



**SOUTH EASTERN EDUCATION
AND LIBRARY BOARD**

**Response of the
South Eastern Education and Library Board**

**To the
New Admissions Arrangements for Post-Primary Schools
Consultation Document**

30 June 2005

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INTRODUCTION

The South Eastern Education and Library Board welcomes the opportunity to respond to the Department of Education's proposals on the new admissions arrangements for post-primary schools as presented in the consultation document (January 2005).

The SEELB places children and young people at the centre of all its work through the provision of high quality education, youth and library services.

The Board agrees that the admissions arrangements should work for the benefit of all children, should be based on the principle of informed parental and pupil choice and should be as straightforward as possible for parents to use.

This has implications for educating parents and for greater parental involvement throughout the pupil's education. It will also require adequate resources.

The Board welcomes the importance placed on taking account of parental views and aspirations "as well as professional experience and wisdom of the teaching profession and the wider education service".

The Board is very aware that, although the ending of the Transfer Procedure will help increase parental choice, this does not necessarily mean an even distribution of applications and places. The procedure merely allows for a statement of a preference and not a commitment to offer places in any school of choice.

The Board notes the government's aspiration that it intends to ensure that parents have the confidence that "all schools are good enough" for their child, through its commitment to the capital building programme, and the development and implementation of the Revised Curriculum and the Entitlement Framework. Such programmes will however impact over a longer period of time -10 to 20 years. The most pressing challenge for all stakeholders remains over the next 5 to 10 years to ensure that all schools which are in need are adequately funded and supported to enable them to provide the highest quality education for their pupils and to have the confidence of pupils and parents. **The substance of this response is realisable only if the above developments are successfully implemented.**

The most pressing challenge remains that parents do not consider that all schools are yet "good enough" and this can result in disappointment if their first choice is not met.

The Board has always recognised the importance of creating an educational structure which provides for and develops, the unique attributes of each person to enable them to achieve their full potential. For that reason the Board strongly commends that the key motivation intrinsic to these proposals is to enhance the life chances of all young people in Northern Ireland. However the Board regrets that the new admissions arrangements are being put in place in the absence of new post-primary arrangements.

Central to the Board's response to consultation on the new admissions arrangements is the premise that the proposals for the revised curriculum and arrangements for post-primary education need to be considered in parallel.

In presenting this response, the South Eastern Education and Library Board would wish to express its recognition and appreciation of the valuable contribution made by all schools to the education and development of young people in Northern Ireland. Moreover, the Board would wish to emphasize that in any change to the new admissions criteria or reorganisation of post-primary education, the focus must be on the improvement and enhancement of the educational experience of each young person, while at the same time retaining and building upon all that is excellent within the present system.

The Board, in formulating its view on the proposed admissions arrangements, consulted with the Curriculum Service - CASS, Transfer and Open Enrolment, Special Education sections within the Board.

The response by the Board is presented under headings which reflect the relevant chapters and questions.

CHAPTER 1 CONTEXT FOR THE NEW ADMISSIONS ARRANGEMENTS

The document highlights the key factors effecting change in schools over the next few years such as the post-primary review, the new curriculum and the declining pupil numbers, and notes that the new admissions arrangements will take effect in an educational landscape which will be quite different to the current one.

The Board is concerned that these new admissions arrangements are being put in place for a post-primary structure which is not yet in place. Many of the recommendations are dependent on a number of changes still under discussion, for example, the Revised Curriculum Implementation, Specialist Schools, and the Entitlement Framework.

Pupil Profile

The Board welcomes the principle of a Pupil Profile which will replace the annual report and will provide parents with clear, objective and comprehensive information about their child's progress, achievements, attitudes, aptitudes, interests, capabilities and skills in order to inform key decisions on post-primary education.

The Board maintains that for pupil profiling to be successfully implemented, it needs to be adequately resourced in terms of educating parents, training for Boards of Governors, pre- and in-service training for teachers and teacher release time for profiling, administration and consultation with parents.

Although the profile is a tool to help parents choose, the Board believes that the profile should form the basis of discussions between parents and post-primary schools.

The profile must be rigorous and provide specific information to enable those schools which are oversubscribed to ensure equity of opportunity.

The New Curriculum

The Board welcomes the increased choice and flexibility within the Revised Curriculum, the greater emphasis on real-life skills and Learning for Life and Work and the improved relevance of the curriculum for young people.

The Revised Curriculum will give schools greater flexibility to develop their own approaches to meet the needs of their pupils.

Entitlement Framework

The Board welcomes the Entitlement Framework which guarantees each pupil a minimum of 24 courses at Key Stage 4 and 27 courses post 16, of which at least 1/3 courses must be vocational and 1/3 academic, allowing schools to reflect their ethos and the pupils to have access to more than one style of curriculum.

