



Office of
the Schools
Adjudicator

Determination

Case references: ADA4651 and ADA4652

Objectors: Members of the public

Admission authority: Ridgeway Learning Partnership for Tring School, Hertfordshire

Date of advice: 24 September 2026

Determination

In accordance with section 88H(4) of the School Standards and Framework Act 1998, I do not uphold the objections to the admission arrangements determined by Ridgeway Learning Partnership for Tring School, for 2027/28.

I have also considered the arrangements under section 88I(5) and find that they do not comply with 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 this determination.

The referral

1. Under section 88H(2) of the School Standards and Framework Act 1998 (the Act), two objections have been referred to the adjudicator about the admission arrangements for 2027/28 for Tring School (the 2027 arrangements). Tring School (the School) is an academy for students aged between 11 and 18 years.
2. In order to differentiate between the two objections I will refer to the first objection received (1 May 2026) as from objector 1 and the second objection received (13 May 2026) as from objector 2.
3. The parties to the objections are:

- a. objector 1;
- b. objector 2;
- c. Ridgeway Learning Partnership which is a multi-academy trust and the admission authority for the School (the Trust);
- d. the local governing body for the School, which determined the arrangements on behalf of the Trust (the governing body);
- e. Hertfordshire County Council which is the local authority for the area in which the School is situated (the local authority or HCC); and
- f. the Diocese of St Albans which is the religious authority for the School as it is designated as having a Church of England religious character (the faith body).

4. My summary of the objections is:

- a. The consultation did not meet the requirements of the Code.
- b. The catchment area does not fully represent the local community.
- c. The change to the admission arrangements that gives a lower priority to siblings of children at the School is not fair or reasonable. This includes that no transitional arrangements were put in place.
- d. The change to the arrangements disadvantages children with special educational needs and disabilities (SEND) contrary to paragraph 1.8 of the Code and the Equality Act. This includes that no transitional arrangements were put in place.

Jurisdiction

5. The terms of the academy agreement between the Trust and the Secretary of State for Education require that the admissions policy and admission arrangements for the School are in accordance with admissions law as it applies to foundation and voluntary aided schools.

6. These arrangements were determined by the governing body under section 88C of the Act on 11 February 2026. The Trust said that it delegated authority to the governing body to determine the arrangements on the Trust's behalf; the Trust remains the admission authority.

7. Objector 1 made their objection on 1 May 2026 and objector 2 made their objection on 13 May 2026. The objectors asked to have their identity kept from the other parties and have

met the requirement of Regulation 24 of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 by providing details of their name and address to me.

8. I am satisfied the objections have been properly referred to me in accordance with section 88H of the Act and the matters summarised above are within my jurisdiction. Further matters were raised which I have not considered as they were not in my jurisdiction.

9. I have also used my power under section 88I of the Act to consider the arrangements as a whole and to determine whether or not they conform with the requirements relating to admissions and, if not, in what ways they do not so conform. I will refer to these as 'other matters' and they are covered in the section of the determination under the title of that name.

Procedure

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

11. The information I have considered in reaching my decision includes:

- a) the objections and supporting documents;
- b) a copy of the minutes of the meeting of governing body at which the arrangements were determined;
- c) the determined 2027 arrangements including the supplementary information form (SIF);
- d) responses from the Trust, the local authority, the faith body and the objectors to my requests for further information;
- e) information on the most recent consultation on the arrangements;
- f) a copy of the guidance on admissions provided by the faith body to the Trust;
- g) maps showing the location of the School, its catchment area and other relevant schools;
- h) the House of Commons Library briefing on 'Government consultations' published February 2025 (the government briefing);
- i) information available on the website for the School; and
- j) information available on government websites including:
 - a. 'Get Information About Schools' (GIAS);

- b. Ofsted;
- c. 'Financial Benchmarking and Insights Tool' (FBIT);
- d. 'The Equality Act and Schools' (2014) advice made by the Department for Education (the DfE), which I will refer to as the DfE advice; and
- e. 'Find and compare schools and colleges in England' (the DfE website).

Background

12. The School's published admission number (PAN) for admission to year 7 is 240. GIAS records the School as having capacity for 1507 students with 1599 on roll. The School was judged by Ofsted to be 'good' at its last inspection in 2023. The 2027 arrangements set out that children with education, health and care plans (EHC plans) will be admitted first. Then, when oversubscribed, children will be prioritised in the order of the oversubscription criteria. These can be summarised as follows:

- 1) Looked after and previously looked after children
- 2) Children of staff employed at the School
- 3) Children with a social or medical reason for attending the School
- 4) Children who live in the catchment area for the School
- 5) Siblings of children who will be attending the School in year 7 to 11
- 6) Up to ten children who have worshipped at a Christian church at least once a month for 12 months. If fewer than ten children meet this criterion, the remainder of the places are for children for whom one parent has worshipped at a Christian church for at least once a month for 12 months.
- 7) Distance from the School with those living closest with the higher priority.

