

# **Determination**

Case reference: REF 4390

Referrer: Central Bedfordshire Council

Admission authority: Life Academies Trust for Biggleswade Academy

Date of decision: 13 November 2024

#### **Determination**

I have considered the admission arrangements for September 2025 for Biggleswade Academy in accordance with section 88I(5) of the School Standards and Framework Act 1998 and find that the school's catchment area does not fully conform with the requirements of the School Admissions Code. 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.

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 unless an alternative timescale is specified by the adjudicator. In this case I determine that the arrangements must be revised by 6 December 2024.

#### The referral

- 1. Under section 88H(2) of the School Standards and Framework Act 1998, (the Act), an objection was referred to the Office of the Schools Adjudicator by Central Bedfordshire Council (the referrer; local authority; CBC), about the admission arrangements (the arrangements) for Biggleswade Academy (the school), for September 2025.
- 2. The referral relates to concerns about changes to the catchment area of the school. Specifically, the referrer is concerned that:
  - the school's expanded catchment area is not clear;
  - the changes are unfair to other schools;

- the admission authority did not publish its admission arrangements on the school's website.
- 3. The parties to the case are the school, Life Academies Trust (the trust) and the referrer.

## **Jurisdiction**

- 4. The terms of the Academy agreement between the 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 foundation and voluntary aided schools. These arrangements were determined under section 88C of the Act by the trust which is the admission authority for the school in February 2024 on that basis.
- 5. The referrer submitted an objection to these determined arrangements on 9 September 2024. The School Admissions Code (the Code) requires objections to admission arrangements for September 2025 to be made to the Office of the Schools Adjudicator by 15 May 2024. As this deadline was missed, and 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 stated in earlier correspondence with all of the parties, I have concluded that, under section 88I of the Act, I do not have the jurisdiction to consider whether the admissions authority completed a consultation in line with paragraphs 1.45-1.48 of the Code. I have explained the reasons for this lack of jurisdiction to the parties.

## **Procedure**

- 7. In considering this matter I have had regard to all relevant legislation and the School Admissions Code (the Code).
- 8. The documents I have considered in reaching my decision include:
  - a) the referrer's form of objection dated 9 September 2024 and subsequent correspondence;
  - b) copies of the minutes of meetings of the trust at which the arrangements were discussed and determined;
  - c) a copy of the determined arrangements;
  - d) comments from the admission authority on the matters raised, supporting documents and subsequent correspondence;

- e) information available on the websites of the local authority, the school and the Department for Education (DfE); and
- f) maps showing an outline of the school's catchment area.

### The Referral

9. CBC, as the referrer, raises concerns about changes to the catchment area of the school. The objection states:

"It is still not clear what the business case was for a change to catchment particularly, when it was made clear that the transition from 3 to 2 tier in the area did not require changes to catchments and that any such change should be undertaken in conjunction with schools in the area. All schools in the area were given this same messaging."

#### Additionally, CBC states:

"Information about what area the expanded catchment covers has not been fully provided by the Academy. All that has been provided is the map which is attached [to the objection form]. No detail as to what the area represents. It does however cover all of Biggleswade."

This may be in breach of paragraph 1.14 of the Code which, in part, states:

"Catchment areas **must** be designed so that they are reasonable and clearly defined."

10. CBC raises concerns that changes to the catchment area

"absorb the catchment areas of all primary age schools in Biggleswade with no discussion or regard for the other schools. Whilst the academy has stated they consulted, feedback from local schools is contrary."

CBC believes that the change will impact on newly formed schools within the area. It says that this has led to tensions between the school and other local schools which it has tried, unsuccessfully so far, to resolve. CBC also states that the school asserts CBC is in support of the change but "essentially there isn't support for this change." CBC believes that the school, as admission authority, may have been in breach of paragraph 14 of the Code when drawing up the catchment area. Paragraph 14 states:

"In drawing up their admission arrangements, admission authorities **must** ensure that the practices and the criteria used to decide the allocation of school places are fair, clear, and objective. Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated."

