



Glasgow City Council
City Administration Committee

Item 2

24th January 2019

Report by Councillor Chris Cunningham, City Convener for
Education, Skills and Early Years

Contact: Jim Wilson Ext 74086

RESPONSE ON THE PROPOSAL TO CONSULT TO IMPROVE THE PLACING REQUEST CRITERIA FOR MAINSTREAM SCHOOLS (PRIMARY AND SECONDARY)

Purpose of Report:

To provide a summary of the responses to the consultation and to seek approval for the proposed placing request criteria set out in section 6.

Recommendations:

The City Administration Committee is asked to approve the proposed placing request criteria as set out in section 6.

The full response is available on
<https://glasgow.gov.uk/index.aspx?articleid=17886> .

Ward No(s):

Citywide: x

Local member(s) advised: Yes No x

consulted: Yes No

1. Background / legislative requirements

1.1 Education Services promotes the advantages of 'local schools for local children', that is, that children attend their local catchment-area school. However, Education Services also recognises the rights of parents¹ to make a placing request for their child/children to be educated in a school other than their local 'catchment-area' school.

1.2 Placing requests can be made to:

- Any **Mainstream School** managed by Glasgow City Council;
- Any **Additional Support for Learning School** managed by Glasgow City Council; and
- Any **Independent Special School**.

The current Glasgow City Council Management Circular which contains the current placing request criteria and priorities are detailed in Appendix 1. Parents submit placing requests for a variety of reasons, for example, linked to childcare or the school requested is near their place of work.

1.3 Placing requests are best made prior to a child starting school or a particular stage of school but can be made at any time during the school session. If a child is due to start school in the forthcoming August, he or she should be registered in their catchment primary school before the end of the preceding January. On-line registration is open from November each year. Parents can make a request for more than one school but Glasgow City Council is only required to consider the choice in the order of preference provided by the parent on the form. A parent wishing to transfer from one sector to the other, denominational (Roman Catholic) and non-denominational within in the Glasgow City Council area, are required to make a placing request.

1.4 Placing request criteria are used to determine the allocation of places for children; in situations where there are more children seeking places in a school than there are places available. The same placing request criteria are also used to allocate places in over-subscription situations (over-subscription occurs when the number of children who reside within the catchment-area exceeds the number of spaces available in the school).

1.5 School rolls in the city are steadily increasing after decades of reduction. This necessitates that Education Services effectively plans to ensure future capacity is met (see 2.1-2.2).

1.6 Placing requests are part of the entry requirements for schools, therefore, changes to placing request criteria are covered by the Schools Consultation (Scotland) Act 2010 and require statutory consultation in line with the Act.

¹ *Parents' refers to parent(s)/carer(s) and in particular circumstances young people acting on behalf of themselves in matters pertaining to placing requests.*

2 Proposal

- 2.1 Over the last decade, there have been considerable changes to the education estate, the increasing number of pupils attending Glasgow City Council schools, and the nurturing approach to learning underpins many of the improvements achieved. Although these changes and improvements are welcomed, they present Education Services with a challenge in relation to effectively managing resources to ensure there are the right schools, of the right size, in the right place at the right time.
- 2.2 The placing request criteria had not been reviewed for more than a decade. Therefore, Education Services wished to consult on changes to the placing request criteria and procedures in order to make the process clearer, more transparent and to improve Education Services ability to effectively and efficiently manage resources through future-planning based on robust evidence and trends.
- 2.3 The current criteria are listed in Appendix 1; they work well in most cases. However, informal feedback from parents and others suggested that they were not all perceived to be fair and/or clearly understood by all. For example, some parents have objected to the distance criteria being used as it favours those who live closer to a school without taking cognisance of available transport.
- 2.4 Education Services reviewed the current criteria and proposed, the following criteria for granting requests (in rank order of priority):
- (i) A child or young person residing within Glasgow City Council area who has additional support needs and requires the provision of support provided within the school requested. Supporting documentation evidencing the reasons for the request, signed by an appropriately qualified person with a proven expertise in the particular matter which has led to the additional support need will be required. The Head of Service with responsibility for inclusion will assess all applications seeking to receive priority under this criteria.

Education Services believes this is better as it makes use of the term 'additional support needs' which includes medical condition but also includes a range of other needs. It is also a term which parents will be more familiar with in an educational context.

- (ii) Children who face on-going family circumstances, requiring support that placement in the requested school would help to address. The Head of Service with responsibility for inclusion will assess all applications seeking to receive priority under this criteria.