The Board highlights the need for the Department to provide adequate funding to bring all schools up to a standard of accommodation, equipment and provision or to enable them to engage in collaborative arrangements which will ensure that they are all able to provide the Entitlement Framework. In the short to medium term the disparity in provision will remain unless this funding issue is addressed.

Co-operation and Collaboration

The Board has always advocated collaboration and partnership in the interests of enhanced provision for our young people. The collaboration arrangements in this document and outlined in the post-primary consultation document take the current collaborative arrangements a stage further. If they are to be successful, time and funding must be available to plan, to build and if necessary, to restructure.

Specialist schools

The Board supports the principle of schools developing their strengths and sharing good practice.

The Board has serious concerns about the implications for schools and the whole education system with regard to the funding and staffing for support to specialist schools given the financial crisis in education in Northern Ireland.

Oversubscribed Schools and Demographic Trends

The demographic trends in the South Eastern Education and Library Board show a marked decline in the 11-17 year old population by 2015 ranging from 21% in North Down to 6% in Ards.

The Board agrees that there will be popular schools and a number will continue to be oversubscribed while in some areas demand for places will be less and fewer schools will have to apply admissions criteria. This will in turn reduce pressure on parents.

The Board is concerned that some schools may in the interim become “sink schools” and may be unable to provide a quality education for the remaining children as their pupils are drawn away to schools in other areas.

The potential for increased movement of children from the South Eastern Education and Library Board area to schools in other areas has implications for increased transport costs.

CHAPTER 2 PRINCIPLES AND OBJECTIVES

Question 1

The Department is seeking your views on whether the principles and objectives outlined provide a sound basis on which to develop new admissions criteria.

The South Eastern Education and Library Board broadly supports the principles and objectives for new admissions arrangements, with the following observations:

- All stakeholders, including parents and schools, should put the educational well being and the interests of the child at the centre of the decision-making process. This should ensure that there is no bias or indirect discrimination against any group or individual.
- There should be a greater emphasis on the active participation of both parents and pupils in the process.
- “Informed” choice by parents and pupils is dependent on the ongoing active engagement of parents in the child’s education and in the pupil profiling process from Year 1 through to Year 7. This will ensure that the profile does not come as a shock to parents in Years 6/7.
- The principle of informed “choice” could be misleading. Parental “preference” would be more realistic given that admissions numbers are set by the Department. It is not a given that ‘informed parental choice’ will determine a pupil’s post primary provision and parents may be disappointed to learn that the expression of their choice will not always result in securing a preferred place. This may lead to the creation of an unrealistic expectation that parental choice will prevail.
- There should be inbuilt flexibility to facilitate easy transfer of pupils in cases where schools may be oversubscribed or where it is in the best interests of the child’s educational development.
- It is our view that preference may be curtailed by school provision in the local area particularly in rural areas.
- The new admissions criteria should be consistent across schools and all stakeholders should have access to and a thorough understanding of all arrangements. The Freedom of Information Act and data protection legislation will contribute to greater transparency within the system.
- A definition of “normal” and “local” is needed to bring clarity to the process.
- While endorsing that the admissions criteria of schools in a local area should be complementary the Board has a number of concerns:
 - Complementarity can only be fully realized once an agreed secure post-primary infrastructure is in place.
 - To ensure equity and equality of opportunity a careful review of what constitutes legitimate criteria should be undertaken and exemplification provided by the Department.
 - The Board has concerns regarding the issue of “each child given some priority under at least one set of admissions criteria”.
 - In the absence of a transfer test there are concerns that some schools may apply an admissions test as one of their criteria.

- In the interests of equality of opportunity and inclusiveness, the admissions criteria of each school should ensure full and equal access to the curriculum. Under equality of opportunity the admissions criteria should be exactly the same for each child and it is incumbent upon any school to ensure that whatever the child's physical need it must have the ability to ensure that the child has equal access to the full curriculum.
- If schools are given sufficient flexibility to set their criteria it is unrealistic to expect that each child will be given priority under one set of criteria within a particular area.
- It is a fallacy to think a reduction in the number of pupils will reduce pressure on 'popular' schools.
- Existing transport policy militates against maximising parental preference.
- It is important to ensure that parents have the confidence that all schools are good enough for their child. However, the Capital Building Programme, New Curriculum, Entitlement Framework along with an overall reduction in numbers will not by themselves ensure this objective. The Department must be prepared to implement appropriate measures in support of raising standards in schools which parents perceive are not yet 'good enough'. First preference applications are a sound indicator.
- The exercise of choice should be deferred to 14 when it is educationally more appropriate.