13. The objections came following changes to the arrangements from those determined for 2026. My jurisdiction is for the 2027 arrangements but as there are references to the previous arrangements (the 2026 arrangements), I provide the oversubscription criteria for the 2026 arrangements in summary below. These apply after those with an EHC plan that names the School have been admitted.

- 1) Looked after and previously looked after children
- 2) Children of staff employed at the School
- 3) Siblings of children who will be attending the School in year 7 to 13

- 4) Children with a social or medical need to attend the School
- 5) Children who live in the catchment area
- 6) Up to ten children who have worshipped at a Christian church at least once a month for 12 months. If fewer than ten children meet this criterion, the remainder of the places are for children for whom one parent has worshipped at a Christian church for at least once a month for 12 months.
- 7) Distance from the School with those living closest with the higher priority.

14. The changes from 2026 to 2027 were to:

- a. the year groups of those who will be considered as siblings (it was for years 7 to 13 and in the 2027 arrangements it applies to years 7 to 11); and
- b. the priority order, which has changed as set out above.

15. There are various terms used for 'catchment area' including 'parishes', 'in county' and 'priority area'. I will use the term catchment area as used in the Code where those living in a defined geographical area have priority in the oversubscription criteria over some of those living outside of that area. The local authority described the catchment area as below:

"Tring school has prioritised pupils living in the current "catchment" area for many years. Its catchment area includes four rural parishes and Tring itself. Three of the four rural parishes are directly adjacent to Tring town. For the fifth, Little Gaddesden, Tring School is the nearest secondary school for many within the parish."

Consideration of Case

16. I will consider the aspects of the objection in the order set out above.

The consultation did not meet the requirements of the Code.

17. When considering the matter raised by the objectors in respect of the consultation process, I only have jurisdiction to consider whether the School followed the statutory process when making changes to the arrangements. If I were to find that the consultation process did not follow the statutory process in any way, it would not automatically follow that the changes made would not be concordant with the Code. It is also not in the adjudicator's gift to direct an admission authority run a consultation process again if it has been found that it did not conform to the Code.

18. As a school designated as having a religious character and which uses faith based oversubscription criteria, paragraph 1.38 of the Code is relevant:

“Admission authorities for schools designated as having a religious character **must** have regard to any guidance from the body or person representing the religion or religious denomination when constructing faith- based admission arrangements, to the extent that the guidance complies with the mandatory provisions and guidelines of this Code. They **must** also consult with the body or person representing the religion or religious denomination when deciding how membership or practice of the faith is to be demonstrated. Church of England schools **must**, as required by the Diocesan Boards of Education Measure 1991³², consult with their diocese about proposed admission arrangements before any public consultation.”

19. Paragraphs 1.45 to 1.47 of the Code are concerned with consultation and say:

Paragraph 1.45: “When changes are proposed to admission arrangements, all admission authorities **must** consult on their admission arrangements (including any supplementary information form) that will apply for admission applications the following school year. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities **must** consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period.”

Paragraph 1.46: “Consultation **must** last for a minimum of 6 weeks and **must** take place between 1 October and 31 January in the determination year.”

Paragraph 1.47: “Admission authorities **must** consult with:

- a) parents of children between the ages of two and eighteen;
- b) other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions;
- c) all other admission authorities within the relevant area (except that primary schools need not consult secondary schools);
- d) whichever of the governing body and the local authority is not the admission authority;
- e) any adjoining neighbouring local authorities where the admission authority is the local authority; and
- f) in the case of schools designated with a religious character, the body or person representing the religion or religious denomination.”

The glossary to the Code also explains:

“Relevant Area

The area for a school (determined by its local authority and then reviewed every two years) within which the admission authority for that school must consult all other prescribed schools on its admission arrangements.”

20. The local authority circulated a link to the consultation on behalf of the Trust to all schools and their admission authorities in the local authority’s area, and to relevant faith bodies and neighbouring local authorities. Responses to the proposed changes were to be made to the School. The local authority also told the governing body that it must consult with parents and advised it used a variety of communication methods and suggested a possible form of words.

21. The Trust told me:

“A letter was sent to all parents with children currently attending Tring School. The letter was also sent to all the local schools in both Hertfordshire and Buckinghamshire with a request to have it sent to their parents. A poster was also sent to local primary schools for display, as well as Tring Library who displayed it. Information regarding the consultation was posted on the school website and social media.”

22. The local authority said that the consultation ran between 27 October and 7 December 2025, which is the minimum six weeks required by the Code. This is not consistent with the minutes of the meeting of the governing body on 11 February 2026; this recorded the consultation as having taken place between 14 November and 31 December 2025. I will assume that the consultation did take at least six weeks and this has not been challenged.

