



Office of
the Schools
Adjudicator

Determination

Case reference: REF4191(for 2023) and REF4216 (for 2024)

Referrer: A member of the public

Admission authority: Hounslow London Borough Council for Alexandra Primary School

Date of decision: 26 July 2023

Determination

I have considered the admission arrangements for September 2023 and 2024 for Alexandra Primary School, Hounslow and for the other primary schools for which Hounslow London Borough Council is the admission authority in accordance with section 88I(5) of the School Standards and Framework Act 1998. I find that in relation to the tie breaker used in the arrangements for 2023 for children living in the same block of flats, the arrangements do not conform with the requirements. I have also found that there are other matters which do not conform with the requirements relating to admission arrangements in the ways set out in this determination for the arrangements for 2023 and those for 2024.

By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code (the Code) requires the admission authority to revise its admission arrangements within two months of the date of the determination unless an alternative timescale is specified by the adjudicator. In this case, concerning the tie breaker only, I determine that the arrangements must be revised by 31 August 2023.

The referral

1. Under section 88H(2) of the School Standards and Framework Act 1998, (the Act), an objection has been referred to the Office of Schools Adjudicator (OSA) by a member of the public (the referrer), about the admission arrangements (the 2023 arrangements) for Alexandra Primary School (the school), for September 2023. The school is a community primary school, for which Hounslow London Borough Council (the local authority, the LA) is

the admission authority, and the arrangements are those for all community infant and primary schools in the local authority's area. The date of the objection was 15 May 2023. As a result, the admission arrangements for the school for September 2024 (the 2024 arrangements) have also come to the adjudicator's attention.

2. The referral relates to the tie breaker which is part of the arrangements. Specifically, the referrer complains that the priority given to children living in the same block of flats as other equally qualified children if their flat has a lower number makes the arrangements "flawed, inadequate and not suitable". He also says that the means used for the measurement of the distance from the school to a child's home is "subjective" and does not take account of safety issues.

Jurisdiction

5. The referrer submitted an objection to these determined arrangements on 15 May 2023 by submitting the OSA's form for objections to the admission arrangements of schools for September 2024 but confirmed in subsequent correspondence that his objection was in fact to the admission arrangements for September 2023. The School Admissions Code (the Code) requires objections to admission arrangements for 2023 to be made to the Office of the Schools Adjudicator by 15 May 2022. As this deadline was missed, the case cannot be treated as an objection. However, as the arrangements have been brought to my attention, I have decided to use the power conferred under section 88I(5) of the Act to consider whether the arrangements conform with the requirements relating to admission arrangements and I am treating the objection as a referral.

6. As a result of the date of the objection, the arrangements for 2024 have been brought to my attention, and I am also using the power given to me under section 88I(5) of the Act to consider them and whether they conform with the relevant requirements.

7. I am considering the arrangements for September 2023 under REF4191 and those for September 2024 under REF4216.

8. The parties to the cases are the governing board for the school, the local authority and the referrer, who accepted my invitation to remain a party following my decision to treat my consideration of the arrangements for both years as referrals.

Procedure

9. In considering this matter I have had regard to all relevant legislation and to the Code.

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

- a) the referrer's form of objection and accompanying documents dated 15 May 2023 and subsequent correspondence;

- b) copies of the minutes of the meeting of the local authority's Cabinet at which the arrangements for both years were determined;
- c) a copy of the determined arrangements; and
- d) comments from the local authority on the matters raised and supporting documents and subsequent correspondence.

The Referral

11. The first matter raised in the form of objection was that the tie breaker used in connection with the oversubscription criterion of distance from the school to a child's home, which states that "where blocks of flats are treated as one address, priority will normally be given to the lowest flat number", is "flawed, inadequate and not suitable". It is my understanding that the objection (which I am treating as a referral) is therefore that this part of the arrangements fails to comply with the requirement in paragraph 14 of the Code that "the practices and criteria used to decide the allocation of school places are fair".

12. The second matter raised was that the means for measuring such distances is "subjective" and that this fails to take into account the safety of alternative walking routes when distances are measured. Paragraph 14 of the Code requires practices and criteria used in admission arrangements to be "fair, clear and objective" and paragraph 1.8 that oversubscription criteria are "reasonable...objective and procedurally fair".

