesn't feel like the Council has all the data to lay out the connotations/impacts and the ramifications are not thought through.
- Due diligence needs to be done on the raw data – a reliable impact assessment.
- Change the proposals to give people the same level of assurity that they have currently got.
- Has the economic proposal of more legal challenges and EHCPs been considered?
- Council needs to consider its Equalities Duty (Equality Act 2010) to ensure that they adequately consider protective characteristics.
- SENCOs have not been approached and don't know what may be coming as a consequence of these proposals. Speak to SENCOs and co-produce with SENCOs and communities.
- More voices from SEND are needed in Scrutiny Committee. The story told was not a representative story from the SEND Community.
- One sided view is being taken forward in the narratives (on Facebook and at meetings etc.).
- Under-subscribed schools – fix the school don't bus the children/young people in.
- More pacing to Central Government needed.
- Consult with young carers, Headteachers and staff on the ground in schools (those working with children/young people).
- Not engaging parents to find out what is needed (in terms of ASC provision and resource units).
- PDA – impact on staff leaving (when schools need to make cuts because of their budget positions). Very confusing with those children/young people with PDA.
- Student voice is needed.
- Inequality of Priority 2 – those with more money to pay for assessments and those parents who can articulate better will get better results.

**Transcript of Parent Carer Online Listening Event - 28<sup>th</sup> January 2025**

Local Authority Presentation:

Some people will have sat through some of this presentation previous times.

But I don't want to take it completely for granted that people know what it is we're proposing and more information about that. So I'm just going to try and strike the right balance of giving a bit of an overview so that we're all sort of on the same page, but without going through the

whole presentation. So hopefully that'll be all right. Can you see the presentation, OK. I'm going to go with yes because I can't hear from that right. So I was just going to give a really brief overview.

Of where we're at and what we're proposing, and if anyone wants any further detail, we can go into more detail. There's not a problem with that, but I'm aware that lots of people on the call might already have delved into some of this detail already, and we really want to use most of the time for hearing from you so.

As people will know, we.

We conducted, or people may know, we conducted an engagement exercise back in October where the Council wanted to start a bit of a wider conversation about how secondary school admission arrangement arrangements could look different going forward. We got a lot of feedback from that process, including from pack and from many families.

The Council sort of went away, thought it all through and then came out with a with a proposal, a set of proposals that we're now consulting on formally.

Very broadly speaking, and this is a bit of a broad brush way of describing it, but broadly speaking, the Council is looking to explore how using admissions arrangements could help work towards solving 3 issues that we're looking at in the city. So we we've got, you know, an ongoing and now becoming quite long standing issue about.

Falling pupil numbers in the city? That's quite well rehearsed in the city we.

We talk about it every year when we come out with our admission arrangements and we are looking at how we what's available to us within our admissions arrangements to look at how we can help think about falling pupil numbers and that's where we are looking in part at some of the proposals which is around reducing the size of some of our schools and that's particularly relevant to the two larger schools in the city centre.

We also have a proposal about Longhill, but that that won't have a direct impact on how many children can go to that school, certainly not initially.

We have as a as a Council and as a city we have concerns around.

The outcomes for disadvantaged children in the city or children who are at risk of disadvantaging might have a series of factors in their life, which means they might be at risk of disadvantage at the Council when we talk about disadvantage we typically mean a really wide view on what disadvantage means. So that does include.

Children with additional needs that might include children who are of black and global majority backgrounds that might include children who are in care, lots of ranges of children when we're coming to talk about school admissions arrangements, we're going down to a more sort of technical definition of disadvantage, which is the educational disadvantage. And specifically, we're talking about free school meals within that. But we are looking at how we can think about our admissions arrangements to be.

Yeah, some of those issues in the city and the other factor that the Council is looking to explore in these proposals is about a perception about sort of choice and opportunity that there is in the city, so.

That we have some catchment areas with two schools in and we have some catchment areas with one school in and whether we can use our admission arrangements to look at whether we can offer.

A levelling up, as people have said, of some of that opportunity within the city.

So they're the sort of broadly, broadly speaking, the factors that we're trying to think about addressing partly through use of our admission arrangements as a Council.

There are five proposals that we're making, one of which involves.

Increasing the published submission number at one of our primary schools in the city that's in Woodingdean I'm just going to make the assumption that we're not really here to talk about that in great detail tonight. If anyone does want to talk about it, we can do.

But I think we probably want to get onto to the other points really. So we'll just sort of park that

one, but that is one of the proposals that we're making.

We're looking to make changes to the catchment area boundaries in a little in a in a part of the city. So where the line comes down between the Longhill catchment area and the Dorothy Stringer and Varndean catchment area, we're looking to make an amendment to that line which broadly speaking swaps around North BN25, so that's the sort of heart of Whitehawk moving them from the Longhill catchment area into Dorothy Stringer. And then the area of BN25 below that. So going into sort of Bristol estate and then down into the Kempton coastal strip, moving that catchment area from Dorothy Stringer, that area of the city from the Dorothy Stringer and Varndean catchment area into Longhill.

So that's it. That's a change that we're proposing to make.