23. The faith body explained that it was consulted as follows:

“The school sought our advice at several points during the process of setting the 2027-28 arrangements, both by telephone and via email, and our point of contact was the school’s Admissions Coordinator. We were formally notified of the intended consultation on 21st October 2025 and were sent a draft admission policy with the sibling priority removed completely; we replied on 24th October 2025 with a list of suggested revisions. We were sent revised draft arrangements on 10th November 2025; these included a limited degree of sibling priority and took account of some, but not all, of our previous comments. We sent back our comments on these revised drafts on 10th November 2025 and told the school that, if it was too late to take account of these in the consultation paperwork, the governors should consider these comments as our formal response to the consultation.”

24. From the evidence provided to me, it appears that the people and bodies that the Code requires to be consulted, were consulted.

25. Objector 1 said:

“The minutes of the Governors meeting at which the revised admissions criteria were approved (appendix A), provide no evidence of any meaningful debate, discussion, or scrutiny of the proposed changes. There is no recorded discussion of the issues raised during the statutory consultation, and little indication that the governing body considered the objections submitted by parents.

Under the School Admissions Code governing bodies are required to “consult meaningfully” and to “consider the responses received” before determining their arrangements. The absence of any reference in the minutes to the particular objections raised or the rationale for disregarding particular concerns suggests that this statutory duty was not fulfilled. The Code makes clear that decision making must be transparent and must show how consultation responses have been taken into account. The minutes, as recorded, do not meet this standard.

Furthermore, the minutes appear to give insufficient consideration to contributions from local parents living outside the catchment area. The minutes also note that some parents used a template to submit their views, but this is presented in a way that appears to diminish the legitimacy of those responses. The Admissions Code does not permit governing bodies to discount consultation feedback on the basis of format or similarity, all responses must be considered fairly and without bias. Taken alongside the lack of documented debate and the absence of any recorded evaluation of consultation feedback this raises serious questions about whether the governing body properly discharged its responsibilities under the Admissions Code.”

26. This aspect of the objection is therefore about the decision making following the consultation, rather than the consultation exercise itself. I asked objector 1 for the sources of the statements regarding what was in the Code. Objector 1 explained that the source was the ‘Gunning Principles’ and not the Code. These are explained in the government briefing as:

“The Gunning principles

Even where a consultation has been held, public bodies can be challenged through judicial review if they have not followed the proper consultation process. On issues where there is no defined process for consultation set out in legislation, public bodies have some discretion in how they consult. However, they must abide by the common law principles for fair consultation, also known as the ‘Gunning principles’. The Gunning principles, which were established by the 1985 case *R v London Borough of Brent, ex p Gunning*, state that:

- consultation must take place when a proposal is at a formative stage and can still be changed

- consultees must be made aware of the criteria that will be used in decision-making and be told the reasons behind any proposals to allow them to give an informed response
- consultees must be given adequate time to respond
- the outcome of any consultation must be taken into account in the decision-making process”.

27. The Trust provided me with the information provided to the governing body for the meeting at which the governing body determined the arrangements on 11 February 2026. This information was in a paper for which the title was ‘Admissions Proposal 2027’ (the consultation paper). The paper provided the oversubscription criteria for 2026/27, the proposed oversubscription criteria for 2027/28, and summarised the changes. A rationale for the changes was provided which said:

“These changes were proposed to ensure students from our immediate catchment area obtained a place at Tring School. As a school, we are concerned that places are being filled by out-of-county students who are obtaining a place through the sibling rule, in particular through a sibling in the Sixth Form, where more out-of-catchment places are obtained. The proposed changes are designed to allow more pupils from in-catchment addresses and feeder schools to obtain a place at Tring School”.

28. There is then a summary of admissions data for 2021 to 2025 and the possible allocations for 2026. The summary included the numbers and proportions of admissions under each oversubscription criterion, and data provided by the local authority on the number of children living in the catchment area for each year unable to be admitted to the School and those admitted as siblings of those living outside the catchment area. There was also a summary of the responses received to the consultation by main themes, such as not wanting the sibling priority reduced to those in years 7 to 11. This was followed by a recommendation to the governing body which said:

“Whilst we understand these changes will always be controversial, the majority of those responses against the proposal were from OOC (out of catchment) parents. Where these changes are particularly disadvantageous is for our existing parental body with children already in the school. We did consider a transitional arrangement to mitigate this impact, however, adding a temporary arrangement for existing parents was not legal for a 1 year policy. We are therefore recommending the proposal in its original format (with minor changes made in terms of feedback on the wording from HCC and the Diocese (the faith body)).