13. The objector also complained that the consultation process which was conducted before the arrangements were determined was flawed. However, I have no jurisdiction under section 88(5) of the Act to consider a complaint about the consultation process which took place.

Other Matters

14. When the arrangements were brought to my attention, I considered that the following additional matters concerning both the 2023 and the 2024 arrangements did not, or might not, conform with the requirements for admission arrangements:

15. Paragraph 2.17b) of the Code states (in relation to the admission of children to school below compulsory school age) that admission authorities **must** make it clear in their arrangements that "...the child's parents can defer the date their child is admitted...". The arrangements state that "Parents may.... request to defer their child's start...", which may mean that the requirement of this paragraph is not met.

16. Paragraph 2.17c) of the Code states admission authorities **must** make it clear in their arrangements that "...where the parents wish, children may attend part-time until later in the school year...". The arrangements say that "Parents will need to discuss this with the Headteacher so that the child's experiences, readiness for school and individual needs can be understood and the Headteacher can plan how they can fit part-time admission into the

organisation of the school”, which may mean that the requirements of this paragraph are not met.

17. Paragraph 2.18 of the Code states that “Admission authorities **must** make clear in their arrangements the process for requesting admission outside the normal age group”. The arrangements state that “Requests should accompany the application for the child’s normal year of entry and be supported by documentation from a professional for consideration” but give no information about the form in which such a request should be made, or which persons would be considered “a professional”, or what would be considered material relevant to the support of such an application. This may mean that the requirements of this paragraph are not met.

18. Appendix I of the admission authority’s document setting out its admission arrangements provides parents with further information concerning looked after and previously looked after children, exceptional medical/social need, the distance criterion and the home address of the child that the LA uses in connection with the application of its oversubscription criteria. This is entitled “Guidance for Admission Arrangements for Reception, Junior transfer and Year 7” and begins on page 35 of a document which is 52 pages in length. I was concerned that the relevant “admission arrangements” for early years admissions (for example) are in Appendix B, which ends on page 6 of the document. Many parents reading Appendix B would be unlikely to come across this further content when reading the arrangements in my view, which may make the arrangements unclear and contrary to the requirement of paragraph 14 that they be so and that “Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated.”

Background

19. When the local authority was provided with a copy of the form of objection and the supporting papers submitted by the objector it very helpfully informed me that it believed that the complaint was intended to be in respect of the admission arrangements for the school for 2023, since the parent had been refused a place at the school for September 2023 for their child and was at that time appealing against that decision.

20. I have no knowledge of the outcome of that appeal, and decisions concerning the application of admission arrangements are not a matter for the adjudicator.

21. In view of what the local authority had said, I wrote to the objector explaining the deadlines which apply to objections to admission arrangements and asking for confirmation as to which arrangements were the subject of his concern, that is, whether they were the arrangements for 2023, for 2024 or both. The objector replied that it was the 2023 arrangements that were the subject of his objection (and therefore not those for 2024), and he repeated his concerns about the priority given to those in the same block of flats and about what he perceived as a lack of consultation prior to the determination of arrangements containing this criterion.

22. The local authority also provided me with a copy of its determined admission arrangements for 2023 and 2024, and access to the minutes of the meetings of its Cabinet on 8 February 2022 and 21 February 2023 at which these were respectively determined.

A. The 2023 arrangements

23. The document seen and approved by the local authority Cabinet on 8 February 2022 consists of a series of 10 “Appendices” (to the officers’ report) (lettered A-J), setting out the proposed published admission numbers for community primary and secondary schools (Appendix A), the proposed admission arrangements for community infant and primary schools (Appendix B), those for junior schools (Appendix C), two pan London coordinated schemes, the arrangements for one particular school, in-year arrangements, and others. Appendix I has the title “Guidance for Admission Arrangements for Reception, Junior transfer and Year 7 for 2023-2024”. Appendix J is the local authority’s Fair Access Protocol.