We're looking at bringing in potentially a new criteria into our admission arrangements, which is around.

We're calling it open admissions and that's where in the proposals that we're consulting on where we would offer that opportunity for families that live in single school catchment areas. So if you live in the catchment area, BACA, Longhill or Patcham, you will be able to apply. For using that open admissions criteria at any of the Community Schools in the city, so you can't use it for Academy schools or for faith schools, they won't be offering that criteria, but we are looking at whether we offer it into our Community Schools and at the moment that's looking at a 20%. That's the proposal that we're consulting on.

We're also, I've already mentioned, we're looking at reducing proposing a reduction in the published submission numbers.

Longhill way, we're proposing a reduction of 60 places that doesn't actually at the moment impact on anyone going to that school because they don't reach that number at the moment of admissions. The reason that we are proposing that reduction is to help Long Hill with their sort of planning a bit more so they can be more secure about what the top end of the numbers might look like. We are proposing a reduction at both Blatchington Mill School and Dorothy Stringer School, both 30.

30 places each.

And so that's that's out there in our proposals.

And then finally, what we're looking to do is.

Increase the number of preferences that people have available. So at the moment in Brighton and Hove families can apply for three named schools on their application when they come to apply for primary and secondary schools. And we're looking to increase that to four.

The reason we're looking to do that is that.

We've introduced we're proposing the introduction of some new admission arrangements we've already brought in the free school meals policy that came in for this year. We're now talking about potentially bringing in an open admissions criteria and we feel that if we are offering more criteria for people to apply around, we ought to offer an increased number of preferences that families can make so that they can take the.

Opportunity, if it's relevant for them, of applying for those schools.

There's been some comments in the consultation about those. Well, all of those proposals.

But in terms of the preferences, some people have said, well, why don't you just go up to six like they have in London and some people have said, what's the point in offering me one more? You know, I want one school, I apply for one school and that's and that's what I'm interested in. So offering four preferences doesn't add anything to it, to my experience of applying for school places. So we're running that over.

The consultation is coming up to an end. It finishes on Friday.

And we do recommend that people go on to the Council engagement website called your voice and fill in the survey that's available there.

Alternatively, we can receive emails or the school admissions team can be phoned and people can talk through their submission with that team as well.

I think I was probably going to leave it there in terms of a broad brush overview of the proposals.

So just going through the data question. So basically we collect data regularly from schools and the via the school sentence and some information that information is collected 3 times a year.

The most recent census in the January census is the one where we actually collect different type of needs and the different type of. So basically, whether they've an education, health and care plan or send support. And it's the only piece of information and data collection that has that information primary need. And as I understand it, addresses and post codes.

So we are waiting at the moment for this year's to be cleaned so that we can actually use it properly and use it to look at how the spread of sent support across the city and how that will fit into the current catchment areas.

And the proposals? So, but what we do know is that.

Around 17% of the primary cohort primary school cohort is on the SEN support register and that we know that in the current year, five as a snapshot in October 2024, there were 220 children who were eligible for free school meals and on the send support register. So that's 8.9% of that year group so far.

That data percentage drops as the children get younger. Therefore, some of the SEN children will be able to be prioritised for the admission to schools via their free school meal status.

So you know, there's quite a proportion, I would say that that might be applicable too. So some examples of schools where this is over 20% is City Academy Whitehawk, Queens Park, Coombe Road, Moulsecoomb, Rudyard Kipling and Bevendean.

But there's some examples of schools where this is under 5%, that are Balfour, Downs and Standford Junior. And then we've got the schools with the highest proportion of SEN support, those are Moulsecoomb, Rudyard Kipling, Mile Oak, Coldean, Coombe Road, Bevendean, Fairlight, Carlton Hill, Queens Park and City Academy Whitehawk.

So although we know schools and then and basically the levels of sensible and education, health and care plans in our schools. We haven't at the moment got the post code up to date data which you know we would be able to provide towards the end of February,

So priority two has been much talked about and we do have this, it is relevant and it we do have this as a priority criteria within the arrangements.

So that we can ensure that specific information is taken into account and it needs to be a compelling medical or other exceptional reason for attending that school and it does need to be a specific school and it is about evidencing a specific need for a child that has to go to a specific school. So it's that one school that families feel can really need their child's needs now.

We do need independent information supporting information to make that decision.

And some of those that some of that supporting information would be in the.

Would be a paediatric report or it might be an educational psychology report, or it might be a specialist teacher report. It might be a social care report. It might be a primary mental health worker report. What we're trying to want to try and do is to capture the range of needs that might that children may have. That might make it difficult for them to attend as another school. Which is not their preferred and specified school that the family and the child feels that will meet their needs. So that's really what we're trying to identify. And we have heard from, you know, a number of parents who have spoken to us around. Their personal situations, but in general, what's coming through most is around children who are autistic, children who mask during the day, and the additional journeys at the end of each day. It'd be really quite distressing for them and be very difficult for them to to manage. So obviously we are thinking very much about, you know, being really clear around our priority to criteria and providing

further advice and guidance around that. So that parents who have these unique situations can actually be really clear about how they go forward and maybe apply under that priority. We're also looking at providing some case studies as well, and some examples of how decisions are made.