29. The minutes of the governing body’s meeting broadly covered these areas. I note that the minutes said:

“Governors debated that the majority of those responses against the proposal were from OOC parents. Where these changes are particularly disadvantageous is for our existing parental body with children already in the school. A transitional arrangement to mitigate this impact, adding a temporary arrangement for existing parents, was not legally allowed, as advised by the Diocese and HCC”.

30. Both the faith body and the local authority have said that they did not advise that it was not possible to have transitional arrangements. The local authority said:

“I have not provided any advice on this issue to the school and nor, to my knowledge, has any of my colleagues. If I had it would have been the reverse. I am aware of some schools in Hertfordshire, and have worked closely with a number of academies, where transitional arrangements have been implemented when moving from one set of admission arrangements to another.”

31. There is no requirement to implement any protection for those affected by changes to admission arrangements and there appears to have been a misunderstanding on this matter. Objector 2 said:

“The School Admissions Code does not contain a general ban on transitional arrangements and adjudicator decisions show they are commonly used when changing sibling/catchment rules, so it is unclear whether the Board properly understood and exercised its discretion.”

32. It is true that the Code does not prohibit transitional arrangements and it is unfortunate that the Trust and the governing body misunderstood the discretion available to it. I will return to this matter below. However, I see no evidence that the Trust has not followed the requirements of the Code regarding consultation. I do not uphold this aspect of the objections.

The catchment area does not fully represent the local community

33. Objector 1 said:

“the catchment boundary used to define “local” is based on the diocesan boundary, which follows the Hertfordshire local authority line. This boundary does not reflect the actual geography of the area or the lived experience of families. Some of the children living in villages just outside this arbitrary line live closer to the school than in-catchment households, attend feeder schools for Tring School, and will face a longer and more complex journey to an alternative secondary school compared to some in-catchment peers if they are denied a place at their nearest school.”

34. In terms of the Code a feeder school is one named in the admission arrangements where, if a child attends the named school, the child will have a priority in the oversubscription criteria. There are no 'feeder schools' in the oversubscription criteria and so I understand the reference made by objector 1 (and by the Trust above) to be to those schools where a high proportion of children go on to attend the School.

35. 'Local' can mean different things to different people. It is not unusual to interpret 'local' as nearest but what is nearest may not be convenient or fair to others. For example, in a rural area, there may be natural transport routes which make travelling to a place eight miles away relatively easy while it would be difficult to travel to another place that is five miles away. In addition, what works in terms of children and schools will vary depending on the family's situation.

36. Hypothetically one family (family A) may live near to several schools, say within a five mile radius but another family (family B) may live within eight miles from the school which is closest to family A and 15 miles to any other school. In this situation it would not necessarily be unreasonable or unfair to give a greater priority to a child from family B to its nearest school than family A.

37. The School is to the far west of the local authority's area and the catchment area map shows a peninsula shaped area for which the elongation is bordered with the area of Buckinghamshire County Council (Buckinghamshire) and less than half bordered by the local authority's area. A small part is in Buckinghamshire. The DfE website, that measures distances in straight lines, shows no secondary schools within three miles of the School, and two within five miles, one (Ashlyns School or Ashlyns) in the local authority's area and one (John Colet School or Colet) in Buckinghamshire.

38. There are, according to the DfE website, 35 schools which admit children to year 7 between five and ten miles of the School with the majority being in the areas of other local authorities. I would therefore describe the School as being relatively geographically isolated and its catchment area as long and thin, following the local authority boundary, and largely bordered by Buckinghamshire. In addition, alternative secondary schools are mainly in other local authority areas and over five miles away. Most of the catchment area boundary is aligned with the local authority boundary.

39. The local authority said in response to my enquiries:

"Whilst there are some areas outside Hertfordshire that are also close to Tring school, to the east and west of Tring and Tring Rural, these areas are included within the catchment areas of Buckinghamshire schools, whilst Hertfordshire parishes are not. For example, Pitstone is in the catchment area for The Cottesloe School, Tring Rural is not."

40. In other words, if those living in Little Gaddesden, which is in the catchment area for the School, were not able to gain admission to the School, there would be no priority based on location for another secondary school. For the child living in Pitstone, which is in Buckinghamshire, there is priority for a school as Pitstone is in the catchment area of another school. However, for the child living in Pitstone, the School is the nearest secondary school as it is around two miles from Pitstone and alternative secondary schools are over five miles away (in a straight line as provided by the DfE website). I note here that not all children live in villages or towns but I have used named villages or towns as a practical indicator of distances from homes to schools.

41. I also looked at secondary schools situated to the south of the catchment area. There are no secondary schools within three miles of the village of Little Gaddesden, which is in the catchment area for the School, and there are five secondary schools, including the School, within five miles. It would therefore appear that the situation for those living in Pitstone is similar to those living in Little Gaddesden.