24. I have confined my attention to the contents of Appendix B and Appendix I.

25. The arrangements in Appendix B say the following, so far as is relevant here:

“Primary School Oversubscription Criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the criteria set out below:

1. **A Looked after Child** [as defined] (See [Appendix I](#) for further information relating to looked after and previously looked after children)
2. **Exceptional Medical/Social need** [as defined] (See [Appendix I](#) for further information relating to exceptional medical/social need)
3. **Sibling** [as defined]
4. **Children of staff** [as defined]
5. **Distance** – Where there are more applications that meet this criterion than there are places in the school, priority will be given to those children who live nearest to the school, with the distance from home to school being measured using a computerised mapping system (See [Appendix I](#) for further information)

Tie Breaker

If there is one place available and two or more children next in order of prioritymeet the appropriate criterion equally, the place will be allocated using the distance criterion. If the distances are equal, a place will be allocated by drawing lots in the presence of an independent witness.”

Appendix I (which begins on page 35 of a document which is 52 pages long) says the following:

“Distance criterion

[Three paragraphs which describe the “geographical information system” used to measure home to school distances, described as “the walking route”]

The network [previously described] starts from the seed point [previously described] in the property provided as the child’s address and continues by the walking route to the nearest of the school gates which is used by pupils to enter the school grounds. Where blocks of flats are treated as one address, priority will normally be given to the lowest flat number. If the distances are equal, a place will be allocated by drawing lots in the presence of an independent witness. The walking route is established using an algorithm within the software used by the LA.”

26. Under the heading “Deferred Admission”, the arrangements state that:

“Parents may....request to defer their child’s start....”

27. Under the heading “Part-time admission”, the arrangements state that:

“....parents may choose to consider part time [sic] admission....Parents will need to discuss this with the Headteacher so that the child’s experiences, readiness for school and individual needs can be understood and the Headteacher can plan how they can fit part-time admission into the organisation of the school.”

28. Under the heading “Admission of children outside their normal age group”, the arrangements state that:

“Requests should accompany the application for the child’s normal year of entry and be supported by documentation from a professional for consideration.”

B. The 2024 arrangements

29. The format and the content of the arrangements concerning the above matters is identical to that described above for the 2023 arrangements, with the exception of the references to the tie breaker in Appendix B and Appendix I. The reference in Appendix B to the drawing of lots has been replaced with:

“If the distances are equal, the LA’s database will randomly order these. (See Appendix I for further information on distance measurement).”

In Appendix I, the treatment of blocks of flats constituting the same address has been replaced by the sentence:

“Where there are multiple applications with equal distances, the LA’s database will randomly order these.”

The wording of the 2023 arrangements is repeated in “The walking route is established using an algorithm within the software used by the LA.”

Consideration of Case

30. It is clear from the above that the matter concerning the treatment of addresses in blocks of flats in the 2023 arrangements about which the referrer made his (late) objection is no longer relevant concerning those for 2024, since these have been changed. I shall therefore consider below my view of this matter in respect of the 2023 arrangements and of the other matters set out above in respect of the arrangements for both years.

The tie breaker for those living in the same block of flats

31. When the LA responded to the objection concerning the treatment of blocks of flats in the 2023 arrangements, it said the following:

“We believe that our arrangements for parents that live in blocks of flats where the distance measurements are clear for parents, as it is clear that lower flat numbers would be given priority [sic]. This also gives parents a better understanding of their priority on the waiting list. 1.8 states that Admissions [sic] arrangements must include an effective, clear and fair tiebreaker [sic] to decide between two applications that cannot otherwise be separated by using the lower flat number to indicate the priority order. This was a clear indication to parents who lived in blocks of flats that there was an effective, clear and fair tiebreaker [sic] and how their applications would be separated and [sic] believe we comply with 1.8.”

32. There is no doubt in my mind that this is an effective and clear tie breaker, as the LA says. My concern, and that of the referrer, is whether it is also fair.

33. I have considered very carefully the concept of “fairness” as it applies to the circumstances in which the admission arrangements are being used. There is no definition of the term “fair”, either in the Code or in legislation. That is to say, the word itself must be considered as having its ordinary meaning rather than one set out elsewhere. The Supreme Court has described fairness as a “protean concept” [Lord Wilson in R (Moseley) v LB Haringey [2014] UKSC 56 at paragraph 24], meaning that it cannot be defined in universal terms but that, like Proteus the Greek god of the sea, it changes its shape continuously. It must be seen in context.