And we will be having a new panel which will have a range of disciplines sitting on it. So there will be an educational psychologist, a primary mental health worker, community paediatrician, attendance lead as well as admissions and an autism specialist as well.

And we want to also ensure that transparency about how these decisions will be made will be made clear in some published admissions arrangements, which we are going to be putting on the website.

But what I want to say is that I think what we need to do is to make sure that these are accessible for parents and so we really want to any sort of.

Information that's coming out. We want to work very closely with, with our partners in PaCC. And probably some of our Senco's to make sure that it's accessible and what we're putting out there can be understood by parents, carers and families. So what might the impact be? So it's possible under the current proposals we are consulting on that some children in priority seven might not be allocated a place in the catchment area school, but they may gain another school of preference. Some will need to be directed to school. So this will be the closest school with spaces available. And we know that some of these children, due to the random allocation where schools are oversubscribed, will be sent.

Support and all free school meals eligible.

So you know, we are hearing from families concerned about the possibility and worried about the child's needs. I've already referred to that around, you know, some of that masking behaviour, but also what's really important is around friendship groups and that's been raised a number of times, you know, having worked in send for a while, I really understand.

Those children who have.

Spent years building friendship groups of support networks within their schools, you know, and it's really important to them to go with their friends. So you know, I that also needs to be considered in the mix. So not that we're not hearing that we very much are.

So when the Council makes full proposals to a full Council at the end of January, we need to present the known information about some communities and what that impact may be on them and what mitigation so we can put in place. So we will need to do inequalities impact assessments.

We will need to be really clear about what that impact is going to be on the same Community and how we're going to mitigate those impacts.

Purpose of the yeah. And so the purpose of the consultation is, sure we add information already known to us from our data, from our send services, from PaCC's position statements and strategic work and from communications to send families to inform councillors decision making, and that will all go in. But what's most important, I think for this evening is that we hear your thoughts, concerns and questions around those proposals and what it's going to be meaning for you and your families. So.

That's really what we want to try and get some, you know, some more discussion going.

**Parent carer Question: I'm concerned that parents who can pay for the type of reports required will have an unfair advantage, as the waiting lists for support and assessment are so long**

Local Authority: In terms of the independent reports and the payment for independent reports, you know we have some time before any applications need to go in. And I do, you know, Senco's are fully aware, you know, of the Brighton Hove Inclusion Support service and we have a range of professionals in there. I think you know we have got time.

To if, if, if a family is concerned, parents are concerned to speak to their Senco and for the Senco to arrange for somebody to come from our services to do an observation assessment, speak to the family. Write a report that will help you know any gap location under priority too so you know. Please don't think that you're going to have to go out and find someone and pay for these. You know the best service are fully aware of this of the secondary admissions consultation. They know that you know these concerns have been raised. We have been speaking to them. I've been fully keeping my head of this.

Informed of developments and conversations with some parents, so I just want to like put that one to rest if I possibly can.

**Parent carer Question: Sorry, can I can I can I just challenge that a little bit? And it's, you know, I think we're talking about all sorts of different types of reports. And in terms of kind of practicality of, you know, whether it's of you know? Educational psychology or whatever it is actually get the experience you know of getting those is incredibly difficult. \*\*\*\*, you know, for a whole manner of reasons in terms of resource and the. Workload for Senco, but I don't think you can put that to one side. I think it's a very real and very live issue.**

Local Authority: Yeah. And to be, to be honest, I'm I totally agree with you. It is and you know it is going to have an additional demand on capacity, but that's not to say that we won't, you know, try and meet that try and meet that challenge and that demand if indeed these you know.

These things, these proposals go ahead, but I think we've just got to be really clear and I think we said it in previous consultations that no, in terms of these proposals, this is a genuine consultation. We might not take forward any of these proposals, some of them might go ahead, proportions of them might go ahead. All of them might go ahead. But I just, we just need to sort of, I just want to keep reiterating that because we're getting information in all the time.

We're getting lots of engagement with the communities and we are really listening to what people have to say so.

You know, and as we go through it and things are being raised, we're looking at you know what that means in terms of, you know capacity in the local authority and all sorts of other things. So just please be assured that is happening.

**Parent Carer Question: you said that you were going to do an impact assessment. So you're going to do a full send impact assessment when is that?**

Local Authority: Yeah, that will be published with the report that's going to full commit full council. So we're expecting that paper to be published around the 20th of February.

**Parent Carer Question: are you expecting more children to get in under priority 2 than previous years?**

Local Authority: That's a good question that I think we're going to struggle to give a really precise answer to. I mean it, it's fair to say that you know in the past the people that get through on priority 2 is very small like you know that that information's out there. It's something that is probably part of the conversation that's happening and the and the worry about you know is priority to really an option for my child, so certainly in the past we've seen that. The threshold, if that's the right way of describing it, there's no sort of published threshold, but the reality of gaining entry to schools through that priority is quite low in terms of the broader admissions to that school. We might be talking about, you know, two or three or four or five in in each school in each year. So it's quite a limited amount. That's partly based on, well, it's based on a number of factors, but one of them is based on our admissions

arrangements. So for example, if the admissions arrangements are that you will highly likely get a catchment area school, then it may be seen that there's it's harder to make an argument as to why you might need a particular school, especially if you've got two schools in your catchment area. But obviously if the admission arrangements change, that might change the way that that priority needs to be looked at. So I'm afraid that's really vague and really wobbly. I don't think we are necessarily. We're not planning to admit more children under that priority. We haven't built that into our modelling and our planning as such.