42. Catchment areas are often used as part of oversubscription criteria, particularly in rural areas. A patchwork of catchment areas can be created so that every child has a priority for a school. If one school changes its catchment area or removes the catchment area as an oversubscription criterion, this can remove the effectiveness of the overall patchwork leaving a child or children without a high priority for any school. It appears that in the area of the School and its neighbouring schools, including those in other local authority areas, the patchwork of catchment areas remains. This means that every child has a priority for at least one school. It may not always be their nearest school but, as I have described above, prioritising those who live closest to a school may significantly disadvantage a child who lives further from any school.

43. 'Local' is a subjective term which will mean different things to different people and vary depending upon the context. The catchment area does not include all those who live closest to the School, that does not make it unreasonable or unfair. There are good reasons for the way it is and I do not uphold this aspect of the objections.

The change to the admission arrangements that gives a lower priority to siblings of children at the School is not fair or reasonable. This includes that no transitional arrangements were put in place.

44. In this section I will focus on the reasonableness and fairness of the priority given to siblings. In the last section below, I will consider this aspect with particular consideration of those with special educational needs.

45. A change was made from the 2026 arrangements to the 2027 arrangements. In the 2026 arrangements the third oversubscription criterion was:

“Sibling: Children who have a sibling at the School at the time of application, unless the sibling is in the last year of the normal age range of the school. Note: the ‘normal age range’ is the designated range for which the School provides Years 7 to 13 at Tring School. A sibling means: the sister, brother, half-brother or sister, adopted brother or sister, or child of the parent/carer or partner and in any case must live in the same house from Monday to Friday.”

This third criterion was after looked after and previously looked after children, and children of staff. It was therefore likely that any child who had a sibling at the School would be admitted.

46. For the 2027 arrangements, the criterion regarding siblings is the fifth criterion:

“Sibling: Children who have a sibling at Tring School at the time of application in years 7 to 11. A sibling means: the sister, brother, half-brother or sister, adopted brother or sister, or child of the parent/carer or partner or a child looked after or previously looked after, and in every case living in the same house from Monday to Friday.”

47. The change is to the order of priority, now after looked after children and previously looked after children, children of staff, children with a social or medical need to attend the school and those who live in the catchment area for the School. Therefore, a child who lived in the catchment area for the School would have priority over a child with a sibling at the School who lived outside of the catchment area.

48. In addition, the age range of siblings considered was changed to exclude those attending the School in post 16 education.

49. Objector 2 provided considerable data with the objection and explained that the data came from that available on the local authority’s website and freedom of information requests. Table 1 is objector 2’s summary. I have not checked the calculations against the sources and none of the parties have raised any concerns. The data show offers, not admissions.

Table 1: offer of admission to the School by siblings living in the catchment area and outside the catchment area

Year	Siblings living in the catchment area	Siblings living outside of the catchment area	Total siblings	Percentage of siblings living in catchment area
2018	70	34	104	67.3%
2019	62	25	87	71.3%
2020	89	37	126	70.6%

Year	Siblings living in the catchment area	Siblings living outside of the catchment area	Total siblings	Percentage of siblings living in catchment area
2021	73	16	89	82.0%
2022	78	19	97	80.4%
2023	56	17	73	76.7%
2024	57	29	86	66.3%
2025	61	29	90	67.8%
2026	76	24	100	76.0%

50. Objector 2 said that the data show that there is no clear upward trend in the proportion of siblings who live outside the catchment area being allocated places. They also noted that for offers for admission in 2026:

“The last sibling offered a place lived 13,859.43 metres from the school, while the last non-sibling offered a place under the Local Parishes criterion lived 7,803.58 metres away. That illustrates that some siblings live significantly further away than some parish applicants, but it does not alter the overall pattern that most sibling places still went to priority-area families.”

51. Objector 2 also provided a summary of offers for admission to the School under each criterion for the years of admission 2016 to 2025. They said that the key points from this data were:

“In every year, a clear majority of places allocated under the sibling criterion were to children living in the priority area.

Out-of-catchment sibling numbers fluctuate, but do not show a sustained upward trend. They peaked at 37 in 2020 and were 24 in 2026, lower than 34 in 2018.

In 2026, 76% of sibling places went to children in the priority area, consistent with the pattern over the previous eight years.”

52. The local authority informed me that:

“had the new arrangements been in place for the last 3 years, allocations would only have been affected in 2025, when 5 more children from the named catchment area would have been allocated as opposed to 5 “out catchment” siblings”.

53. The Trust, in its proposal to the governing body following the consultation, said:

“As a school, we are concerned that places are being filled by out-of-county students who are obtaining a place through the sibling rule, in particular through a sibling in the Sixth Form, where more out-of-catchment places are obtained. The proposed changes are designed to allow more pupils from in-catchment addresses and feeder schools to obtain a place at Tring School”.