34. In this case that context is, first, as the referrer has pointed out, that the number which is assigned to a flat in a block of flats is not just a number. It also carries a value. While I have not conducted any systematic survey of practice concerning this matter, I am nevertheless content that it is very common that flats are numbered using the floor or level in the building where they are situated, as was the case for the referrer. As a result, I believe it is more common than not that flats on higher levels will have higher numbers than flats nearer the ground.

35. Second, the entrance to a block of flats, the point from which the distance to different schools is measured, will be the same point for all those living in the block. Those given priority through the application of the tie breaker are those with lower flat numbers, and they live on a lower floor in the block than those who are not given priority. Children living nearer the ground live nearer to the entrance to the block and so must have an (albeit slightly) shorter travel time to any given school than those living higher up in the same block. The tie breaker is only used when there are insufficient places for all the equally qualified children, and so some children with higher flat numbers, who live on higher floors, will not be given a place.

36. Third, those not given a place will need to go to a different school, which is not their preferred school. They will then have a slightly longer journey time to any given alternative school than other children living on a lower floor in the same block of flats would have had to the same school.

37. The preference given to lower flat numbers (and so the necessary refusal of a place to some with higher flat numbers, given there are not enough places) must mean that those given priority will be those with slightly shorter home to school journeys in general than those not so prioritised. That is to say, the disadvantage to those losing out on a school place using the tie breaker in the arrangements will always be greater than that which would have applied if, say, the tie breaker had prioritised higher flat numbers rather than lower ones. While such a tie breaker would also systematically discriminate between the candidates (since those with lower flat numbers would always lose out), it would do so more equitably, since it would avoid the double disadvantage (of losing out on a place at a preferred school and having a greater distance to travel to an alternative school) which is the result of the current tie breaker. It seems to me that the tie breaker as it appears in the 2023 arrangements is not equitable in nature, and not fair.

38. When it determined the arrangements for 2024, the LA modified the tie breaker in the way described above. In the 2024 arrangements priority is given to equally qualified children living in the same block of flats using a process of random allocation instead of flat numbers. The disadvantage suffered by those who do not achieve a school place is not systematic in nature, since it is random, and the same is true for any double disadvantage which is involved. I therefore asked the LA what the rationale had been behind this change, since it seemed to me that this was possibly relevant to my consideration of the 2023 arrangements.

39. The LA told me that it had adopted a new software system in 2021 to manage the admissions process. This new system was not able to prioritise lower flat numbers automatically, and the LA was obliged for two years to “manually manipulate the order of allocation to ensure that the lowest flat was given priority in accordance with the published criteria, which introduced a significant administrative burden on the process”. The new software did, however, have the capacity to carry out a random process automatically and so this was adopted as the means to be used for 2024 in order to avoid the need for a manual intervention.

40. I have a number of observations to make on what the LA has said. First, it shows that the use of the tie breaker concerning blocks of flats has been extensive in nature, since otherwise the administrative burden referred to by the LA would not have been significant. Second, it makes it clear that random allocation was an alternative to the tie breaker used in the 2023 arrangements which was available to the LA then and which could have been employed by it. Third, the reason for changing to a random process had been administrative in nature, and not because the LA considered the change necessary for other reasons (such as its fairness).

41. Because the tie breaker used in the 2023 arrangements in relation to addresses in the same block of flats results in a systematic double disadvantage for those who are not prioritised by it, and because alternatives were available to the LA which either avoided a systematic double disadvantage or which made its occurrence random in nature, I am of the view that the priority given to lower flat numbers in the 2023 arrangements is unfair, and so fails to comply with the requirements of paragraphs 14 of the Code.

42. I note here in passing that although the LA consulted on the proposed arrangements for 2024 before it determined them, the consultation documentation had said that “There are no changes to the admission criteria”. When I raised this with the LA, it said that the change in “the process of the distance criteria” did not in its view “constitute a change in the admission criteria”.

43. Although I have no jurisdiction concerning this consultation as I am considering the 2024 arrangements under section 88(5) of the Act, I think it is worth me pointing out for the benefit of readers that the Code in a footnote to paragraph 5 defines admission arrangements as “...the overall procedure, practices, criteria and supplementary information to be used in deciding on the allocation of school places and refers to any device or means used to determine whether a school place is to be offered.”

44. There is no doubt in my mind that the change which was introduced into the arrangements for 2024 did constitute a change to the admission arrangements from those used in 2023 and so should have been signalled as such to consultees. The LA has, helpfully, already acknowledged this.