For example, this would support children who were, for example, subject to joint parental care through a court order and therefore residing at different addresses during the week.

- (iii) Children living in the catchment area of, but not attending, a primary school of the same denomination as the requested secondary school.

It has always been the case, in Glasgow, that when a child is registered in either a denominational or a non-denominational school and subsequently wishes to change sector that a placing request is required. This criteria gives priority when children in the catchment area of the school they wish to move to.

- (iv) Children who will have siblings at the school during the next academic year. Priority will be given to children who have a sibling in the year group closest to P1 or S1.

This supports families with more than one child by prioritising siblings when seeking a placing request. Those with children who will attend school for the longest period of time are further prioritised by stage within the school.

- (v) A child or young person who requires the particular teaching methods provided by that school to progress a particular aspect of learning. Examples are: the child requires to be taught in a school that specifically delivers education using the Gaelic medium; the family has an affiliation to the religious ethos of the school. Documentation showing the affiliation to the teaching method or the religious ethos must be produced, for example the child's baptismal certificate for the denomination of the school.

This supports families who can evidence their commitment to the unique identity of both denominational and Gaelic medium schools. It does not include the School of Sport or the Dance School of Scotland both of which have their own criteria for entry.

The criteria will be applied in the order shown above. If, for any category, the number of requests exceeds the number of places available the next succeeding criteria will be used to prioritise those requests, and so on, until all priority criteria have been exhausted. If, after this process, two or more requests cannot be distinguished as having priority, then a ballot will be held to allocate the places available. This ballot will be organised by a senior officer of Education Services.

3 Public meetings

- 3.1 There were six public meetings held at secondary schools across the city. The meetings also considered the consultation on delineated secondary school catchment areas which was open at the same time. 19 people attended the public meetings.

4 Responses to the consultation

- 4.1 290 respondents registered with the survey. 256 (88.3%) identified as parents or carers, 23 (7.9%) identified as school staff, 14 (4.8%) identified as Council

staff, 2 (0.7%) identified as pupils, 14 (4.8%) identified as residents and 7 (2.4%) identified as 'other'.

- 4.2 175 responded to the question 'do you agree with the redrafted placing request criteria'? 115 (39.7%) skipped the question. 65 (22.4%) agreed and 81 (27.9%) disagreed, 29 (10%) responded Don't Know/Prefer not to say.
- 4.3 139 responded to the question 'do you agree with the order in which they [placing request criteria] are listed and will be applied? 151 (52.1%) skipped the question. 49 (16.9%) responded Yes; 64 (22.0%) responded No; 26 (9%) responded Don't Know/Prefer not to say. 39 provided comments to the question and 63 provided additional comments.
- 4.4 The comments were varied. Of the 39 comments on the first question, six of them felt that distance should be included and seven felt that siblings should have a high priority. Five stated that they were against the criteria which referred to particular teaching methods for Gaelic medium education (GME). In the final question which was 'do you have any other comments?' 14 of the comments were in relation to GME. A number of these were identical or broadly similar based on a response from Comann nam Parant Ghlaschu. They did not support Gaelic being included in the criteria. They wanted parents to be offered a place at another GME primary if their local GME was over-subscribed with transport provided and where parents wanted their child to attend a different GME primary from their catchment then a placing request would be required and parents would be responsible for transport. This is the current position and there is no proposal to change this. They did support a ballot being used when all the other criterion had been exhausted if there was a need.

5 Education Scotland report

- 5.1 The full report is available as part of the full responses document on <https://glasgow.gov.uk/index.aspx?articleid=17886>. Education Scotland were, overall, supportive of the proposal. Where they have raised issues Education Services have provided a response as set out below.

5.2 Education Scotland

It would be helpful for stakeholders if aspects of the proposed new criteria had further explanation. It is not sufficiently clear how the second criterion of 'children who face ongoing family circumstances' would be applied to achieve greater consistency and transparency. The council should consider whether this criteria should be reviewed to achieve its stated aim of greater consistency and transparency. This should include the role of the Head of Service in assessing the applications.

