



Determination

Case reference: ADA3764

Objector: The Roman Catholic Diocese of Nottingham

Admission authority: Lionheart Academies Trust for Beauchamp College

Date of decision: 25 June 2021

Determination

In accordance with section 88H(4) of the School Standards and Framework Act 1998, I uphold the objection to the admission arrangements for September 2022 determined by Lionheart Academies Trust for Beauchamp College, Leicestershire.

By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code requires the admission authority to revise its admission arrangements within two months of the date of the determination.

The referral

1. Under section 88H(2) of the School Standards and Framework Act 1998, (the Act), an objection has been referred to the adjudicator by the Roman Catholic Diocese of Nottingham (the objector), about the admission arrangements (the arrangements) for Beauchamp College (the school), an academy school for boys and girls aged 11 to 19, for September 2022. The objection is to the inclusion of Saint Thomas More Catholic Voluntary Academy as a feeder primary school.
2. The local authority (LA) for the area in which the school is located is Leicestershire County Council. The LA is a party to this objection. Other parties to the objection are the school, Lionheart Academies Trust (the trust), Saint Thomas More Catholic Voluntary Academy (St Thomas More), St Thomas Aquinas Catholic Multi-Academy Trust, which is the academy trust for St Thomas More, Leicester City Council, which is the local authority for the area in which St Thomas More is located, and the objector.

Jurisdiction

3. The terms of the Academy agreement between the multi-academy trust and the Secretary of State for Education require that the admissions policy and arrangements for the academy school are in accordance with admissions law as it applies to maintained schools. These arrangements were determined by the Lionheart Academies Trust, which is the admission authority for the school, on that basis. The objection was submitted to these determined arrangements on 23 March 2021. I am satisfied the objection has been properly referred to me in accordance with section 88H of the Act and it is within my jurisdiction.

Procedure

4. In considering this matter I have had regard to all relevant legislation and the School Admissions Code (the Code).

5. The documents I have considered in reaching my decision include:

- a. a copy of the minutes of the meeting of the academy trust at which the arrangements were determined;
- b. a copy of the determined arrangements;
- c. the objector's form of objection dated 23 March 2021;
- d. the trust's response to the objection;
- e. the responses of the other parties to the objection;
- f. details of the consultation on the arrangements and responses received;
- g. Leicestershire and Leicester City LAs' online composite prospectuses for admissions to secondary schools in September 2022;
- h. information about admissions to the school in September 2020 and September 2021;
- i. information about applications made by parents of children at St Thomas More for admission to secondary school in September 2020 and September 2021 and the schools to which those children were allocated places;
- j. maps of the area identifying the extent of the school's catchment area and other relevant schools; and
- k. determinations of adjudicators in relation to the school dated 12 September 2018 and 6 August 2019 (case references: ADA3472 and ADA3499).

The Objection

6. The objector's representative argues that the inclusion of St Thomas More as a feeder primary school is "unreasonable" and "unfair". He also says that the arrangements breach the Code "by failing to have the approval of the relevant religious authority for the school", that is, the Roman Catholic Diocese of Nottingham (the diocese).

7. With respect to the argument that the inclusion of St Thomas More as a feeder school is unreasonable, paragraph 1.15 of the Code requires that,

"The selection of a feeder school or schools as an oversubscription criterion **must** be transparent and made on reasonable grounds,"

In relation to unfairness, paragraph 14 of the Code states that,

"admission authorities **must** ensure that the practices and the criteria used to decide the allocation of school places are fair, clear and objective."

Background

8. Beauchamp College is a large secondary school with over 2300 pupils on roll. It is located in the town of Oadby on the outskirts of Leicester but in the local authority area of Leicestershire County Council rather than Leicester City Council. It has a Published Admission Number for admission to year 7 of 300. For admission in September 2022, the oversubscription criteria can be summarised as follows:

- (i) Looked after and previously looked after children.
- (ii) Children who attend a 'Learning Partner Primary School'.
- (iii) Children who attend a 'feeder Primary School'.
- (iv) Children who have siblings at the school.
- (v) Children who live in the catchment area.
- (vi) Children of staff at the school.
- (vii) Other children prioritised by distance from the school.