CHAPTER 3 CHOOSING A POST-PRIMARY SCHOOL

Question 2 Pupil Profile

The Department is seeking your views on:

- whether the Pupil Profile should be used in the way described in the Consultation Document; and**
- whether there are alternative or additional ways in which the Pupil Profile should be used to help parents decide on future post-primary provision for their child.**

(a)

The Board agrees with the fundamental principle underlying the new admissions arrangements of "informed parental and pupil choice". However, some issues need to be considered to ensure that information is relevant and wide ranging and that parents are actively engaged as contributing partners throughout the process to ensure that the evidence in the Pupil Profile is both legitimate and agreed by all stakeholders.

In particular it is the view of the Board that it is too late in the process to begin discussion on the child's Pupil Profile in Year 6. We cannot overstate the need for parental contribution, reciprocal debate and agreement by all stakeholders throughout the process. The parent – child – teacher consultation and their understanding of the process are central to its success.

The Board foresees difficulties arising in defining 'Aptitudes for Learning'. Every child has an aptitude for learning, so defining a progression which is educationally valid may pose a challenge.

The Board is of the view that the recommendations proposed would place a significant burden on principals and teachers. It is essential that the Pupil Profile is completed objectively and reflects the child's educational needs, interests and aspirations. The Board would be genuinely concerned that educational objectivity could be tempered by fear of litigation and challenging parental opinion.

The Board notes that, if the Pupil Profile is to be used as an objective assessment of a child's achievements, there is a challenge to the 'subjective' opinions aspect of the document.

The Board recognises the significant professional development implications raised in the document. There is an indication that all teachers would need to have quality training in standardised testing, profiling and the use of a range of external tests. Training for teachers would need to be in place very soon, especially in the areas of Personal Development, Thinking Skills and Personal Capabilities and Aptitudes for Learning, in preparation for implementation from Year 5 in 2007. There are also ongoing professional development implications for teachers and Boards of Governors. This staff development issue must be resourced through the CASS services.

The Board has concerns about the potential increase in the bureaucratic burden on schools and teachers. In addition to teaching, primary teachers are also required to spend valuable time on profiling and related administration and paperwork, as well as parental interviews.

The Board has further concerns over the introduction of the Pupil Profile from Year 5 in 2007 for use in transfer in 2009-2010. Schools would need to have procedures and information in place now to ease the introduction of the scheme, otherwise validity and reliability of information will be brought into question.

The Board recommends the development of a 'model profile' in advance which could be used to illustrate 'educational pathways' to parents. This potential education and career pathways could be 'matched' to Pupil Profiles thus providing parents with a range of examples of possible ways forward.

The Board agrees that parents should receive information on and have opportunities to visit post-primary schools. The Board believes that the profile should be used by parents to form the basis of an informed discussion with potential post-primary schools. The Board believes that post-primary schools should not receive the Pupil Profile in advance of these interviews.

Where the Pupil Profile is used as part of the post-primary admissions process, it may be potentially contentious, when the views of parent and teacher conflict.

The Board recommends that the development of a Pupil Profile should be set within a process which develops capacity for the right choice to be made. If the profile is the only document then the process could be manipulated.

(b)

The Board believes that the analysis and consultation would have been significantly enhanced if the consultation exercise had contained examples of profiles.

The Board believes that the Pupil Profile would be enhanced by the inclusion of the opinion of the pupil. If the whole process is predicated on the 'centrality of the child' then the 'voice' of the child should be expressed in the profile.

The place of 'formative assessment' as the 'glue' of the revised curriculum and assessment proposals will necessitate the pupil engaging in setting and achieving personal learning targets. The Board believes that this should be catered for in the profile and the profile should not be a process 'done to' but 'done with' pupils. It should encompass and provide for the opinion and learning of the child.

The Board further believes that there should be greater partnership between parent and teacher in the completion of the Pupil Profile. If there was a section where parents could identify additional information, for example, activities the school were unaware of, then this could encourage parents to 'buy in' to the process and at the same time emphasise that the Profile is not for use as part of the selection procedure.

The Board would caution that when the Pupil Profile envisages subjective as well as objective matters being taken into account then there is significant room for third parties to disagree with the manner in which the judgement is exercised and decisions reached.

Question 3 Advice from the Primary School

The Department is seeking your views on the information/advice which should be available from the primary school to help parents make informed decisions.

The Board agrees that the Pupil Profile should play an important role in the discussions between schools and with parents of the children in Year 6 regarding their progress, achievements and future educational needs.

The Board would draw attention to a number of issues which it believes need to be addressed to ensure rigour, the credibility and the integrity of the process:

- The roles and responsibilities of the parent, child and teacher as contributors to the process and the whole-school responsibility need to be clarified. Clear guidance needs to be provided for schools as to how primary schools will stand over judgements made and advice given.