Response from Education Services

Further detail on the proposed new criteria has been provided in section 6. The second criterion 'children who face ongoing family circumstances' was included at the request of representatives of Parent Councils who were keen that recognition was given to family circumstances that may impact on a

child's place at a particular school. We accept that the criterion is open to interpretation but this is deliberate to enable Education Services to support the very wide range of needs that exist in the city. It is because of this that we have proposed that the Head of Service with responsibility for inclusion would be involved in assessing and deciding on the applications. It is our intention to write guidance for parents and carers for each of the criteria which would be available on-line and on request to support parents and carers when making a placing request application. This guidance would include advice on what would be reasonable evidence to support a placing request for each of the criteria and would include advice on appeals if a placing request is refused.

5.3 Education Scotland

The council should review their proposed fifth criterion (a child or young person who requires the particular teaching methods provided by that school to progress a particular aspect of learning). Respondents felt strongly that parents and carers should not have to evidence a commitment to Gaelic Medium Education, rather they felt that Gaelic Medium Education should be open to all those who wished it.

Response from Education Services

As noted at the end of the Education Scotland report, 'In discussion with inspectors, the council has stated that it will be taking into account the views of stakeholders and will be amending the criteria, for example, by not including Gaelic Medium Education in the reviewed criteria.'

5.4 Education Scotland

Stakeholders who responded to the consultation raised a range of issues including the view that distance from a school should be included as a category.

Response from Education Services

As noted in 4.4, the comments were varied. Of the 39 comments on the first question, six of them felt that distance should be included and seven felt that siblings should have a high priority. These comments have been taken into consideration in the amended proposal for the placing request criteria in section 6.

5.5 Education Scotland

Parents, children and young people, and staff who discussed the council's proposal with HM Inspectors had mixed views on the council's proposal. Almost all agreed that it was important to give additional support needs the highest priority. Several felt that the ranking for denominational education had been diminished and that they preferred the existing ranking.

Response from Education Services

These comments have been taken into consideration in the amended proposal for the placing request criteria in section 6.

5.6 **Education Scotland**

A number of members of staff questioned the need to include additional support needs in placing requests criteria since they felt this should be handled through inclusion policy and children's planning as a matter of entitlement rather than a process involving application.

During discussion, stakeholders raised a number of important issues regarding their experience of the existing placing request process. A few parents raised the issue of children and young people with disabilities and some spoke negatively of their experience with the existing system.

Response from Education Services

If parents of children with additional support needs make a placing request to a mainstream school the placing request criteria discussed in this paper will be applied.

It should be noted that the law only allows Education Services to place certain children in special schools. Education Services cannot place a child in a special school if the child can be educated in a mainstream school.

The child or young person would only be educated in a special school if the mainstream school—

- (a) would not be suited to the ability or aptitude of the child;
- (b) would be incompatible with the provision of efficient education for the children with whom the child would be educated; or
- (c) would result in unreasonable public expenditure being incurred which would not ordinarily be incurred,

and it shall be presumed that those circumstances arise only exceptionally.

If one of the circumstances (a) – (c) above arises, the authority may provide education for the child in question in a school other than a special school; but they shall not do so without taking into account the views of the child and of the child's parents in that regard.

Education Services have already committed to review the guidance for placing requests for mainstream schools. Separate guidance exists for those parents who wish to make a placing request to a special/ASL school. This guidance will also be reviewed.

5.7 **Education Scotland**

Staff were concerned about the impact of the existing placing request processes on school induction and transition planning.

Response from Education Services

Parents and carers have a right to make placing requests if they do not wish their child to go to their local catchment school. Inevitably this will impact on school induction and transition planning because the timescales for placing requests are set out in legislation and it is relatively late in the academic session when decisions are made, i.e. by end of April. The decision is ultimately for parents to make understanding that there could be a negative

impact on school induction and transition planning. Education Services will ensure there is a reference to this in the guidance to be developed.

5.8 Education Scotland

A few parents spoke of the stress and anxiety caused by potentially having to place children at different schools and felt that the sibling category should receive a higher priority.

Response from Education Services

Education Services recognises that should this situation arise then this could cause stress and anxiety. The redrafted placing request criteria in section 6 place siblings as the third criteria and have kept it as a separate criteria to reduce ambiguity. However, parents and carers also need to be aware that there are no guarantees with placing requests and the position can arise where siblings are unable to gain access to a specified school because of demand from catchment children who are always given priority over placing requests.

5.9 Education Scotland

Several parents who spoke with HM Inspectors felt that the existing placing request process was confusing and difficult to understand and that there was a lack of assistance for those for whom English was an additional language. The council will need to consider this in its final paper, including the need for accessible information and further support. The council has also committed to undertaking an equalities impact assessment on its proposal.