But clearly, as we change other parts of the system, other elements might need to change, and we're already hearing from families that they want greater clarity and transparency about that process. So that might bring about a change, which is a bit hard to predict at this stage.

**Parent Carer Question: If there are many compelling cases under option 2, more than 4 or 5 for example, how would you prioritise children?**

Local Authority: The process of allocations means that under priority 2 we would not need to prioritise them as there will be sufficient places for the number of children we would anticipate meeting that criteria.

**Parent Carer Question: will young carers be included under priority too as well?**

Local Authority: Absolutely could be included under priority too. It's exactly the sort of case that a family or circumstances that a family might have which you know you could see there could be an argument, a compelling argument around that, that child may need to go to a particular school because of their caring responsibilities they have at home with that be to a parent or to a sibling or to another relative.

That's something that would be the type of example that you would expect maybe to come forward under that priority. So yes, there's no reason why young carers wouldn't be included. But just because you're a young carer doesn't mean that you'd automatically get that priority. There still would need to be a compelling case that's supported by evidence. But yeah, that's exactly it. That's the sort of cases that we would look at.

**PaCC Question: what feedback you have around the proposals in relation to your child with send.**

Parent Carer Feedback:

1) We're, we're probably in a slightly unique situation in that our kids would definitely meet the criteria for priority one, but they also access Senco provision at their existing schools would be really concerned upon about the impacts on them through the inevitable loss of most of their peers who wouldn't be able to access their local schools at some Dorothy Stringer and Varndean anymore.

2) We've got exactly the same concerns. I think it was mentioned earlier, but the. The concept of how long as parents we plan for our children to go to secondary school, this isn't something that we will just start thinking about in September and building that community building and those friendship groups is so important to them and the thought that that is couldn't won't be there. And even if we're able to pick the school, that's right, there's so much around it. That is important and the walk to school, they're having friends, the friends that. Safety net is what will they'll be missing from what the proposed of the are putting forward and it's really, really big concern.

3) Hi, yes, I sort of echo a lot of what \*\*\*\*\* has said. So we're in a slightly different situation in that my, my daughter does have an EHCP and I feel very strongly about her being in her local community, feeling safe in her local community and people knowing her in the local

community. So if she's ever had a problem, she was out and about, people would know who she is and be able to help her. And at school her, you know, she has speech and language and communication difficulties. So making friends is incredibly challenging for her. And none of her peers have a sibling link. There are no priority group, so whilst I you know as a parent I feel very strongly about local, it's very likely that none of her very small group of friends will be going to the same school as she as she will and. That will be absolutely devastating for their hair safety net. And it's a consequence that will happen to children with EHCP and then, you know, it's not an EHCP, not a golden ticket in this scenario at all.

4) I agree with everything that's been said already, my child doesn't have any EHCP, but she has quite severe anxiety around particularly about school. And we are really worried about the transition to secondary school as a kind of point where that's going to get worse. We've had input from the Wellbeing service and we've been through an absolute nightmare trying to get her into school in the last couple of years and she's become a assistant absentee. But that's all stopped, thank goodness. And we're just reaching a point where life's got better. I've been able to go back to my career, which I had to take a break from. And I'm really scared about what's going to happen. I just think she's not going to go and I don't know what we're going to do if she has to travel that distance.

5) Yeah, just to really kind of empathise and underlying what the previous parent said there, my daughter is kind of on the cusp of an EHCP. She may not get it. But the anxiety that comes with her autism. We've been living on a knife edge of her being a, you know, persistently missing school. It is an absolute day-to-day battle to try and make that environment as safe as possible. So she continues to go to school. And it wouldn't take it would take the smallest things for that to tip in the wrong direction. And it's really just to underline that that, you know, it's that feels like there's this gap between when there's not a gap there, I suppose just online that the changes, potential changes. In terms of their impact of anxiety, they're losing their peer group is going to, you know, this is, this is life changing stuff and going down a pathway that could be really challenging and horrific and.

**Parent Carer: Just to reiterate the messages that everybody else has been saying, really I've had different, my daughter is just setting out on a diagnosis, I've had difficulty accepting that and I thought the Council would have our backs, and it doesn't feel like that.**

Local Authority: It's not necessary to have a diagnosis either. It's about the individual circumstances of children and young people and families. I just don't want people to feel like because I'm really aware there is a massive waiting list, you know, to get for, for people, for children on the pathway. So we just need to take that into account. You know, we don't want people to worry that you know, there isn't a diagnosis. You know, we do have. A team of people that are able to consider that in the round I just wanted to make that point.