11. At the time of completing the objection form, CBC state that neither the 2024/25 nor the 2025/26 admission arrangements were published on the school's website. It is argued that this is in breach of paragraph 3.7 of the Code which states:

"Admission authorities **must** notify the appropriate bodies of all variations and **must** display a copy of the full varied admission arrangements on the school's website or their website (in the case of a local authority) until they are replaced by different admission arrangements."

#### **Other Matters**

- 12. When the arrangements were brought to my attention, I considered that the following additional matters might not conform with the requirements for admission arrangements. I therefore raised these matters with the school.
- 13. The arrangements state: "The Academy waiting list will be maintained for a minimum of one full school term." This statement appears not to meet the requirements of paragraph 2.15 of the Code which requires a waiting list to be maintained until at least 31 December.
- 14. The arrangements appear to suggest that late applications are added to a waiting list, and are, therefore, potentially in breach of the admissions timeline set out on page 41 of the Code.
- 15. The arrangements do not make clear that parents of children below compulsory school age may defer their child's entry to school. Therefore, they appear not to meet all the requirements of paragraph 2.17 of the Code.
- 16. While the arrangements provide some information in relation to admission outside of a child's normal age group, they lack clarity in relation to summer born children. This appears to be in breach of paragraph 2.18 of the Code.
- 17. The arrangements appear not to meet the tie-breaker requirements of paragraph 1.8 of the Code.
- 18. The arrangements lack clarity in relation to any in-year admission of children and, therefore, appear to be in breach of paragraph 2.26 of the Code.

# **Background**

19. In October 2022, CBC published a statutory notice of proposed changes to the Biggleswade cluster of schools to take effect in September 2024. In summary, the notice stated:

"Central Bedfordshire Council ... intends to make a significant change (prescribed alteration) to schools within the Biggleswade area from September 2024.

The proposals ... are part of a wide reorganisation including maintained schools and planned changes to academies ... This also includes related proposed changes to some admissions arrangements as a consequence of the reorganisation of schools in Biggleswade that are also included within this document. The intention is to ensure any admission arrangements in Biggleswade are consulted on and can inform the determination of the annual admissions consultation."

- 20. The document goes on to set out the changes proposed. In essence, this reflects a change from three tiers of education (lower; middle and upper schools) to two tiers (primary and secondary schools). The proposed changes applied to all the schools within the Biggleswade cluster, including six maintained schools and five academies.
- 21. From figures provided by CBC, I have calculated that the overall effect of the proposed changes would be to reduce the number of places available for primary aged children by 135 and increase the number of places available for secondary aged children by 110, 'growing to' 320. Although not explicitly stated, I take this to mean that additional secondary provision is to be built. I note that in CBC's 'School for the Future Consultation' document in summer 2021, over 3000 new homes are to be built in Central Bedfordshire by 2035. Some of these homes will be in and around Biggleswade.
- 22. The change proposed for the school as part of the consultation is shown in table 1.

Table 1: Proposed Change to Biggleswade Academy (for implementation September 2024)

School	Current Size	Current Age Range	Proposed Size	Proposed Age Range
Biggleswade	Lower PAN 90	Reception to	Primary PAN	Reception to
Academy Lower	Middle PAN	Year 8 (age 4 to	120 (840 pupils)	Year 6 (age 4 to
and Middle	140	13)		11)
	(450 + 560 pupils. Total 1010 pupils)			

- 23. In September 2024, Biggleswade Academy opened as a primary school for pupils aged two to eleven years. According to the DfE's website 'Get Information about Schools', the school currently has 1168 pupils on roll.
- 24. The school became an academy in August 2012. It is the only member of the Life Academies Trust.
- 25. At its most recent inspection in May 2024, the school was judged as 'Good' by Ofsted. The report notes:

"The school is going through an unsettling period, as it prepares to change its age range and become a primary school in September 2024. Senior leaders and trustees are determined to minimise the impact of these changes ..."