If there are more children than available places, subsequent oversubscription criteria are used in combination to decide which children are admitted. I explain this process in more detail in paragraph 24 below.

9. The 'Learning Partner Primary Schools' are eight schools that have what the school describes as a "historical relationship with Beauchamp". Children from these schools "have traditionally all moved through to Beauchamp". The school explains,

“this is the group of schools with whom we originally designed the KS3 curriculum and who we support with a range of learning activities.”

The ‘feeder Primary Schools’, of which there are five, including St Thomas More, are “all other primary schools who are in our catchment.” Following a period of consultation, St Thomas More was added as a feeder primary school for admission in September 2022.

10. The school’s catchment area comprises an area of Leicestershire that is extensive, as well as a relatively small part of Leicester, which is urban in character and lies within the boundary of Leicester City LA. The eight Learning Partner schools all lie within Leicestershire. Four of the five feeder Primary Schools, including St Thomas More, are located within Leicester City. A map of the catchment area appears in paragraph 25 below.

11. The oversubscription criteria were considered by the adjudicator in 2019 in case ADA3499. He found that no unfairness was created by the ordering of the criteria, which give a higher priority for attendance at the two categories of feeder schools than for siblings and other children living in in the catchment area. I am entirely in agreement with this conclusion. My consideration is restricted solely to whether the inclusion of St Thomas More as a feeder primary school complies with the requirements relating to admissions.

Consideration of Case

12. The objection explains that St Thomas More is a “partner primary school” of St Paul’s Catholic Academy, a secondary school in Leicester that is also part of the St Thomas Aquinas Catholic Multi-Academy Trust. It says that Beauchamp College has never been a partner for St Thomas More and that its inclusion as a feeder school is against the wishes of both the diocese and the governing board of St Thomas More. The diocese sets out its reasons for opposing the addition of St Thomas More as a feeder school for Beauchamp College as follows:

“They [Catholic schools] were established to provide Catholic education for children of all ages and the relationship between local Catholic primary and secondary schools established from their inception is fundamental and sacrosanct. They form together a family of schools with a deep and shared common heritage and set of beliefs. As such, Catholic primary schools are always named as partner primaries for their Catholic secondary schools and Catholic secondary schools do not name any other non-Catholic primary schools as feeder schools.

The position of the Diocese of Nottingham, as it is in all other Catholic dioceses in England, that where there is a local Catholic secondary school, we will not approve a Catholic primary school being named as a feeder school for any non-Catholic secondary school as that would be a step towards undermining the special relationship that exists between the Catholic primary and secondary schools.”

13. St Thomas Aquinas Trust and the governing board of St Thomas More make similar points. Both confirm their opposition to the naming of St Thomas More as a feeder school and state that there is no relationship between St Thomas More and Beauchamp College.

They emphasise the long-established and close partnership between St Thomas More and St Paul's Catholic Academy, which includes,

“regular events hosted at St Paul's for pupils from St Thomas More (recently restricted due to Covid-19 restrictions of course); shared planning and professional development activities between the staff of the two schools; and a strong, embedded transition programme between the schools.”

Concern is also expressed about the consultation process and the potential unfairness of giving a higher priority for children who attend St Thomas More but live much further from Beauchamp College than some children who do not attend feeder schools.

14. The objection raises a number of issues that I will consider in turn. First, I briefly address the objector's contention that the school's failure to obtain the agreement of the diocese to the naming of St Thomas More as a feeder school was a breach of the Code. There is, in fact, no such requirement. The Code does, in paragraph 1.38, require schools designated with a religious character to have regard to any guidance provided by its religious body when constructing faith-based admission arrangements and to consult that body when deciding how membership or practice of the faith is to be demonstrated. There is, however, no scope for the religious body of a school with a religious character to approve the inclusion of that school as a feeder school, or in any other way, within the oversubscription criteria of another school. In addition, the diocese has no jurisdiction over Beauchamp College which, of course, is not a school with a religious character. I do not uphold the objection on this ground.

15. Second, although not mentioned in the objection itself, both St Thomas More and the St Thomas Aquinas Trust criticise the consultation that the school undertook prior to making the decision to add St Thomas More as a feeder school. Both parties say they were unaware of the proposal before the consultation period began. Reference is also made to the small number of responses not justifying the outcome determined by the school.