Response from Education Services

Education Services is sympathetic to this view. The placing request process brings uncertainty which, as previously noted, can bring anxiety and stress. The process is governed by legislation which restricts Education Services' ability to fully respond to concerns. The legislation is available in different languages but we understand that it can still be confusing and difficult to understand for many parents, not just those with English as an additional language. Education Services has committed to developing detailed guidance which will, in as much as is possible, adhere to plain English guidelines. We will work with our City parents' forum to develop the guidance so that the needs of parents and carers are prioritised.

6 Placing Request Criteria

6.1 Having reviewed all the comments in detail, the notes from the public meetings and the report from Education Scotland, Education Services are proposing the following criteria for granting requests (in rank order of priority). Note that full guidance will be developed on each of the criteria to support parents should these criteria be agreed.

1. Children residing within Glasgow City Council area who have additional support needs and require the provision of support provided only within the school requested. Supporting documentation evidencing the reasons for the request, signed by an appropriately qualified person with a proven expertise

in the particular matter which has led to the additional support need will be required. The Head of Service with responsibility for inclusion will assess and decide on all applications seeking to receive priority under this criteria.

2. In relation only to denominational schools, those children whose parents can demonstrate an affinity with the religious ethos of the school (for example, a baptismal certificate from the Roman Catholic Church or a supporting letter). All applications seeking to receive recognition under this category should be supported by documentary evidence as outlined above.
3. Children who will have siblings at the school during the next academic year. Priority will be given to children who have a sibling in the year group closest to P1 or S1.
4. Children who face on-going family circumstances, requiring support that only placement in the requested school is likely to address. Supporting documentation evidencing the reasons for the request will be required. The Head of Service with responsibility for inclusion will assess and decide on all applications seeking to receive priority under this criteria.
5. Children living in the catchment area of the requested school whose parents are required to make a placing request because the children are not attending a school of the same denomination as the requested school.
6. Children ranked by distance between home and school by a suitable walking route (This criteria will be used when all of the above have been exhausted). Those living closest to school ranking highest.

The criteria will be applied in the order shown above. If, for any category, the number of requests exceeds the number of places available the next succeeding criteria will be used to prioritise those requests, and so on, until all priority criteria have been exhausted.

Where there are too many applications from catchment children for their local primary or secondary schools, then the above criteria numbers 1 to 5 will be applied in order to decide on those children to be offered places. If, after this process, two or more requests cannot be distinguished as having priority, then a ballot will be held to allocate the places available. This ballot will be organised by a senior officer of Education Services.

Note that the final criteria of distance will only be used to determine the allocation of placing requests. A ballot will be used in cases of over-subscription where all the children being considered live within the catchment area.

- 6.2 The new guidance which would to be developed would be made available on the Glasgow web-site and, in schools, as necessary.

7 Date of Implementation

- 7.1 The above criteria will take effect from 1 August 2019. This means that the current placing criteria remain in place for entry to school in August 2019.

8 Equality Impact Assessment

- 8.1 The quality improvement officer with responsibility for Equalities carried out an Equality Impact Assessment screening for this response. The screening process did not identify issues which would require a full Equality Impact Assessment being carried out. The full screening is available as Appendix 3.

9 Policy and Resource Implications

Resource Implications:

Financial: Within existing resources

Legal: Consultation was undertaken in accordance with the Schools (Consultation) (Scotland) Act 2010

Personnel: N/A

Procurement: N/A

Council Strategic Plan: Excellent and Inclusive Education
It is linked to the above priority but does not link directly to the identified priorities.

Equality and Socio-Economic Impacts:

Does the proposal support the Council's Equality Outcomes 2017-22 Yes

What are the potential equality impacts as a result of this report? No significant impact – as set out in section 8.

Please highlight if the policy/proposal will help address socio economic disadvantage. The proposal is not linked to disadvantage.

Sustainability Impacts:

Environmental: The proposal would have limited environmental

impact.

Social:

The proposal would assist parents as there would be greater clarity.

**Privacy and Data
Protection impacts:**

Responders were asked to provide name, age, address and reason(s) for responding. Young people under 16 had personal details withheld in the response document. Those over 16 were offered the option of this. The data would only be used/held by Glasgow City Council for the purposes of consultation under the Schools Consultation (Scotland) Act 2010.

10 Recommendations

- 10.1 The City Administration Committee is asked to approve the proposal as set out in section 6.