#### **Consideration of Case**

26. The referrer's concerns centre on changes made by the trust to the school's catchment area. CBC state:

"Changes to admissions arrangements were discussed and considered as part of the 3 tier to 2 tier changes and were set out in the statutory notice. The LA were clear that there was no requirement to change catchment areas for future primary schools, due to them all covering an area of the cluster with no overlapping areas. However, [there was a] proposal to remove catchments for the Y7 intake to ensure that the middle and upper school catchment areas could align as they were overlapping due to having Y5 & Y9 points of entry in the 3 tier system. This statutory notice clearly shows the process to consider admissions and catchments as part of the coordinated change, which the original Business Case from Biggleswade Academy matched. The change to catchment in Biggleswade Academy was proposed and agreed outside of this process and did not allow full consideration or any time in the process to amend consult and consider linked arrangements at the neighbouring schools."

27. The school has provided evidence that it did undertake a consultation to revise its catchment area for September 2024. This took place between 28 June and 8 August 2023. On 28 June 2023, the school wrote to all parents, stakeholders and colleagues:

"In line with the submission of the Business Case to the Regional Schools Director regarding the change in age range and published admission numbers (PAN) for Biggleswade Academy, I write further to consult on a revised catchment area for the school.

With the change from a three form entry school to a four form entry school, predicted from September 2024, Central Bedfordshire Council has recognised the request for Biggleswade Academy to revise its current catchment area to cater for additional pupils wishing to apply to the school. A map outlining the current and planned revised catchment areas is attached... Biggleswade Academy invites views from all Stakeholders ... between Wednesday 28th June and Tuesday 8th August, as part of this consultation process."

- 28. The other ten schools within the Biggleswade cluster and four members of CBC staff were sent a copy of the "catchment change consultation letter" referenced in the previous paragraph.
- 29. In summary, the original catchment area included the south-east part of Biggleswade and surrounding countryside The proposal extended the catchment area to include the

whole of the town of Biggleswade and some rural areas to the north, east and west of the town. In effect, the proposal approximately doubled the size of the catchment area. The trust board minutes of May 2023 describe this as "changing catchment area to include all current Lower Schools in Biggleswade plus across to Sutton Lane; as this is a natural border."

30. The school provided the following timeline of events in relation to the change of catchment area:

"6th October 2022, Trust Board meeting

[CBC staff], recognised that Biggleswade Academy had the right to revise our catchment area in light of the Local Authority's request to increase the schools PAN from 90 to 120. CBC confirmed it was Biggleswade Academy's choice on our catchment area and CBC would update the catchment area for any area the Trust Board decides is our catchment.

2nd February 2023, Trust Board meeting

Admission Policy with Primary assumption approved (Admissions Policy 2024/2025). The assumption was on the basis that the Local Authority had not given final sign off for the Schools for the Future programme, with an effective date for the Biggleswade Cluster being September 2024, for the change from three to two tier.

7th March 2023, Trust Board meeting

The new catchment was discussed and Trustees agreed to revise the catchment area.

25th May 2023, Trust Board meeting

The revised proposal for the catchment area for Biggleswade Academy was agreed to, after conversations regarding advantages and disadvantages, and the process of the change [including the need to consult] was discussed and approved.

12th October 2023, Trust Board meeting

The results for the Catchment Consultation were reviewed and the decision to change catchment in line with the results (there were 26 responses, with 50% in favour of the change and 23% responding as 'don't know') and the requirement for Biggleswade Academy to receive further pupils in line with the Local Authority's request to increase the PAN from 90 to 120."

- 31. Of the 26 responses received, 22 were from parents of current pupils. CBC did not respond during this consultation period.
- 32. The school also provided copies of minutes from the Biggleswade Community of School Headteacher meetings of 9 June 2023 and 22 September 2023. At the June

meeting information was shared about the planned consultation while in September the outcomes were shared.