16. There is no requirement in the Code for admission authorities to contact parties who might be affected by proposed changes to their arrangements to inform them that they intend to consult on those changes. It might be considered a matter of courtesy; indeed, the school apologised to the diocese and the St Thomas Aquinas Trust for not informing them of the consultation prior to its start date. It has not been suggested that the consultation did not meet the requirements set out in paragraphs 1:42 – 1.45 of the Code. A total of 229 responses was received, of which the majority were from parents of prospective pupils. Nearly 60 per cent (137) expressed support for the proposal to include St Thomas More as a feeder school for admission in September 2022; 92 were against the proposal. Within these figures, a large majority of prospective parents (109 to 29) supported the proposal, whereas parents of current pupils at the school (32 to 16) and primary school staff (31 to 12) did not support the change.

17. The consultation format did not ask prospective parents to identify the school their children currently attended. The diocese points out that it is therefore impossible to be certain how parents at St Thomas More responded, although in a letter to stakeholders,

Beauchamp College does make mention of a letter received prior to the consultation, signed by 45 parents, arguing for St Thomas More to be listed as a feeder school. The St Thomas Aquinas Trust suggests that for a school of Beauchamp's size, the level of response to the consultation did not,

“suggest anything like a reasonable mandate to change a process which has been well-established over many decades and which is fundamental to the sequential, progressive Catholic education”.

18. All parties acknowledge that the consultation is not a referendum. Minutes of the Lionheart Academies Trust indicate that the trustees gave consideration to the results of the consultation and the arguments put forward on both sides, before determining the arrangements. I find that the consultation process met requirements.

19. Third, the objector also alleges that the arrangements are “unfair”. The objection does not spell out what is meant by unfairness but, in the context of admissions, arrangements may be considered unfair when their effect is to disadvantage a particular group of children. This could occur if such a group were unable to obtain places at a school and there was no alternative school within a reasonable distance. In the context of a school that is oversubscribed, as Beauchamp College is, the granting of a higher priority to potentially 40 children (the PAN for St Thomas More) may well make it difficult for siblings and others in the catchment area who do not attend feeder schools to gain admission.

20. The adjudicator considered a similar argument in ADA3499 and reached the conclusion that there was no convincing evidence that children living in the catchment area who did not obtain a place at Beauchamp College would be unable to obtain a place at an alternative local school. In fact, there are two other secondary schools located within Beauchamp College's catchment area: Gartree High School and Manor High School. In ADA3499 the adjudicator concluded that the arrangements were not unfair in their effect. I have not been presented with any evidence that is at odds with that conclusion. Therefore, I do not uphold the objection on this ground.

21. Finally, I turn to what I consider to be the most substantial aspect of the objection, that is, that it is unreasonable, contrary to paragraph 1.15 of the Code, for St Thomas More to have been selected as a feeder school. This paragraph requires the selection of feeder schools to be “made on reasonable grounds.” In order for grounds to be considered reasonable, the admission authority must be able to articulate a legitimate reason (or reasons) for the selection; that reason must not be irrational or illogical.

22. The admission authority explains its reason for wishing to include St Thomas More as a feeder school in two principal ways. First, it points out that St Thomas More is the only primary school in its catchment area that was not included as a feeder school under either the second or third oversubscription criterion. Its adoption as a feeder school will mean “that the parents and children from St. Thomas More Primary School will now be on an equal footing as others in the catchment area.” Second, the minutes of the trust board explain that it “provides the parents with an additional choice of schools in the context of a national

commitment to parental choice.” The school says it considers “fair parental choice to be extremely important.” Reference is made to paragraph 1.8 of the Code, which reads,

“Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs.”

In a letter to the diocese, it shares a question posed in a letter received from a parent of a child at St Thomas More:

“Can St Thomas More / Diocese object to being listed on the basis of only wanting to link to Catholic Secondary Schools? Would this not be discrimination on the basis of faith?”

23. Beauchamp College has been oversubscribed for a number of years. For admission in September 2020, 147 applicants were refused a place. As Table One shows, only one child was allocated a place solely on the basis of living in the catchment area; of course, many of those admitted under higher criteria (such as attending a Learning Partner School) would also have lived in the catchment area.