Parent Carer Feedback:

6) I just want to reiterate what everyone said, especially \*\*\*\*\* actually just, I just want the Council to understand the massive effect this is having on us and families and just how hard it is being send parent anyway and the uncertainty. But it's not just the things that people are talking about now, although obviously that's really important. Like you're adding another. We don't know what's going to happen. We're trying to plan. We're looking at these schools. The makeup of these schools is going to completely change. How we don't know whether to sell our house go. Not only that, but were you stopping? SEND families supporting each other. But what I've seen recently is putting each other against each other. And now we've got



SEND families fighting for support with we used to be there for each other and now it feels like.

We're all fighting in different directions. I don't like you really breaking up this city.

And I just want to go now. I've had enough. Like the pain and the upset you're causing us when we're already dealing with so much with our kids. The effect that you're having on an already awful situation, it just feels like you don't care. Feels like I should just be under any other Council but Brighton at the moment.

7) I just wanted to reflect on something that has been said about the added stress and workload. This is adding to parents. My child has recently received diagnosis, and we've had all of the work that's gone to get to that point. We've got everything that goes with being a parent and with other child who has these additional needs and trying to work out what's best for her and how we can manage as a family.

And then on top of that, I'm having to spend my evening on calls like this. I've been down to meetings at the camp with the Council. I have no capacity for this.

But somehow I'm having to find it and the emotional stress that it's causing us on top of it, it's and I know it's not just parents of children with SEN needs. It's all the parents in the city.

It is awful. It's horrible. It's really horrible. And again, I'm saying we've, we've thought, do we need to move house? I've lived in Brighton my whole life and I'm thinking what we might have to move. We might if this doesn't help, if we're in a situation, but we're not happy with the care that our child is getting, we will have to leave.

And that is such a sad thing that we're having with it's come to.

**Parent Carer Question: I think someone said there was an Equality Impact Assessment specifically for SEND that will be done by late Feb. I just had a quick few question around that. So what organisations have been consulted as part of that? Would you be looking at? Would a sibling carer be and then all those kinds of permutations? Because you know the SEND community is massive? And you know, in like in my situation, I've got a young carer who is at reception and will be growing up to be a young carer, but there may be children who care for older siblings or adults in that household and there are so many permutations. How will you capture all of that to get a really accurate equality impact assessment? On what it will be, because it's likely that if you don't consult some of these really hard to reach groups, you won't get that information and disadvantage in the broader sense of the word would be further disadvantaged and educationally disadvantaged as well.**

Local Authority: Completing inequalities impact assessment isn't just specifically around a special educational needs. It will cover all protected characteristics that we need to consider as part of these proposals, so that that will be as broad as don't people with disabilities. So it'll be incorporated within that particular piece of work.

It is for the Council to be able to work through what it has heard about the potential impact of any changes. And to consider what that means for those proposals to consider, what potential mitigations may go against that. And to recognise those particular issues in itself, the assessment doesn't mean that proposals that may have an impact don't go forward, but they have to be articulated and considered. So we work with our own colleagues within our sort of our equalities team within the Council who supports us in being able to write specific EIA about specific proposals that the Council is putting forward across a range of decisions that are being made.

And so that's, that's the context of the documentation that goes as part of that process. I think you know, we are confident that we are capturing the views and the considerations of people about how. Different groups with those protected characteristics may be impacted by these

proposals and it'll be for us working with our colleagues to be able to accurately report on those and consider the implications and mitigations associated with that. Does it help?

Parent Carer: It does. Obviously young carers don't have protected characteristics so but that obviously is a big concern for families with SEND because they that I did have a look at the equalities impact assessment for the consultation and obviously for because that is about the consultation process, not about the proposal content as such.

I mean, young carers weren't even mentioned. So obviously my concern with a with a young emerging young carer in the household, you know, I'm quite keen to see how will you protect that, you know, vulnerable group, they are a vulnerable group, they are at risk of disadvantage. You're not legally bound to look at young carers, but it would be a nice to have to show that recognition.

Local Authority: No, it's good to say that on the form week note there is an element for carers and it does ask us as a council for these to consider age of carers etcetera. So I think there isn't. There isn't aspects of that equalities impact assessment form that we can reference young carers within even though as you say it's not a protected characteristic. So I think if he's one of those groups you know our form does go a little bit beyond just the protected characteristics take groups that are sort of legally within the Equalities Act. So yes, you know we have to reflect on that and you know we've heard those sort of concerns about young carers and how they may or may not be sort of considered under different definitions or whatever or circumstances in terms of the emission priorities already. I know there's that question around priority too. It may not be categorically just simply because a child is a young carer, that they come under priority too, it is more about the circumstances for that individual child that would have to be considered in those particular circumstances. But that isn't an immediate catch. All I you know, I totally understand. But \*\*\*\*\*, I don't know if there's anything else you're going to add.

No, I was just going to say that, yeah, the form does encourage us to look beyond just the protected characteristics. So one, one example of that is that we have a sort of local in the city agreement that will treat if someone is care experienced, as if that's a legal protected characteristic. So there is encouragement to do that. There's also encouragement within the EIA process to look at cumulative impacts as well, so.