45. I also note in passing that the consultation which took place prior to the determination of the arrangements for 2023, and about which the referrer had complained, also said that there had been no changes to the arrangements from those for the previous year. However, it is my understanding from what I have been told by the LA that the tie breaker discussed above had been in use for some years prior to 2023, and its continued use would not have needed to be the subject of consultation unless there had been no consultation on the arrangements as a whole in the previous seven years, as provided for in paragraph 1.45 of the Code. The LA has informed me that it consults annually on its proposed admission arrangements whether or not any changes to them are being considered.

The means used to measure distances

46. I turn now to the second element of the referral, which is the means used by the LA to measure home to school distances, which the referrer has said is “subjective”. The complaint which was made is that the distance measure which is used by the LA is not the most appropriate for considering the admission of children, especially very young children, to schools. Actual travel time and the safety of walking routes are not components of what is assessed if what the referrer terms “geodesic” distance, which to all intents and purposes is the same as a straight-line measurement between two points, is the criterion used.

47. The distance measurement system used by the LA is provided in Appendix I to the determined admission arrangements for both 2023 and 2024. These are identically worded (with the exception of references to different software suppliers in the two years) and describe a “geographical information system” which identifies the point used for the home address which is linked to a digitally established road network (using Ordnance Survey data) and continues via a walking route (which is digitally established) to the school gates in question.

48. When it responded to the referral, the LA said that this process did not “consider every alternative walking route”, and that while individuals may themselves choose from a variety of routes to travel from their home to a school according to their own assessment of its suitability (which might include safety factors), the LA could not in practice accommodate such decisions on the part of parents, which would themselves be subjective. It considered that it was appropriate for it to have a standard means for measuring distance which it describes in sufficient detail for parents to “..make a judgement on whether their application may be successful when considered on distance”.

49. Paragraph 1.13 of the Code says:

“Admission authorities **must** clearly set out how distance from home to the school used in the arrangements will be measured. This **must** include making clear how the ‘home’ address will be determined and the point(s) in the school....from which all distances will be measured.”

50. The Code makes no reference to the safety of potential walking routes (or to travel times as opposed to distances) as the referrer would wish to be the case. Such matters are relevant when it comes to the duty of local authorities to provide free home to school transport as required under section 444(5) of The Education Act 1996, which entails the establishment of a “nearest available route”. Recent guidance issued by the DfE ([Travel to school for children of compulsory school age. Statutory Guidance for local authorities. June 2023](#)) also sets out circumstances in which children may be entitled to such free transport if there are no suitable routes which can be walked in safety, but this is not a mandated consideration when home to school distances are used to determine which children shall be admitted to oversubscribed schools.

51. The arrangements for both years do not fail to comply with what the Code requires concerning the measurement of home to school distances.

Other matters

52. The LA has accepted that the wording of the arrangements that says that parents are able to make a request to defer the admission for a child in Year R until it reaches compulsory school age does not reflect the entitlement which is given to parents to do so in paragraph 2.17b) of the Code, although it says that it advises parents of this right. Nevertheless, the Code is clear in saying that:

“admission authorities **must**make it clear in their arrangements that where they have offered a child a place at a school.....

b) the child’s parents can defer the date their child is admitted to the school until later in the school year but not beyond the point at which they reach compulsory school age and not beyond the beginning of the final term of the school year for which it was made”.

53. The LA has helpfully agreed to amend its arrangements accordingly, but as determined the arrangements for both 2023 and 2024 fail to comply with paragraph 2.17b) of the Code.

54. Similarly it is my view that the wording of paragraph 2.17c) of the Code is very clear when it says:

“admission authorities**must**make it clear in their arrangements that where they have offered a child a place at a school.....

c) where the parents wish, children may attend part-time until later in the school year but not beyond the point at which they reach compulsory school age.”

55. The LA has in this case said that it intends to “review” the wording contained in its arrangements (which I have set out above). It has told me that it encourages parents to have a dialogue with the school where their child has been offered a place “as different schools may have different approaches to accommodating part-time attendance. We want parents to understand that not all schools will make the same offer regarding part-time hours”. It says that its brochure for parents says that “parents may choose to consider part-time admission” and suggests that the same wording could be used in its admission arrangements “so that the information is consistent and there can be no misunderstanding.”