Table One: Places allocated at Beauchamp College for admission in September 2020

Oversubscription criterion	Number of places allocated
1. Looked after and previously looked after children	1
2. Children who attend a Learning Partner School	247
3. Children who attend a feeder school	35
4. Siblings of children at the school	11
5. Children living in the catchment area (the child admitted lived 0.051 miles from the school)	1
6. Children of staff	0
7. Other children	0
TOTAL (including six children with an Education, Health & Care Plan naming the school)	301

24. For admission in September 2021, it was not possible to allocate places to all children attending feeder schools, and there were 187 refusals.

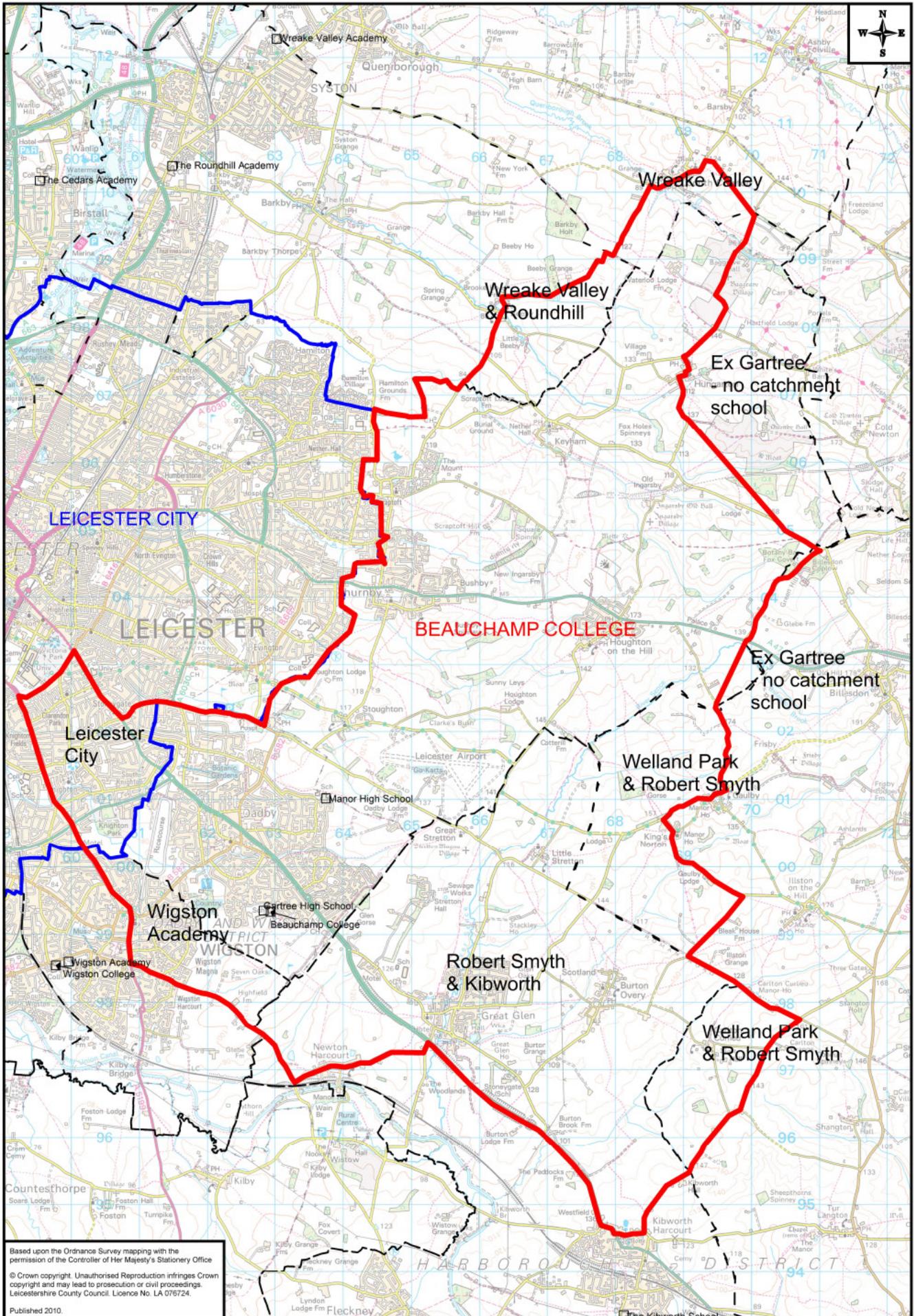
Table Two: Places allocated at Beauchamp College for admission in September 2021