54. The information in table 2 below was provided as evidence to this view and is actual admissions to the School as opposed to offers. The data was broken down to show the number and proportion of those living outside the catchment area under each criterion and compared the proportion of those admitted who lived outside of the catchment area with the local authority averages. For the School, the proportion admitted living outside of the catchment area increased from ten per cent in 2021 to 19 per cent in 2025. The local authority average for children admitted to secondary schools who lived outside of the catchment areas fluctuated between 15 per cent and 29 per cent. I note that there is an increase in the proportion of children admitted who live outside of the catchment area in the years 2021 and 2025 and that the proportions are not significantly high when compared to the local authority average figures. There was particular reference to siblings of children with EHC plans who live outside of the catchment area. I will consider this further in the next section below.

Table 2: admissions based on criteria for admissions to year 7 in 2023 to 2025 when the oversubscription criteria were the same as in 2026

	2023	2024	2025
Children with EHC plans who live in the catchment area	3	2	7
Children with EHC plans who live outside the catchment area	0	7	8
Looked after and previously looked after children who live in the catchment area	N/A	N/A	1
Looked after and previously looked after children who live outside the catchment area	1	1	1
Children of staff who live outside the catchment area	2	1	2

55. The consultation paper also highlighted the number of children who live in the catchment area who were unlikely to be offered a place at the School for 2026. This will have been based on provisional figures as the consultation paper was provided for the meeting of the governing body on 11 February 2026. At that time, 25 siblings of existing students where the siblings lived outside of the catchment area were expected to be allocated places and 18 children who lived in the catchment area were expected to be refused places. In addition, seven children who met the faith based criterion were not expected to be allocated places.

56. The consultation paper also shows the very low number of children who lived within the catchment area in previous years who had not been admitted, until in 2025 this rises to five. The number of children admitted who were siblings of students already at the school and who also lived outside the catchment area was 15 in 2021 and 25 in 2025.

57. There were also children on the waiting list for the School for year 7 (four children) and year 8 (five children) who were living in the catchment area. I note here that children living in the catchment area who are on a waiting list will have applied after offers have been made and, if the School is full, the oversubscription criteria will not be directly relevant as the School is full.

58. In summary therefore, the Trust anticipated that 18 children who live in the catchment area would not be admitted in September 2026 while 25 children who lived outside the catchment area but had a sibling at the School would be admitted. This was the information considered when the Trust made its decisions.

59. I asked the local authority to provide the number of children admitted under each criterion for 2026/27. The oversubscription criteria for 2026/27 are different to those determined for 2027/28 but can give an indication of effect in 2027/28. The local authority provided the information as it knew it in July 2026 and I anticipate that there would have been no significant changes before September 2026.

Table 3: information on admissions to the School for year 7 in September 2026

Criterion	Number of allocations
Education, health and care plan	16
Looked after or previously looked after children	7
Children of staff	4
Children with sibling at the School	99
Children living in catchment area	106
Children meeting the faith based criterion	5
Other children	3
Total	240

60. One child who lived in the catchment area was on the waiting list; this was a late application after offers had been made. Therefore, for admissions in 2026, every child who lived in the catchment area who made an application by the closing date, was offered a place and every child who had a sibling at the School was offered a place. The concerns expressed by the Trust that children who lived in the catchment area would not be admitted due to the high priority for siblings did not materialise for admissions in September 2026. I do note, however, that there were only eight children admitted who did not meet a higher criterion than living in the catchment area (the five children meeting the faith based criterion and the three

‘other children’). It would not need many more siblings to be admitted who do not live in the catchment area before children living in the catchment area would not be admitted.

61. I also note that of those children living in the catchment area who were admitted, all but two lived in the immediate area of the School (the two children live in Little Gaddesden).

62. Ninety nine children expected to be admitted in September 2026 because they had a sibling at the School. Of these, 24 did not live in the catchment area, and so 75 did. Approximately, therefore, a quarter live outside of the catchment area and three quarters live inside. Objector 2 noted that the proportion of out of catchment area siblings admitted has not significantly increased. This is not necessarily the issue if the Trust’s intention is to avoid refusing places to those who live in the catchment area.

63. One of the changes made by the Trust for the 2027 arrangements was to remove the priority for siblings of those in post 16 education. The consultation paper said;

“As a school, we are concerned that places are being filled by out-of-county students who are obtaining a place through the sibling rule, in particular through a sibling in the Sixth Form, where more out-of-catchment places are obtained.”