- 33. This timeline of events is corroborated by the supporting documentation. The minutes of October 2022 trust board meeting, with CBC staff present, state "catchment areas have not been considered by CBC.... BA [the school] choice on what is our catchment.".
- 34. There is evidence, therefore, that the admissions authority did consult on changes to its catchment area, albeit outside of the timeline set out in the Code and about which I will comment later, and that other schools in the local area were made aware of the consultation. The LA have not challenged the accuracy of this information.
- 35. The trust has confirmed that the school's admission arrangements for 2024/25 were provisionally determined in February 2023, pending confirmation of the change from being a lower / middle school to a primary school. In October 2023, the trust determined the final admission arrangements for 2024/25 for the new primary school, including the amendments to the school's catchment area. The trust has also confirmed that, at the same meeting:

"the admission arrangements for 2025/2026 were also discussed and agreed for the school to then review the policy if any changes were required. The 2025/2026 Admissions Policy was reviewed, no changes were required and it was presented to the Trust Board for the February 2024 meeting; the policy was approved during this meeting."

- 36. According to the Biggleswade cluster's PAN for 2024/2025, there were 405 places available for children eligible to join a Reception (YR) class. From data provided by CBC, there were 344 children on roll in YR in September 2024. Four of the nine primary schools had vacancies in their YR classes, including the school. The school admitted 94 children to YR compared with a PAN of 120.
- 37. Given the school was asked by CBC to increase its PAN from 90 to 120, it does not seem unreasonable that the trust should enable children from a wider area to join the school. Additionally, while there is a house building programme planned for the locality, none of the building work was included within the school's original catchment area. As a consequence, in May 2023, the trust decided "to allow for the new build areas to be included within the revised catchment". I find that the changes to the catchment area of the school are reasonable taking into account the relevant circumstances.
- 38. While the trust is free to set a catchment area which is reasonable, paragraph 1.14 of the Code states that it must also set a catchment area which is clearly defined. The trust's admissions policy does not clearly define the catchment area. The link in the policy to CBC's website does not work and I have been unable to locate a map or any further details about the catchment area on the school's website. If a parent goes directly to CBC's website, they are able to check which school catchment area they live in from their address or postcode. However, this does not meet the requirements of the Code.

39. Paragraph 18 of the Office of the Schools Adjudicator Annual Report 1 January 2023 to 31 December 2023, in part, states:

"We have seen admission arrangements which refer to "interactive catchment maps". These are typically located on local authority websites and allow parents and others to establish which school catchment area or areas a particular address falls into. They are very useful tools and I am sure of great use to parents who are considering which schools to express a preference for. However, they are not on their own enough to satisfy the requirement in paragraph 1.14 of the Code that catchment areas be "clearly defined." Being able to establish that an address is within the catchment area of a school does not define that catchment area of that school any more than does establishing that an address is within West Sussex define the county boundaries of West Sussex. Where a catchment area is part of a school's admission arrangements, that catchment area must be defined clearly – by means of a map which shows its boundaries clearly or by some other means such as a definitive list of road names or post codes."

- 40. So, while I find that the catchment area for the school is reasonable, it is not clearly defined and is, therefore, in breach of that part of paragraph 1.14 of the Code.
- 41. The referrer is also concerned about the impact of the changes to the catchment area on other schools in the cluster. CBC believes that this has led to tensions between schools and is unfair to the other schools.
- 42. In its response, the trust state that they are not aware of any tensions between the school and other schools. The trust also refers to a meeting with CBC staff in May 2024:

"In which we explained the Trust's reason for wanting to revise our catchment area, and the area this would be. In this meeting the Local Authority implied that they were considering all of Biggleswade not having catchment areas in the near future."

- 43. The admission authority determines its own admission arrangements which must be compliant with the Code. It is for admission authorities to decide which criteria would be most suitable to the school according to the local circumstances. An admission authority can choose to include catchment areas within its arrangements although there is no requirement to do so.
- 44. CBC has argued that in setting the catchment area, the trust has acted in breach of the requirement of fairness set out in paragraph 14 of the Code. Because the catchment area is an oversubscription criterion, the more relevant paragraphs of the Code are 1.14, which I have addressed, and paragraph 1.8 which states, in part:

"Oversubscription criteria **must** be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation. 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..."