Oversubscription criterion	Number of places allocated
1. Looked after and previously looked after children	1
2. Children who attend a Learning Partner School	263
3. Children who attend a feeder school (the last child admitted lived 2.584 miles from the school)	32
4. Siblings of children at the school	0
5. Children living in the catchment area	0
6. Children of staff	0
7. Other children	0
TOTAL (including four children with an Education, Health & Care Plan naming the school)	300

Within the third criterion, places were allocated in accordance with the provision in the arrangements that subsequent criteria are used in combination. Of course, all of the children allocated places under this criterion attended a feeder school. Six places were allocated to children who both had a sibling at the school and lived in the catchment area; one place was allocated to a child with a sibling at the school who did not live in the catchment area; one place was allocated to the child of a member of staff; 18 places were allocated to children living in the catchment area; the final places were allocated on the basis of distance from the school to children living outside the catchment area.

25. Map One (below) shows the extent of the Beauchamp College's catchment area. The red line indicates the border of the catchment area. The broken black lines show the catchment areas of other schools in Leicestershire. The blue line indicates the boundary of Leicester City LA, which is surrounded on all sides by Leicestershire.

Map One: Beauchamp College's catchment area



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 Published 2010.

26. It is clear from the map that the school catchment areas do not fit together neatly like a jigsaw, with each school having its own discrete area, as is the case in many parts of the country. The catchment area for Beauchamp College overlaps substantial parts of the catchment areas of other schools, including secondary schools in Leicester City. This pattern is partly explained by the fact that historically the structure of schooling in this part of Leicestershire was three-tier. In the Oadby area there were two high schools (Gartree High and Manor High) that accommodated children in years 6 to 9 and Beauchamp College for years 10 to 13. Following reorganisation, all three of these schools now admit children to year 7. Gartree and Manor High Schools do not have catchment areas. Most of their places are allocated to children attending named feeder schools, many of which are the same primary schools listed as feeder schools for Beauchamp College.

27. Tables One and Two show that, as far as providing priority for admission solely on the basis of residence is concerned, Beauchamp College's catchment area serves almost no purpose. One child, who lived 51 metres from the school, was admitted under the catchment area oversubscription criterion for admission in September 2020. For admission in September 2021, it was not possible to allocate places to all children attending feeder schools, so no children living in the catchment area but not attending a feeder school were allocated places. The adjudicator's determination in case ADA3499 indicates that this was also true of admissions for September 2019. The LA has confirmed that "it would be reasonable to expect the pattern of allocation of places for admission to year 7 in September 2022 broadly to match that in September 2021."

28. I find it odd that the school justifies the inclusion of St Thomas More as a feeder school on the basis that it is located within its catchment area. The purpose of a catchment area, it appears to me, is to give priority for places to children living within it and to ensure, as far as possible, that no child has an unreasonably long journey to school. Although residence in a school's catchment area can never guarantee that a child will obtain a place at the school, catchment areas do provide a strong indication of the community the school wishes to serve.

29. As the adjudicator pointed out in ADA3499, the sum of the PANs of the eight Learning Partner Schools is 400 and that for the four other schools named as feeder schools is 300. The inclusion of St Thomas More would increase the latter figure to 340 and the total to 740. Clearly, Beauchamp College, with a PAN of 300, does not expect all children living in its catchment area to be able to attend the school. This itself is not surprising in the circumstances of this particular school, not least because there are two other secondary schools effectively serving the same area. The higher priority given to feeder schools in the arrangements means that, in practical terms, the main function of the catchment area of the school is to provide a reason for the selection of feeder schools.