64. I asked the Trust to provide the number of children who gained admission to the School as a result of a sibling who joined the School for post 16 education in 2024, 2025 and anticipated for 2026. The Trust does not know and explained that in 2024, 59 external candidates were admitted to the School for post 16 education. In 2025, 96 external candidates were admitted to the School for post 16 education with nine of these living in the catchment area for the School. From the way that the Trust provided this information, I assume that the 59 candidates admitted to the School in 2024 to post 16 education were all living outside the catchment area. The local authority provided the number of admissions based on children admitted due to a sibling in post 16 education; for those living outside the catchment area, there was one in 2025 and none in 2026.

65. Any child living outside the catchment area who already had a school place, could continue at the School for post 16 education (providing the child met the academic requirements) and such a child could have younger siblings seeking a place in year 7, although that would be an uncommon age gap.

66. The normal reasons to give priority to siblings at all, and the Code does not require such an oversubscription criterion, is that it is easier for families if their children attend one school in terms of transport and organisation. It can also be beneficial for the school community to have ongoing links with the families which attend. This is probably less significant when one child is in post 16 education and the other joining year 7. The change to the age range for sibling priority does not seem unreasonable, although the evidence base used by the Trust is insubstantial.

67. The more recent admissions data does not show an increasing number of children who lived in the catchment area who were not able to be admitted to the School because of children who lived outside the catchment area gaining admission because they had a sibling at the School. However, it would only need a slight difference for this to occur. The Trust has referred to recent house building in this regard potentially increasing the number of children living in its catchment area, for example. It is reasonable for the Trust to amend its admission arrangements to favour those who live within its catchment area.

68. I have considered the fairness of the 2027 arrangements and have taken into account that for some children, the School is their nearest secondary school and that it could be regarded as their local school for that reason. I am also aware that where there is an established pattern of catchment areas for secondary schools, as appears to be the case in this area, the nearest school is not always the catchment area school. There is the risk, that by favouring those who live close to the School above those who live in the catchment area, that those who live in the catchment area could be disadvantaged. I do not find that the arrangements are unfair in this regard. I will consider in the next section if there is unfairness for those with special educational needs.

69. An aspect of the objection was that no transitional arrangements were put in place. Transitional arrangements in this case would be to protect children seeking a place at the School who may be less likely to be admitted due to the change in the arrangements. There is no requirement for transitional arrangements to be put in place. In this case, to put transitional arrangements in place could undermine the purpose of the changes made. In other words, if the arrangements had had transitional arrangements so that those with siblings at the School would continue to get priority over those who lived in the catchment area, it is possible that those living in the catchment area would not be admitted. Admission arrangements are determined annually and no parent can assume that oversubscription criteria will stay the same.

The change to the arrangements disadvantages children with special educational needs and disabilities (SEND) contrary to paragraph 1.8 of the Code and the Equality Act. This includes that no transitional arrangements were put in place.

70. Objector 1 said:

“Some children are required to attend a particular school because it is the nearest setting able to meet their educational or medical needs – for example those with an EHCP or allocated a place on medical grounds. Under the agreed changes, the siblings of children in this position (who are already attending Tring school in years 7-13) will no longer be able to attend the same school as their brother or sister.

The governing board's own minutes acknowledge that the change is "particularly disadvantageous for families of children already attending the school". This disadvantage is significantly amplified for families already managing the additional challenges associated with SEND. For these families having siblings placed in different schools creates increased logistical, emotional and financial pressures, and risks undermining the stability and continuity that are especially important for children with additional needs... Separating siblings – particularly where one child has SEND - risks undermining the stability, routine and continuity that are often essential for wellbeing."

71. Objector 1 suggested that there may be indirect discrimination. Objector 2 said:

"The change has a foreseeable, disproportionate impact on existing families and on siblings of pupils with special educational needs and disabilities, yet there is no published equality or SEND impact assessment and no mitigation (such as limited or transitional protections for siblings of current pupils or of children with EHCPs)".

72. Paragraph 1.8 of the Code says, as far as relevant here:

"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".

73. The Equality Act 2010 (EA) defines 'protected characteristics' and unlawful discrimination for the purposes of the EA. The relevant protected characteristic in this instance would be disability. The DfE advice says:

"The law on disability discrimination is different from the rest of the Act in a number of ways. In particular, it works in only one direction – that is to say, it protects disabled people but not people who are not disabled. This means that schools are allowed to treat disabled pupils more favourably than non-disabled pupils, and in some cases are required to do so, by making reasonable adjustments to put them on a more level footing with pupils without disabilities. The definition of what constitutes discrimination is more complex. Provision for disabled pupils is closely connected with the regime for children with special educational needs."

74. The DfE advice clarifies that direct discrimination: "would be if a school discriminates against a person purely because of his or her disability (even if they are trying to achieve a legitimate aim) then it would be unlawful discrimination as there can be no justification for their actions." There is not direct discrimination in this case.