- 45. CBC has not argued that the catchment area is procedurally unfair. Neither has it alleged that the catchment area disadvantages unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs. The argument is that the new catchment area is unfair to other schools. The Code does not contain any specific requirement that admission arrangements must be fair to other schools. There may be circumstances where it might be unreasonable to set a catchment area which disadvantages other schools. However, in this case, the local authority has not produced any evidence of a substantive adverse effect upon other schools such as details of how many applicants other local schools might 'lose'; or why this might be unreasonable (given that the enlargement of the school's catchment area might be considered to enhance parental preference). There is no explanation of what CBC considers will be the likely effect. I, therefore, find that there is no breach of the requirements of paragraph 1.8 of the Code.
- 46. CBC argues that the trust is in breach of the requirement in paragraph 3.7 of the Code to display a copy of the full varied admission arrangements on the school's website. However, as this paragraph applies to variations and the trust has confirmed that the school's arrangements for 2025/26 have not been varied, it does not apply. The relevant paragraph of the Code is 1.50 which states that:
  - "1.50 Once admission authorities have determined their admission arrangements, they **must** notify the appropriate bodies and **must** publish a copy of the determined arrangements on the school's website or their own website (in the case of a local authority) by **15 March** in the determination year and continue displaying them for the whole offer year (the school year in which offers for places are made). Admission authorities **must** also send a copy of their full, determined arrangements to the local authority as soon as possible before 15 March in the determination year".

Both the 2024/2025 and 2025/2026 admission policies are published on the school's website and are easily accessible under the heading 'key information' and 'policies'. They were both on the website when I initially looked at this case in late September 2024. I cannot tell when these were first published but the trust currently meets its obligations to display a copy of the full, determined arrangements on the school's website as required by paragraph 1.50 of the Code.

47. As noted earlier in the determination, I do not have the jurisdiction to consider whether the admissions authority completed a consultation in line with paragraphs 1.45-1.48 of the Code. However, I note that a consultation about the admission arrangements for 2024/2025 did take place between 28 June and 10 August 2023. These dates do not meet the requirements of the Code which state in paragraph 1.46 that a consultation **must** take place between 1 October and 31 January in the determination year, which in this case would have been between October 2022 and January 2023. The consultation was delayed due to the timing of decisions relating to the statutory changes that were taking place at around this time. I will make no further comment on this except to say that if the trust is

intending to change its catchment area further for 2026/2027, as suggested by CBC in its initial objection form, it must follow the process and timescale set out in the Code.

- 48. I will now consider the other matters referred to above which I thought might not conform with the requirements for admission arrangements. My conclusions on these matters, having considered the school's responses, are set out below.
- 49. The arrangements state: "The Academy waiting list will be maintained for a minimum of one full school term." This does not meet the requirements of paragraph 2.15 of the Code which states:

"Each admission authority **must** maintain a clear, fair, and objective waiting list until at least **31 December** of each school year of admission."

I am grateful to the trust for agreeing to include the specific date in future versions of the policy.

50. The arrangements appear to suggest that late applications are added to a waiting list. The arrangements state:

"In the event of more applications to the Academy than places available, the application will be placed on a waiting list. These and late applications will go onto this list in a position determined by the criteria ..."

The wording is not clear because it implies that no late applicants will be offered a place in the initial offers round. While they may be given lower priority than all on-time applicants, if there are places available these should be offered. The school cannot leave places vacant and place late applicants on the waiting list in order of the oversubscription criteria.

This is in breach of the admissions timeline set out on page 41 of the Schools Admissions Code which states:

"For late applications (those which are submitted before the first day of the first term but are too late for an offer to be made on National Offer Day), parents also apply to and receive an offer from the local authority".

- 51. The arrangements do not make clear that parents of children below compulsory school age may defer their child's entry to school. They do not, therefore, meet all the requirements of paragraph 2.17 of the Code which states:
  - "Admission authorities must provide for the admission of all children in the September following their fourth birthday. The authority must make it clear in their arrangements that where they have offered a child a place at a school:
  - a) that child is entitled to a full-time place in the September following their fourth birthday;
  - 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; and

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."