To start to really look sort of holistically about what that might mean for a family with multiple things going on. And also to look at intersectionality of factors around a child's life. You know, a child doesn't just have SEND, do they? They have, you know, they're like football or their families from another country or all these other factors that are going on. So there is an encouragement for us to look at intersectionality and cumulative impacts as well. So trying to build up that picture of the layers.

Of impact that there might be for families in the city.

**PaCC Question: the next part is looking at kind of like solutions and what would help people with the situation that your child is currently in or thinking in terms of the proposals as well.**

Parent Carer Feedback:

8) I don't know what the solution is, but I think for me the problem is this removal of certainty? Well, not certainly like nothing was ever certain, but you know that things are put in disarray quite a lot like and. Really, I think the proposals have got to be changed to put some of that back so that people understand a lot more about the chances of where their child is likely to go to school. One of the big problems I see is the fact that the tie-break the random allocation, tie-break, and I understand why that is there, because it seemed to kind of try and make

things fairer, which I think it probably does within a catchment. But when you start about talking about displacing people outside of a catchment, you get these really weird effects going on.

Where somebody that's living next door to a school has to travel all the way across town to a completely different school like which is I think everybody would agree is just ridiculous. So I am I think I think that's got to be looked at basically like I've seen that in some of the places I think it was Oxford, somebody was telling me that they use two tie-breaks so. They do. It's pupil premium, I think. FSM, which is slightly different, isn't it? But they use that as a tie-break. First light on the priorities and then go to distance, I think. But you know, you could use random allocation after that or something, but I think there's probably quite a lot of other creative things that could be done which would mean that you don't have these really odd side effects.

And that parents would know that, you know. They could plan basically like you know. Than six months in advance before their kids start school, because that's what people need to be able to do. Like we're talking to our kids at the moment about secondary school, you know, and it's a good 18 months at least. Out like so. But it's that important to them. And when we broach the subject with our eldest because she assumed that she would probably be going to the local school with a couple of her friends like and when we broached the subject to her that, you know, she might not be going there. Like it was, it was clearly instantly very devastating to her and she was in floods of tears and all this sort of thing plight. So, you know, we need time to be able to, you know. Plan and get that kind of certainty really right. So and also can I just can I just add that there's a difference between providing? Choice people are talking a lot about people need more choice. There's a difference between that and chance. Very different things. Choice is where you decide something. A chance is where you might have a very small likelihood of it and.

Yeah, like I say, they're two very, very different things. And when you're dealing with a choice, that's a very different thing to if you're dealing with a chance, especially if you're dealing with autistic kids that need certainty and they need to plan and they need a routine and they need to be able to see things and they need, you know, to look at it and feel it. And a lot of time to transition and what this is doing is putting us between a rock and a hard place because obviously what we're worried about is.

Not being able to plan, and we're worried about. The fact that our kids friend, you know that the bedrock of their support is a lot of the time with their peers. And that's almost certainly if this goes ahead going to be broken up. But then what do we do? Oh, well, we'll have to move. But that does that too. So, you know, if we have to move, we're going to have to go through the same crap in a way, although at least we'd have a bit more control over it because of what these plans are doing is just mean have lost control. Now we don't know where the right place is, so it's that rock and a hard place of do we put them through a move where? At least we've got control. But then they'd have to find another bedrock of support. But at least we'd have control of the school a bit more. Or do we stay here and see what happens? But they'd also lose that bedrock of support. So I just. Yeah, it's. It's that removal of any sort of stability, which is so important, especially for kids that are autistic. That is the real the hardest thing to deal with.

9) Yeah, this one's sort of pick up on that, that concept of choice. I really feel when you're a parent of a SEND child an autistic child you don't have choices. The only the you want to do is the best by your child and anything outside of that is letting that child down. Now that's difficult in a world, it's a whole driving process and you know talk catchment areas, talk of geography. I'm not interested. I'm interested in in what's going to keep my child safe, keep her happy. And let her progress and let her live a life she deserves and is fulfilling as possible

because if I don't do that, I'm, you know, I'm laying it down and you know these changes I think are going to let her down.

10) I really feel strongly about is that every child should be a priority somewhere. And what I find really tricky with these proposals is there are because we have two daughters, they're autistic. No sibling links anywhere. They under these plans, they are not a priority anywhere. Now I just feel like the rugs gone if this goes ahead and I just think that is really a nasty policy where you've got a load of kids that don't have a priority anywhere and I understand what people are saying in single school catchments, but at least those kids have a priority somewhere there. At least they're a priority in that school. At least they've got some sort of stability when they move to their accommodation. They probably knew you know the situation they were getting into there. They've had time to plan but as with our daughter in year five, I just feel like it's such a shock. And to suddenly say now your kids not a priority anywhere actually, you know their priority seven priority seven because they because they don't have a sibling link or anything when there's a school a 15 minute walk away. I just think it's scandalous and a really nasty policy actually for those children that are no longer a priority anywhere.