- Standardised tests are currently in common use in primary schools to confirm or challenge teacher assessment and thinking on pupil achievement but the choice and use of tests are not currently consistent across schools. The Board contends that for credibility in the process, there needs to be consistency across schools.
- The timing of the process has major implications in that it shifts the emphasis from Year 7 to Year 6. Year 7 would now appear to be a transition year. End of Key Stage 2 summative assessments could be redundant. They may be used by government to monitor overall standards but little else. The Board would have concerns that there is potential for a drive to achieve higher levels by the end of Term 2 of Year 6 and the possible emergence of a new culture of private tutoring, which could distort results and the curriculum provision.
- The Board believes that academic achievement will initially remain the main focus for many parents in making the decision about transfer to a post-primary school. The Board therefore recommends that a training strategy for parents be agreed and implemented to develop parents' knowledge about the curriculum and assessment process and their role in it.
- The Board notes that primary schools will need to plan for the parent – child – teacher consultation including, the timing and number of consultations, and that there should be a consistent approach across schools.
- The Board is aware that there are concerns about children who develop late or who are misplaced. The Board therefore would seek clarification as to the process and procedures to enable movement within the system.
- The Board believes that, to ensure rigour and consistency in the process, there needs to be training for teachers.
- The Board would also have concerns that assessing Aptitudes for Learning might lead to a return to measuring IQ to provide evidence. This would be incompatible with the whole philosophy underpinning the Revised Curriculum and current research findings.

With regard to advising parents on their children's future educational needs, the Board agrees that post-primary schools should make available to primary schools all relevant information which will enable them to better inform parents.

The Board would highlight the need for training for primary principals and teachers on post-primary provision, including the range of post-primary opportunities and pathways.

The Board feels that supplementary information should be made available from other sources, including the Department and Education and Library Boards.

The Board is aware of the resource implications of the proposals which will require additional time and resources to allow teachers and principals to complete the necessary administration procedures. Currently schools receive funding to provide substitute teacher cover for the period of the transfer interviews in Year 7. The new proposals require interviews in Year 6 with regard to the Pupil Profile and interviews in Year 7 to nominate preferences. The government should be aware of the increased bureaucratic burden placed on schools and be prepared to fund this additional expenditure to ensure that teaching time does not suffer.

The Board would agree that primary principals should continue to offer general advice and guidance to parents and pupils on "choice" but that they should not recommend specific schools. The Board believes that the final "choice" of post-primary school must remain with parents and pupils.

The Board would seek clarification from the Department as to the process, procedures, roles and responsibilities for the Quality Assurance of the Pupil Profile.

The Board also requests/seeks guidance from the Department on the management of cases where parents do not attend annual parent consultations and on how schools might deal with parents who do not accept the schools' advice.

The Board would welcome clear guidance as to how disputes might best be managed to avoid litigation and cases being taken by parents or by the child at a later date against a school or indeed by a child against a parent.

Question 4 Advice from the Post-Primary School

The Department is seeking your views on:

- (a) the range of information outlined in the Consultation Document to help parents make informed decisions;**
- (b) the role of the post-primary school in advising parents; and**
- (c) whether any other information/support should be provided to parents to assist the decision-making process.**

Prospectuses should include details of 'pathways' available to pupils via academic or vocational routes.

The Board believes that the post-primary school role in 'providing advice' could prove contentious with potential for litigation. Therefore, the process should be consistent and clear guidelines should be agreed on the extent and range of information expected beyond the current headings.

The Board agrees with the information to be provided in the post-primary prospectus, as set out by the 2003 regulations with the suggested additions on the Entitlement Framework, focus of the curriculum and progression routes within and beyond the school. While recognising that the range of information on schools has evolved and will continue to evolve over time, the Board would welcome a greater emphasis on and further review of information provided on the 'school ethos' and the strengthening of the information currently available to include school policies.

The Board supports the use of school prospectuses, open days/evenings and other opportunities for informing transferring pupils such as shadowing Year 8 pupils.

The Board is not in favour of formalising, into the procedure, one-to-one meetings with the post-primary school. The present system allows for meetings to take place informally, where necessary. If formalised into the procedure parents could feel pressurised into attending these meetings as well as attending Open Nights/Days. This could result in a disadvantage for families who are unable to attend such meetings through family or work patterns circumstance or finances. Further each post-primary school would have to arrange interviews for all potential preferences thus creating a massive and costly burden on schools. It could also result in raising parental expectations in the case of oversubscribed schools. This proposal could give rise to a substantial increase in the number of appeals particularly where principals make any comment on the suitability/non-suitability of the school for individual pupils.

The Board is concerned with the Department's departure from its initial advice that the Pupil Profile would not be used for selection purposes. The Board would not be in favour of the Pupil Profile being given to the post-primary school in advance of any meeting.

The Board supports the proposal that parents should have access to information all year round so that transfer is not concentrated in the last few weeks and would therefore encourage post-primary schools in the short-term to make information relating to their school available on-line. The Board would be of the view that in the long-term all post-primary schools should make this information available on-line throughout the year. The on-line information should however supplement and not replace the prospectus.