I am grateful to the trust for agreeing to review the information already in the policy to ensure that it gives greater clarity to this aspect of its admissions arrangements.

52. While the arrangements provide some information in relation to admission outside of a child's normal age group, they lack clarity in relation to summer born children. This is in breach of paragraph 2.18 of the Code which states:

"Parents may seek a place for their child outside of their normal age group, for example, if the child is gifted and talented or has experienced problems such as ill health. In addition, the parents of a summer born child may choose not to send that child to school until the September following their fifth birthday and may request that they are admitted out of their normal age group – to reception rather than year 1. Admission authorities must make clear in their admission arrangements the process for requesting admission out of the normal age group."

Again, the trust has agreed to review the information already in its admission arrangements to ensure that it gives greater clarity about the admission of summer born children.

53. The arrangements state that the distance from a child's home to the school is used as a tie-breaker to allocate places to pupils where there are "more children with an equal right to admission to the school than the number of available places." This is not a tie-break situation as defined by paragraph 1.8 of the Code which, in part, states:

"Admission arrangements **must** include an effective, clear, and fair tie-breaker to decide between two applications that cannot otherwise be separated."

Distance is an acceptable approach to separating applications within an oversubscription criterion, as set out in paragraph 1.13 of the Code. However, the arrangements need to explain how a place would be allocated in the case of two applications that cannot otherwise be separated, for example, if two children live equidistant from the school. One possible approach is included in Appendix 2 of the Code. The current arrangements do not meet the requirements of paragraph 1.8 of the Code.

54. In relation to the in-year admission of children, the arrangements lack clarity, for example, it is not clear how parents can apply for a school place. The arrangements are in breach of paragraph 2.26 of the Code which, in part, states:

"They **must** set out how parents can apply for a school place, and, where they manage their own in-year admissions, provide a suitable application form for parents to complete (and a supplementary information form where necessary), and set out when parents will be notified of the outcome of their application and details about the right to appeal. If the admission authority is to be a part of the local authority's in-year

co-ordination scheme, it **must** provide information on where parents can find details of the relevant scheme. An admission authority, governing body or local authority **must** provide a hard copy of the information about in-year applications on request for those who do not have access to the internet."

I am grateful to the trust for agreeing to review its admission arrangements to ensure it gives greater clarity regarding in-year admissions.

55. 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 unless an alternative timescale is specified by the adjudicator. The closing date for applications for primary school places is 15 January 2025. Giving the usual two-month time limit would mean that the arrangements would not need to be revised until the middle of January 2025. This would mean that a number of parents seeking places for their children in September 2025 would be making applications on the basis of admission arrangements which are unclear and not compliant with the requirements of the Code I have identified. The necessary revisions must be made in good time to enable parents applying for places to be able to look at a set of admission arrangements which comply with the requirements of the Code and which they are able to understand easily. Consequently, I determine that the arrangements must be revised by 6 December 2024.

# **Summary of Findings**

- 56. In summary, I find that while the school's catchment area is reasonable, it is not clearly defined and is, therefore, in breach of the clarity requirement in paragraph 1.14 of the Code. I find that the arrangements do not conform with the requirements in this aspect.
- 57. I find that the arrangements are not unfair in relation to the setting of a catchment area. They do not breach the fairness requirements in paragraph 1.8 of the Code.
- 58. The 2024/2025 and 2025/2026 admission policies are published on the school's website as required by paragraph 1.50 of the Code. I find that the arrangements conform with the requirements in these aspects.
- 59. There are some other aspects of the trust's arrangements that need to be revised. These are explained in detail above.

#### **Determination**

60. I have considered the admission arrangements for September 2025 for Biggleswade Academy in accordance with section 88I(5) of the School Standards and Framework Act 1998 and find that the school's catchment area does not fully conform with the requirements of the School Admissions Code. 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.

61. 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 unless an alternative timescale is specified by the adjudicator. In this case I determine that the arrangements must be revised by 6 December 2024.

Dated: 13 November 2024

Signed:

Schools Adjudicator: Catherine Crooks