56. While the Code does not specify levels of part-time attendance, which may indeed need to be slightly different in different schools for practicality reasons, it does specify that admission arrangements must be clear that part-time attendance itself is a right given to parents in the relevant circumstances, at all schools. The arrangements as determined do not do this and neither does the current wording of the LA’s brochure, which should be consistent with admission arrangements which meet the Code’s requirements. The arrangements for both 2023 and 2024 fail to comply with paragraph 2.17c) of the Code.

57. When it responded to my concern about what the arrangements say about requests for the admission of children outside their normal age group, the LA replied:

“The Code does not stipulate a particular process that LAs should follow and there is no requirement for a form to be made available. However, we accept that it would assist parents if there was more information regarding how to make a request. We will include that a separate written request should be submitted to the School Admissions team with all future information.”

This is a helpful statement as it would tell parents the form in which to make their request, but only if it is made part of the admission arrangements, and not as part of “information” which does not have this status. As to the process for making this request, the Code does indeed not specify a process, but it does require that the process the admission authority wishes to see followed must be made clear in the arrangements. What is present in the arrangements for both 2023 and 2024 falls short of specifying a process to be followed in the ways I have suggested above. The LA has told me that it does give examples of professional persons, but this is only in that part of Appendix I which is concerned with medical/social need, not with requests for admissions outside a child’s normal age group. As determined, the arrangements for both years fail to comply with the requirement set out in paragraph 2.18 of the Code.

58. I was particularly concerned about the need for parents to read definitions located in a distant appendix (Appendix I) in connection with the distance tie breaker. A reading of Appendix B in the 2023 arrangements in isolation would lead most readers to believe that children living at the same distance from a school (which on the face of it includes children whose home is in the same block of flats) would be separated by the drawing of lots, which was not the case for this particular group in 2023. The same issue applies to all the other definitions included in Appendix I. The LA has again helpfully accepted that this is a concern. However, as determined the arrangements for both years fail to comply with the requirements of paragraph 14 that arrangements be clear and that parents can easily understand from them how school places are allocated.

Summary of Findings

59. I have set out the reasons why I have come to the view that the admission arrangements for 2023 contain a tie breaker for otherwise equally qualified children who live in the same block of flats which is unfair, in contravention of paragraph 14 of the Code.

60. The 2023 arrangements are still relevant to admissions until at least the end of December 2023 and I hope that it will be possible for the LA to ensure that any residual unfair effect of the tie breaker which it uses in connection with children living in the same block of flats for admissions in September 2023 is now mitigated to the extent that that is possible for those already affected. Any further effect should be removed entirely by an amendment to its arrangements which happens as quickly as possible. The Code requires the admission authority to revise its admission arrangements within two months of the date of the determination unless an alternative timescale is specified by the adjudicator. In this

case, concerning the tie breaker only, I determine that the arrangements must be revised by 31 August 2023.

61. I have also explained why the arrangements for both 2023 and 2024:

- (i) do not use a method for measuring home to school distances in connection with the application of the oversubscription criteria which is subjective in nature, or which is otherwise inappropriate, as alleged by the referrer;
- (ii) do fail to comply with the requirements of paragraphs 2.17 b), 2.17c) and 2.18, and
- (iii) do fail to satisfy paragraph 14 of the Code concerning the ease with which parents can understand them.

Determination

62. I have considered the admission arrangements for September 2023 and 2024 for Alexandra Primary School, Hounslow and for the other primary schools for which Hounslow London Borough Council is the admission authority in accordance with section 88I(5) of the School Standards and Framework Act 1998. I find that in relation to the tie breaker used in the arrangements for 2023 for children living in the same block of flats, the arrangements do not conform with the requirements. I have also found that there are other matters which do not conform with the requirements relating to admission arrangements in the ways set out in this determination for the arrangements for 2023 and those for 2024.

63. By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code (the Code) requires the admission authority to revise its admission arrangements within two months of the date of the determination unless an alternative timescale is specified by the adjudicator. In this case, concerning the tie breaker only, I determine that the arrangements must be revised by 31 August 2023.

Dated: 26 July 2023

Signed:

Schools Adjudicator: Dr Bryan Slater