Question 5 Advice from DE/Education and Library Boards

The Department is seeking your views on the information/advice which should be available from DE/Education and Library Boards to help parents choose the most suitable post-primary school.

The Board should continue to provide information and guidance on the different stages of the transfer process, the roles of the parents and other stakeholders, including primary schools, post-primary schools, Education and Library Boards and the Department.

The Board should provide the transfer booklet with information on the process, descriptions of each school and their admissions criteria.

The Board welcomes acknowledgement by the Department of the support already provided by the Education and Library Board Transfer Officers to parents to help them through the admissions process.

While acknowledging that the Transfer Officers should continue to be accessible to parents and provide factual information, through a help-line during the transfer process supported by extensive web-based information, such a help-line and web-based information, would have to be resourced and staffed at an appropriate level and not an 'add-on' to existing commitments.

The Transfer Officers are also responsible for admission to primary and pre-school and the subsequent appeal procedure. Account would have to be taken of the diverse procedures operating. These admissions procedures and processes for the latter should be reviewed to ensure greater consistency and accessibility for parents.

The current Transfer Booklet should be reviewed in light of strengthened prospectuses and development of web-based information. All school-based information could be obtained directly from the school with the Education and Library Boards/Department providing an overview of the procedure. Education and Library Boards would still require admissions criteria but the possibility of only publishing electronically and thus saving printing costs should be examined though this may give rise to equality of access issues.

The Department and Education and Library Board websites could provide a central portal through which parents could access the websites for schools in the local area.

The Education and Library Board would provide information and advice on procedure and information on the post-primary schools.

Question 6 Continuing Advice during Post-Primary Education

The Department is seeking your views on what information/advice should be available to assist the choices of educational pathway, during post-primary education.

The Board agrees that the Pupil Profile should provide a more structured basis for the informed ongoing dialogue (throughout the child's education) to ensure that needs and aspirations are being met.

The Board supports the proposal that there should be a range of advice including discussion informed by the Pupil Profile with the school, careers guidance from the school and the Careers Service of the Department for Employment and Learning and, where appropriate, advice from the Board.

The discussion of appropriate educational pathways and settings is particularly important at the end of Key Stage 3 at age 14 and Key Stage 4 at age 16 which mark the child's transition from general to more differentiated provision.

The Board believes that "the choice of post-primary school at age 11 should not necessarily be the only or final determinant of a child's educational pathway until they leave school" and that post-primary education needs to be sufficiently flexible to respond to the child's changing needs, and alert to whether a child is struggling or not being sufficiently challenged.

Question 7 Timetable for the Admissions Process

The Department is seeking your views on the broad timetable for the new admissions procedure.

In the first year there will be an overlap where Transfer Officers will have to manage existing and new procedures alongside Open Enrolment, primary and pre-school procedures and appeals. All admission timetables must be clearly established and integrated to ensure delivery. It is essential that resources are made available and appropriate structures put in place to permit delivery of services.

The Board has reviewed the timetable and makes the following observations:

- April: Admission and Enrolment Numbers need to be agreed by April.

- May/June: Overlap of appeals and information gathering of admissions criteria are traditionally two very busy periods.
- September : Concerns with regard to tight deadline for gathering information, publishing and distributing Transfer Booklet. However, if earlier recommendations with regard to format of Transfer Booklet are implemented these concerns would be alleviated.
- November: 4 weeks would not be long enough to provide time for school discussions with parents and pupils. However, if previous recommendations are implemented this would not happen.
- December: Timetable tight for receipt and processing of Transfer Forms.
- Timetable should include consideration of Compelling Individual Circumstances (CIC)
- June deadline for appeals welcomed. This should facilitate attendance by both school and parents and curtail uncertainty for parents.
- March: Parents receive letter from school into which child has been accepted. The Board recommends that the Department explore the possibility of schools sending out acceptance letters rather than Boards. Schools currently send out letters with regard to induction arrangements, uniforms etc. This would eliminate duplication and save costs.
- May/June: Concerns with regard to pressure of time and space and staff in post-primary schools to provide induction for new pupils in May and June during school, end of key stage and public examinations, including GCSE, non-GCSE, AS and A2 examinations, as well as annual parent meetings to discuss progress.

CHAPTER 4 PUPILS WITH COMPELLING INDIVIDUAL CIRCUMSTANCES OR A STATEMENT OF SPECIAL EDUCATIONAL NEED

Question 8 Compelling Individual Circumstances

The Department is seeking your views on the types of cases which should be considered as compelling individual circumstances.

The Board agrees that sufficient provision and flexibility within the new arrangements are required to ensure that the requirements of children with specific needs, which can only be provided for at particular mainstream schools, are met.