30. If a child attends a Learning Partner or feeder school, the priority given to them under the second or third oversubscription criteria does not depend upon their living in the catchment area. It is attendance at the feeder school that confers the priority, not the child's residence, although if there are more children than places remaining under these criteria, the "combination of criteria" process will mean that those living in the catchment

area are more highly ranked. The headteacher of St Thomas More has provided figures showing that, of the children currently in year 5, the year group that will be transferring to secondary school in September 2022, 19 live in the catchment area of Beauchamp College and 20 do not. In the determined arrangements for admission in September 2022, all of these children would be considered under the third oversubscription criterion. St Thomas More is approximately a 2.9 mile road journey from Beauchamp College. The last child admitted under the feeder school criterion for admission in September 2021 lived 2.584 miles from the school in a straight line. There are locations (and, indeed, other primary schools) located closer to the school than this, notably in Wigston, that are outside its catchment area. On the other hand, there are also many parts of the catchment area that are much further away.

31. In the particular circumstances of Beauchamp College and taking into account the opposition of the governing board of St Thomas More, its multi-academy trust and diocese, I consider that the fact that St Thomas More is located within the catchment area of the school does not of itself constitute a logical reason for including it as a feeder school. It is likely that no child will be admitted to the school in September 2022 solely because they live in the catchment area. In my view, the giving of priority to children who attend a school in the catchment area, irrespective of whether they live in it themselves, requires a stronger justification if it is to be regarded as a “reasonable ground” for the selection of a feeder school, within the meaning of paragraph 1.15 of the Code.

32. The school also says that the inclusion of St Thomas More as a feeder school is founded on the importance of “fair parental choice.” I infer from this phrase that the school regards the giving of priority to children at St Thomas More under the third oversubscription criterion as providing parents with an option to choose a secondary school for their children that they would not otherwise have, and that it would be unfair if those parents were the only ones with children attending a school in the catchment area who did not have that choice.

33. The law and regulations relating to admissions and the Code itself do not give parents an unfettered right to choose a school for their child. They are able to express a preference, which must be satisfied unless to do so would “cause prejudice to the provision of efficient education, or the efficient use of resources.” Such prejudice is generally asserted to arise for admissions over the school’s PAN in the normal year of entry. When a school is heavily oversubscribed, large numbers of children will not be allocated a place at the school that is the preference of their parents. There were 187 children in this position at Beauchamp College for admission in September 2021. The addition of St Thomas More to the school may well mean that some children from St Thomas More would be allocated places. This, of course, would mean that some children attending other feeder schools who live a little further away from Beauchamp College might not obtain places. Quite obviously, the adding of St Thomas More as a feeder school will not add to the number of parents whose preference for Beauchamp College is satisfied.

34. The school has not justified the inclusion of St Thomas More as a feeder school because the two schools have particular links, either historic or recently put in place.

Parents of two and five children at St Thomas More made Beauchamp College school their first preference for admission in September 2020 and 2021, respectively. None was allocated a place, principally because St Thomas More was not a feeder school. In 2020, 23 out of 34 children leaving St Thomas More were admitted to St Paul's Catholic Academy and 11 went to other schools; for admission in September 2021, 28 out of 35 children have been allocated places at St Paul's. Nevertheless, on the basis of the consultation responses and the letter signed by 45 parents that Beauchamp College received, I acknowledge the likelihood that there appears to be a substantial minority of parents at St Thomas More that would welcome a greater priority for a place at the school.

35. The school suggests that the inclusion of St Thomas More as a feeder school will put parents and children from that school "on an equal footing as others in the catchment area." I take this to refer to the four other schools listed as feeder schools under the third criterion, three of which are in Leicester City LA while the fourth, St Cuthbert's Church of England Primary in Great Glen, is also in the catchment area of another secondary school. I do not know whether these schools have any particular links with Beauchamp College other than being located within its catchment area. Crucially, though, they have been listed as feeder schools for a number of years without any objection being made. In the case of St Thomas More, the diocese as objector and St Thomas Aquinas Multi-Academy Trust have provided a specific reason, that is, the continuity of Catholic education that those bodies are committed to providing, for arguing that St Thomas More should not be a feeder school. The governing board of St Thomas More supports this position. I consider that this puts St Thomas More in a different position to the other feeder schools listed under the third oversubscription criterion and justifies its different treatment in this respect.