11) I have an autistic daughter as well, and she doesn't have an EHCP and there was a parliamentary debate last week about EHCPs and has scandalous it is and the percentage of EHCPs that go to tribunal and that local authorities lose. I just find it really unbelievable and really like going back to the dark ages, the way that our children are being dismissed disregarded. As if school trauma is part of being a child and it isn't, it shouldn't be. And we are working so hard to support our daughter, as I'm sure other people are as well, supporting their children to have the least amount of trauma as possible. And I'm not sure anywhere where that should be somebody's ambition for their child. And this just adds to it. I don't understand how it happened and I don't understand why it's being allowed to continue and rush through in this way. It feels inhumane actually. I want to suggest that you slow down a bit, it feels like the aims of these proposals are so broad. You know you're trying to increase attainment, you're trying to, you know, you haven't seen the data from the from the free school meal policy that's been implemented. You're changing plans and actually at the end of it, you're not. I can't see how you're going to get a clear data set at the end of that to say, actually. The free school meal policy worked. I don't, and also I'd imagine that other local authorities around the country would be looking at Brighton and Hove going. Is this what is this going to? You know, it has this worked and he would be doing a disservice to other local authorities around the country because you wouldn't be able to provide that data set to them, you know, to academics who've worked on this, you're not giving them the data set that they need. So I mean it's not necessary solution, it's a suggestion I guess but slow it down maybe focus on. Reducing the priorities because I can see, you know, it's like, well, we're trying to kill loads of birds with one stone here, but maybe focus on one or two of the priorities, get the data and then over a number of years. Increase, you know, make those changes by doing it all at once. I mean, the fallout as we've heard. I mean it. Yeah, will just be horrific for families with send young carers. You know people will leave the city, you know, schools will have to close because there will not be the pupils to service those schools.

12) That message of slowing down and disaggregating has been consistent from the engagement through your expert advice at the Scrutiny Committee. And a constant reprise. It's absolutely every time you put a proposal, it needs to be this perfect proposal and you're never going to get it right like that you need. Listen to people. You need to build and you need to look at the systems. Everything is we'll think about it later. We've really struggled with the free school meal calculation. Had difficulty with getting the data points right and they changed. The transport links is going to be later. Most importantly, SEND support feels like it's been an

additional. It's almost like you've woken up to it two weeks before the engagement and you're not going to get the proposals right like this. Please focus on free school meal. Get that right. And that's the policy that that is going to support disadvantaged economically and then work and build a solution with all of us that want to help and want to get it right.

**Parent Carer Question: If we're supposed to be talking about solutions, why can't children with SEND in all its forms be a priority on their own? Why? Why is priority two so small, and why is it so difficult to get a place under that priority? It sounds like that's not going to change as part of these proposals, but why do they then? Are children automatically go to the very bottom of the pile? Is there not something else we can do to prioritise them when they are so important and they have such huge challenges?**

Local Authority: Obviously, you know one of those considerations has to be what it is that we can use in terms of different criteria that are available to us. Under such you mentioned earlier on free school meals as an element of pupil premium is one of those things that we can look at special educational needs in itself is not a criteria that can be used. What is possible is this exceptional and compelling rationale that's there. And then that's for us to consider that sort of definition and application of how that, how that works so. You know that is the process to be able to capture those particular circumstances. Before Allocation Day takes place, national offer day, obviously subsequent to that and I appreciate that in itself has limitations. But subsequent to that the appeals process that is in place is an opportunity for those individual circumstances, for children to be judged against the delivery of education by that school. In reality, so it provides that element of consideration for change after allocation day based on that particular child's circumstances. But I acknowledge that that comes after a process at some point before September, which in itself reduces time. For families, for children to be considering what that might mean for them in terms of altering places that have been offered. But I guess within the code itself that is the sort of opportunity that is put into the system to consider. Individual circumstances beyond those elements that we can include in the in the in the initial priority list.

**Parent Carer Question: Why is that though? Why can't you include more on SEND? Why does it have to be through the panel and make it so difficult? Why can't we just get the SEND codes at school to say which children need additional support? Why does it have to go through this really complicated panel and then through an even more complicated nightmare appeals process which is so hard for people without send to navigate, let alone challenges that people here have got with their children?**

Local Authority: Consistency of decision making that's needed. A panel will provide that consistency of decision making. However, it's however it operates what is hard to do is to be able to make those decisions through the priority process just based on comments or recommendation or you know those viewpoints of individuals who may not be consistent across all of those applications that are having to be looked at. So I the sort of emissions code is quite black and white about. Groups or considerations that can be made, you know similarly academic ability or whatever is one of those things that can't, can't be considered an application forms. Why? There's sort of tiebreak has to go, you know, has to be something that could be defined down to a definitive yes or no, you know, either in our case sort of random allocation or, you know, of the other common one is distance to school. Which you know, comes down to centimetres in reality measured. You know, even, you know, different doors in, in blocks of flats it's that sort of need for a binary decision that that impacts on it. And that's why when we're looking at broader categories, the role of a panel becomes important to ensure that consistency of decision making.