The Board welcomes the Department's confirmation that Compelling Individual Circumstances relate to circumstances affecting a child that are "so compelling that they necessitate a child's attendance at a particular named school rather than another" and that cases most likely to be considered are those involved with "looked after children" and children with serious medical illness who require to be near a hospital or have access to a nurse on site.

While agreeing that it is not possible to produce a definitive list, the Board proposes that the Central Panel should adjudicate according to a limited range of criteria drawn up by the Department and have discretion in to respond to individual cases.

The Board would seek clarification as to whether or not there is right of appeal against the decision of the Central Panel.

While agreeing that there should be sufficient flexibility to respond to individual cases, and while the Board recognises that there will always be compelling individual circumstances, it would highlight the need for external verification of the existence or otherwise of those circumstances to confirm the validity of those claims. The Board therefore welcomes the proposal that there should be "strong and equivocal documentary evidence from a statutory body to support any claim".

The Board agrees that a Compelling Individual Circumstance should be one that dictates attendance/non-attendance at a particular school(s) on the grounds of personal safety and should not include educational arguments.

It is essential that Compelling Individual Circumstance be endorsed by the school in question and that it is subject to the overriding principle that the child is placed in a school which can offer him/her a form of education which is best suited to his/her needs and aptitudes and afford him/her the opportunity to develop his/her potential to its fullest.

The Board would caution that, when considering such cases, due care and attention should be given to the "actual" number of children in the year group, especially those who are supernumerary and in particular the issue of health and

safety with regard to class size in practical subjects, the number of specialist rooms and the availability of specialist teachers.

Question 9

The Department is seeking your views on whether pupils admitted under compelling individual circumstances should be supernumerary to schools' admissions and enrolment numbers.

Admissions and enrolment numbers broadly reflect the physical capacity of schools. It is therefore important that as far as possible the actual enrolment number reflects that capacity.

The Board believes that admissions of even small numbers of pupils with Compelling Individual Circumstances as supernumerary cases would have an impact on class size and could create difficulties for the internal management arrangements of practical classes, as well as staffing and resources. There could also be a possible impact on neighbouring schools. For this reason, the Board is of the view that Compelling Individual Cases should not be supernumerary.

The Board also recommends that the procedure and timing of consideration of these cases, which have not been included in the timetable, are addressed by the Department.

Question 10

The Department is seeking your views on whether individual Boards of Governors or a Central Panel should consider cases of compelling individual circumstances. If a Central Panel, your views are sought on its size and composition (see paragraph 4.7).

The Board supports the proposal for a Central Panel to consider cases of Compelling Individual Circumstances.

The Board agrees that such a Panel "could bring consistency, objectivity and the necessary expertise required to consider what are often sensitive and problematic cases involving medical/psychological issues". (para 4.7)

The Board proposes that the Central Panel consist of three to five members - a legal practitioner; a medical practitioner/social worker; an educationalist, the principal (or nominated deputy from the school in question) plus a clerk.

There should be a regional pool of Panel members to serve the five Boards, clerked on an individual Board basis.

Criteria should be drawn up by the Department to assist the Panel in its decision making process.

The timing of Panel meetings is crucial, as these cases must be dealt with before other applications are considered, regardless of whether or not they are supernumerary.

Question 11 Pupils with a Statement of Special Educational Need

The Department is seeking your views on whether pupils with statements of special educational need should continue to be admitted as supernumerary.

The Board supports the continuation of the admission of pupils with a statement of special educational need, as supernumerary.

Statemented children are not subject to the normal admissions arrangements under Article 16(5)(b) of the Education (NI Order 1996) which provides that if a grant-aided school is specified in the statement maintained by the Board, the Board of Governors of that school shall admit the child to the school.

Pupils who are statemented should be admitted as supernumerary. The alternative would require all schools to provide that the first criterion for selection is that the pupil has a statement of special educational needs.

In accordance with the Education (NI) Order, the Code of Practice on the Identification and Assessment of Special Educational Needs (1998) page 48 Point 4.44 states:

“There may be instances where the admission of a child with a statement to a mainstream school will take the school over its approved admissions number or enrolment number for that year. The statutory requirements relating to approved admissions and enrolment numbers do not apply to children with statements, and Departmental approval to such admissions is not therefore required.”

If the admission of statemented pupils as supernumerary were to be discontinued, the following issues may arise:

- There may be difficulty in accessing places for pupils with statements.
- Statemented pupils may be treated unfavourably.
- Statemented pupils may be substantially disadvantaged.
- Bureaucracy would increase in relation to seeking Departmental approval in relation to admission numbers and class sizes.

The implementation of SENDO, and the potential increase in demand for places for statemented children in mainstream schools, will lead to possible difficulties in relation to:

- Physical capacity of the school.
- Class size – an increase in the number of people in classrooms, because many children will have classroom assistants. This could be a health and safety issue especially in subjects where the maximum size of class is determined by the Department e.g. Home Economics and Technology.