36. I note that some responses to the consultation suggested that it was unfair to parents at St Thomas More to be restricted to feed one secondary school and that "that there are increasing numbers of non-Catholic students at St Thomas More and families should be able to choose where they complete their secondary education." The letter signed by 45 parents apparently suggested that not to include St Thomas More as a feeder school represented "unfair discrimination". I do not share this view. Parents of children leaving St Thomas More are not restricted to entering only one secondary school, that is, St Paul's Catholic Academy. The 11 children from St Thomas More who did not transfer to St Paul's in September 2020 were admitted to seven different secondary schools, including Gartree and Manor High Schools and schools in Leicester City. I do not consider that not to include St Thomas More as a feeder school constitutes "unfair discrimination." Rather, it acknowledges that St Thomas More is a different type of school that has no particular relationship with Beauchamp College. I accept that the reorganisation of schools in Leicestershire may have complicated matters, but I am satisfied that parents, Catholic or non-Catholic, enrolling their children at St Thomas More understand that they are entering a Catholic system of education and should have no expectation that attending that school will give them a higher priority for a place at a particular school without a religious character, any more than attending a community primary school would give a higher priority for a Catholic secondary school.

37. St Thomas More is located in a catchment area that in all likelihood will not of itself play a part in determining who is allocated places at the school in September 2022. Indeed, its inclusion as a feeder school could increase the likelihood of children who do not live in the catchment area obtaining places at the expense of those who do, but may not have been able to secure a place at a named feeder school, as Leicester City LA pointed out in expressing its support for the objection. Leicestershire LA expressed “some reservations concerning this proposal in that it could mean City residents securing school places over County children at a county school.” I recognise the LA’s concern to ensure that it can fulfil its responsibility to provide sufficient school places for its residents, but would comment that this should not, as I am sure the LA would accept, preclude parents from outside the LA area having the opportunity to seek to obtain a place at the school.

38. I do not consider that fairness demands that parents of children at St Thomas More are provided with the advantage, in terms of admission priority, that adding it as a feeder school for Beauchamp College would bring. Put another way, I am not persuaded that parents of children at St Thomas More were unfairly disadvantaged when that school was not a feeder school for admission in September 2021. Therefore, the school would not be in breach of paragraph 1.8 of the Code if St Thomas More were not listed as a feeder school. For the avoidance of doubt, I am expressing no opinion on whether it is appropriate that other schools are listed as feeder schools under the third criterion “because they are in the catchment area.”

39. For the reasons given above, I do not consider that the school’s argument that it would be an unfair restriction of parental choice not to include St Thomas More as a feeder school is convincing. In my view, it does not represent a reasonable ground for its inclusion within the third oversubscription criterion. Taken together with my conclusion, in paragraph 31 above, that the location of St Thomas More within the school’s catchment area is also not a reasonable ground for its selection as a feeder school, I find that the arrangements for admission in September 2022 are in breach of paragraph 1.15 of the Code. I uphold the objection.

Summary of Findings

40. St Thomas More has no historic or ongoing links with Beauchamp College; rather, it considers itself part of a sequential pattern of Catholic education. Its governing board, multi-academy trust and diocese all wish it to be listed as a feeder school only by its partner Catholic secondary school. Beauchamp College explains the selection of St Thomas More as a feeder school for admission in September 2022 on the ground that it was the only primary school in its catchment area that was not listed as a feeder school in its arrangements. However, residence in the catchment area is given a lower priority than attendance at a feeder school and places are not likely to be allocated solely on the basis of residence. St Thomas More’s location within the catchment area does not of itself justify its inclusion as a feeder school. It is not an unfair restriction of parental choice for children at St Thomas More not to be given a higher priority for a place at this particular school; children transferring from St Thomas More have been allocated places at several other secondary schools. Beauchamp College has not provided reasonable grounds for the selection of St

Thomas More as a feeder school. This is a breach of paragraph 1.15 of the Code. I uphold the objection.

Determination

41. In accordance with section 88H(4) of the School Standards and Framework Act 1998, I uphold the objection to the admission arrangements for September 2022 determined by Lionheart Academies Trust for Beauchamp College, Leicestershire.

42. By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code requires the admission authority to revise its admission arrangements within two months of the date of the determination.

Dated: 25 June 2021

Signed:

Schools Adjudicator: Peter Goringe