Parent Carer Feedback:

13) First, in answer to the question about what could we do differently, does all of this not show that actually the schools that we have on offer in Brighton & Hove are in the wrong place, Longhill is so far out of the city that it isn't able to provide what we need within the city. And I know the answer to this is super expensive. But surely we need to be going to the government and saying as a city, we aren't able to provide. The education for the children that are here with the schools that we've got and actually we need to start looking at alternatives and bringing in bringing another school. I mean it was talked about bringing a school in at the top of Elm Grove cut to cover that massive area that has been has not since any decent when there's a big gap in the middle of the city that doesn't have such secondary education that is close enough. And that is really what we're fighting against here. And but I mean, no one can answer that question, I'm sure, but that feels like that. What we're we should be looking for what we should be as a city. We should be fighting for.

**Parent Carer Question: This panel that Richard is talking about, do you have an estimated number of applications that you're expecting the panel to have to work through?**

I think you know we sort of commented on before we haven't you know we know the numbers of applications that have been used under that priority previously and we will have to consider the impact of whatever proposals are determined into consider the workload that will come as a result of those changes. So you know.

That that element of numbers and capacity now, I think Georgina spoke earlier on about you know we as a Council are committed to provide the capacity that's needed to address what we have to address. So there isn't, you know, we haven't got an estimated number at this moment in time.

You know, it's one of those things that we will have to consider once we know what proposals are determined in response to the sort of feedback we've heard and obviously the, you know, the consideration about the, the information that's provided to parents to clarify the process etcetera. So sort of a long answer, \*\*\*\*\* to you know you know to being you know we will we will ultimately wait and see.

What that? What that workload comes through us. But we know historically what numbers of applications come through that particular process and we will apply a consideration to how that may increase as a result of decisions that have that are made.

**Parent carer reply to the answer: my concern will be that you will be receiving a lot more and that you will not have the capacity to actually give each of those individual cases the time that they deserve to be given to get put those children in the right places because at the end of the day you will be restricted by time. There is that is because of national affidavit because of all of the system that is in play. And without suddenly increasing the number of people you employ and having. You're going to these. I don't think these cases are going to get what they deserve. The time they deserve and the consideration.**

Local Authority: I don't know. We say obviously, we think this approach that we use to consider applications work through our primary and our secondary schools now. So we've already seen a 50% reduction in the number of applications for primary school places over the last sort of eight or nine years under such you know our capacity flexes to the numbers of applications that come in in each year. So understand that a proportion of all of those in each year would be made where applications would be made. You know, the Council's already had to respond. First of all, with that rise in pupil numbers going through our primary schools and

the rise that's gone into our secondary schools subsequently in terms of the proportion of applications that will be considered under priority two by virtue of that. And similarly, we've flexed back when we have seen a number of pupils dropping in our primary schools currently because that will have affected the number of applications. Considered under priority two previously or submitted under priority two so previously.

**Parent Carer Question: Richard said that he knew how many people applied under priority to currently, and I wondered what that was because we know that only a handful of people get in, lay under that priority lay and yeah, I just wanted to work out whether that is a handful out of 10, like, you know, a handful out of. A few 100 or a few thousand and that.**

Local Authority: It's certainly not thousands. Or but I don't have that data here to hand to be able to provide you with a number. We can look back and provide that information. You know, at the moment we're obviously prioritising taking on board the feedback that we're hearing through the, the consultation events, etcetera, preparing for the next steps that need to be done. But we can ask for colleagues to collate numbers of applications that we've received under that priority for sure.

**Parent Carer Question: are you able to provide some case studies of what might and might not be allowed under priority tier? Is that any further along, might we see that before the end of the consultation, so we can use that to feedback in our response?**

Local Authority: We are impacted by threats of legal action currently. This limits what the Council is able to do under that particular circumstance. It makes us sort of in a position of having to be more mindful of providing additional information at this time, which is unfortunate, but is the reality of a of a situation that we are faced with currently.

**Parent carer Question: My question is around priority 2 and Georgina mentioned that this are going to be on call to help with writing reports with educational psychologists, etcetera. As far as I understand, and I may be wrong, the schools themselves pay for the BHSS reports and assessments, and it comes out of their budget, and I can imagine this really affecting the schools. But if that's the case, it would be massive impact of primary school budgets and access for other best support for children. May be years away from going to secondary school and the schools are going to have to prioritise year 5 and 6 above other children and also consider the finances. I may have got that wrong, but has that been considered?**

Local Authority: I think it's fair to say through the consultation period for that this has become very apparent and we are, you know, we are looking at the impact and implications of these proposals and around those additional pressures that are very much likely to be on the inclusion support service and the schools. So yeah, we are taking that into account and looking at that, you're right. You know, schools do pay for some of these services, some of them, you know, some of those, some of the service that we offer is not paid for by schools, it's a 3 tiered approach. We have statutory core which is funded by the local authority and then schools put in some additional funding. So it's, you know, it's not always the case, but what we're going to have to do, I guess, is to look at what that capacity would be needed and if needed, how we might provide that, so you know we are looking at that in the round whilst we're going through this consultation period, but you know it's something that we're definitely considering.

The LA is collecting and collating all of the things that we've heard during this process. So I just wanted to sort of explain a bit about how we take all that information and we'll pass that on to the councillors who will be making the decisions about this in February.