The Board would support the continuation of supernumerary status because of the difficulty with current statementing and transfer timetables. However, schools should be able to take account of the presence of the pupil when considering admission requests to the year group.

The Board believes that the Department should review and set regularly, enrolment numbers, admissions numbers, physical capacity and, in particular, the actual numbers which include pupils with a statement of educational needs.

CHAPTER 5 ADMISSIONS CRITERIA FOR OVERSUBSCRIBED SCHOOLS

The SEELB welcomes the Department’s proposal to streamline and simplify the admissions process where currently “there is limited consistency in how the criteria are defined or applied” which makes the process “complex for parents to understand” (para 5.2) and to draw up a “menu of admissions criteria” from which schools should choose when oversubscribed.

The Board agrees in principle with the 3 broad categories of criteria (family-focused, community-based, geographical) and accepts the need to have agreed and transparent tiebreakers.

Question 12 Family-Focused Criteria

The Department is seeking your views on family-focussed criteria listed and their inclusion within the menu.

The SEELB believes that schools should be family-focused and agrees with the two proposed family-focused criteria - siblings currently at the school and eldest or only child.

The Board believes that there are practical domestic, social and emotional reasons why a family with pupils at a particular school should be given preference and encouraged to keep children at the one school.

The Board would question the rationale behind why the eldest child should be given priority over a child whose family had attended the school but, because of age gap, had left. Where schools have used this second criterion, parents with siblings previously at the school have found the logic difficult to comprehend.

The Board would see no merit in any other family relationship apart from sibling as a principle criterion.

The Board agrees that children without older siblings should not be disadvantaged.

In the case of single-sex schools, the eldest child of that gender should not be penalised because the eldest child in the family may have attended another school.

The Board would point out however that the changing nature of what constitutes a family means the definition of eldest child is proving increasingly difficult to define, as illustrated in recent High Court cases. If 'eldest child' is to remain as a criterion, careful definition would be required.

The Board would also wish to ensure that a child is not disadvantaged because an older sibling has a statement of special educational need.

Question 13 Community-Based Criteria

The Department is seeking your views on the community-based criteria listed, their inclusion within the menu and how they should be defined.

The Board acknowledges that many schools serve their local community. The Board therefore broadly supports the criteria of feeder primary schools and parish which reflect historical patterns of enrolment and local communities and which are widely used at present by schools.

The Board supports feeder primary schools provided guidance is given from the Department as to the designation of feeder primary schools. The Department would have to ensure that the use of this criterion is robust enough to ensure that these criteria are effective, fair and transparent and to withstand equality legislation.

The Board concurs with the Department that it is important for schools not to name so many feeder primary schools or parishes that the community basis of the criteria becomes meaningless and, that from an equality point of view, some primary schools are inadvertently excluded.

Question 14

The Department is seeking your views on:

- (a) the geographical criteria listed, their inclusion within the menu and the most appropriate means of operating them; and**
- (b) what percentage limit, if any, should be set for places allocated by geographical criteria.**

The Board does not support the school-centred catchment criterion which proposes giving priority to pupils who live within a defined area. The Board views this as potential admission by postcode. The Board agrees that there would be potential for difficulties arising from overlapping boundaries and disadvantage caused to children because of gaps between adjacent areas. Additional mechanisms would need to be put in place to ensure this does not happen.

The Board supports the child-centred catchment criterion which, by ensuring that each child is given priority for a place at their closest suitable school, is in line with the first principle which puts "the interest of the child at the centre of all decision making".

The Board concurs with the benefits as identified by the Department in terms of practicality and costs. The Board would add to the potential benefits in terms of the pupils' health for those walking or cycling to their school.

The Board agrees that parents and pupils will need to receive clear information and maps measuring the catchment area well in advance of completing the Transfer Form.

It is the view of the Board that percentage limits are difficult to apply and likely to result in an increase in appeals due to their non-transparent nature.

The Board also feels that it is particularly difficult to respond vis-a-vis to the geographical and community based admissions criteria due to the uncertainty regarding the future post-primary educational infrastructure.

Question 15 Tiebreakers

The Department is seeking your views on:

- (a) the tiebreakers, random selection and proximity from home to school, as a means of admitting pupils down to the last available place;**
- (b) the most appropriate method of operating random selection and/or measuring proximity; and**
- (c) whether schools should be free to use different methods of operating random selection or proximity**

The Board acknowledges that, although most children will be admitted to post-primary schools on the basis of the criteria already considered, the admissions criteria must be capable of admitting pupils down to the last available place. A tiebreaker criterion will be needed to facilitate particular decisions.

The Board would support random selection by surname as the preferred option for reasons stated in paragraph 5.14. The letters of the alphabet are selected in random order by computer and published in the Transfer Booklet in advance of the transfer process so that parents could make an informed decision. Pupils are offered places on the basis of the initial letter of the surname in the order set out in the Transfer booklet. Care should be taken with M's and Mc's.

The Board feels that the criterion of proximity from home to school or distance is contentious, could be expensive (if Ordnance Survey or geo-mapping techniques are needed to measure distances) and can only delay decisions for schools. This could potentially disadvantage children living in rural areas and not resident within close proximity to post-primary schools.

The Board does not support any form of random lottery as it is not transparent.

The Board contends that, in the interest of consistency and transparency, all schools should be required to use the same process for randomly selecting pupils.

Question 16 Other Criteria

The Department is seeking your views on any other criteria that you believe should be included in the menu, bearing in mind the principles and objectives outlined in Chapter 2.

All major criteria have been identified.

If the 'eldest child' is used as a criterion it is essential that a child with an elder sibling, who has a statement of special educational needs, is not penalised. In the case of single-sex schools, the eldest child of that gender should not be penalised because the eldest child in the family may have attended another school.

In the case of single-sex schools, the second child should not be penalised

Criteria for children living outside Northern Ireland e.g. Irish Republic and children living within Northern Ireland whose parents are not EU nationals, should be clearly defined by the Department in consultation with the Immigration Department.

The Board recommends that the Department clarify whether or not children moving into an area should be given special consideration as they will not readily meet the criteria outlined in the menu.

The Board would not support the use of interviews for admissions as they cannot be standardised over the time period and are open to claims that they assess aptitude, ability or social circumstance.

Particular difficulties which arise should be dealt with by the admissions support body in consultation with the Department with regard to variations in admissions or enrolment numbers.

Question 17 Format of Menu

The Department is seeking your views on the possible options for the menu.

As outlined earlier the Board agrees with the four main categories as outlined in the menu.

CHAPTER 6 ADMISSIONS APPEALS

Question 18

The Department is seeking your views on whether the process for appealing the decisions of BOGs not to admit a child to the school should be altered in any way.

If implemented the Central Panel's consideration of Compelling Individual Circumstances will impact on the current admissions appeals process. There is a lack of clarity on how appeals relating to CIC will be dealt with.

It is recommended that a review of the whole admissions appeals procedure should take place after revised procedures for admissions arrangements have been established and implemented.

Consideration could be given to a single set of regulations governing the membership of admission and expulsion appeals tribunals.

Consideration should also be given to alignment of the Central Panel and Admissions Appeals Tribunals.

OTHER ISSUES

Are there any other issues you would like to comment on in relation to new admissions arrangements for post-primary schools? If so, please use the box below.

The Board recommends that procedures for transfer between Schools in Years 9-14 should be reviewed.

The Board further proposes that regulation should be set in place to require proof of address in any application.

The Board suggests that the existing parental preference system should be maintained.

The Board proposes that the same admissions criteria should apply to entry to schools during and subsequent to entry in Year 8.

Do you think any of the issues contained in the Consultation Document would have any adverse implications for any of the Section 75 categories?

Yes.

The Board believes that the criterion using feeder primary schools could impact on persons of different religious belief.

CONCLUSION

The South Eastern Education and Library Board has maintained consistently the view that developing the unique attributes of each young person should lie at the heart of our education system. Therefore the Board's aim has been to identify clearly the curriculum and structural arrangements necessary to encourage and support an enrichment of the quality of life for individuals, local communities and society through co-operation, mutual respect and partnership. The Board believes that the comments and proposals offered throughout this response would create such an education system; one that is of the highest quality as well as the most appropriate for all young people in Northern Ireland.

The abolition of the transfer test and its replacement by a new common curriculum for all pupils in years 1-10 realises and puts into practice the Board's aim.

For reasons of equity, equality of opportunity and excellence, the Board has concluded that progression from a Year 1 to Year 10 all-ability school system, to one of a range of types of post Year 10 provision should occur at age 14. The introduction of a lifelong learning profile would facilitate progression by choice through guiding and informing pupils, parents, teachers and schools.

The Board is firmly of the opinion that any changes to the admissions arrangements, as for the post-primary system, should be gradual and planned carefully to take account of the demands which will be placed on teachers, pupils, parents, governors and Boards.

The Board recognises that the review of the admissions arrangements, post-primary education and the curriculum are inextricably linked. However, it is important to emphasise that any decisions about future post-primary structures should follow on from agreement about the aim and new objectives of the curriculum. Likewise new admissions arrangements should follow on from agreement about post-primary structures.

Successful change in post-primary education will only be possible if the resource implications are fully addressed. The Board would wish to emphasise that, in the interests of creating genuine parity of esteem for schools, extra funding will need to be made available.

The Board does not underestimate the challenges which these comments and proposals will present. However, the Board looks forward to working with all those concerned in shaping the future structure, content and, above all, the purpose of the education system for young people in Northern Ireland.