75. An example of indirect discrimination in the DfE advice is described as follows:

“A school must not do something which applies to all pupils but which is more likely to have an adverse effect on disabled pupils only – for example having a rule that all pupils must demonstrate physical fitness levels before being admitted to the school – unless they can show that it is done for a legitimate reason, and is a proportionate way of achieving that legitimate aim.”

76. I asked the Trust to explain how it had substantiated the part in its arrangements that says: “Policies have been written and reviewed with due regard to the Equalities Act 2010 (sic).” The Trust responded: “The Admission Policy has been written on the advice of HCC and with a review by HCC.” I can only assume that this means that the Trust has not considered the arrangements in light of the EA.

77. The objectors have raised the EA in terms of children with special educational needs being discriminated against because siblings may not be able to attend the same school. I do not think that the EA is relevant.

78. However, paragraph 1.8 of the Code prohibits an admission authority from disadvantaging unfairly, either directly or indirectly, a child with a disability or special educational needs. The local authority said that:

“The county council is unsure how the changes would impact any differently upon children with or without SEND. Children with an EHCP that names the school will not be affected. The siblings of children with an EHCP at Tring school may be less likely to obtain a place (if they live outside the catchment area), but that will not disadvantage a child with SEND more than a child without SEND. If a child has a specific medical or social reason to attend the school, and that could include SEND, an application can be made under Rule 3 regardless of the child’s home location.”

79. I asked the Trust the situation with regard to siblings of children with EHC plans and the Trust said:

“The parents of a child with an EHC plan makes a choice to name Tring School. Regarding siblings of children with Education, Health and Care Plans, parents choose to name Tring School, and younger siblings would naturally be at different primary schools anyway.”

80. I understand by this that the Trust means that parents do not have to choose the School to be named in their child’s EHC plan. It would have been an expectation, however, that younger siblings would have been able to join their older sibling with an EHC plan who attended the School in due course. This is now much less likely.

81. I have commented above that families find it easier if their children attend the same School. The challenges of a child with an EHC plan will vary and it will make a significant difference in some instances if siblings attend different secondary schools, which tend to be at greater distances from the home than primary schools. However, if there are particular reasons why the sibling of a child with an EHC plan, or indeed, any other special educational needs, attend the same school, then the third criterion may apply. The third criterion is:

“Children for whom it can be demonstrated that they have a particular medical or social need to go to the school: Children for whom it can be demonstrated that they have a particular medical or social need to go to the school. A panel of HCC officers will determine whether the evidence provided is sufficiently compelling to meet the requirements for this rule. The evidence must relate specifically to the school applied for under Rule 3 and must clearly demonstrate why it is the only school that can meet the child’s needs.”

82. The Trust has not shown much consideration of any of the effect of its arrangements on children with special educational needs including EHC plans. However, due to the third criterion there is scope to take this into consideration when applying the oversubscription criteria. This also removes the requirement for any transitional arrangements. I do not uphold this aspect of the objections.

Other matters

83. Having considered the arrangements as a whole it appeared to me that there are other matters which do not conform with requirements of the Code and so I brought them to the attention of the Trust. These matters are:

Clarity of arrangements

84. The arrangements are not clear in various ways. These include a link to further information not working properly, abbreviations not explained, repetition, and notes which give further information not linked to the points being clarified. Paragraph 14 of the Code says:

“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.”

85. The arrangements are not clear and so do not meet the requirements of the Code.

Catchment area

86. Criterion 4 is:

“Local Parishes: Children who live in the civil parishes of Tring, Tring Rural, Aldbury, Wigginton and Little Gaddesden. If there are more children living in these parishes than there are places, then priority will be given to those living in these parishes who live nearest the school. Parents can use the postcode finder on the Hertfordshire County Council website to check whether their address is in the catchment area.”

87. Criterion 4 is therefore referring to a catchment area and the catchment area is part of the arrangements. Information on the catchment area, beyond referring to parishes, is not published by the Trust with the admission arrangements. This makes the arrangements unclear and so not compliant with paragraph 14 of the Code, which requires admission arrangements to be clear. Paragraph 1.8 of the Code requires oversubscription criteria to be clear and as the catchment area is part of the oversubscription criteria, the Trust is also not compliant with the Code in this regard. The Trust said, in response to my enquiries, that it had asked the local authority for information on the catchment area and it had not been provided. As the Trust is the admission authority, defining and publishing information on the catchment area is its responsibility.

88. I note that the arrangements do include a post code checker so that those interested may enter their post code and find out for which school or schools they live in the catchment area. This is useful but does not meet the requirements of paragraphs 14 or 1.8 of the Code.

Admission to other than the normal age group

Paragraph 2.18 of the Code says:

“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.”

89. The information in the arrangements does not make clear the process for requesting admission out of the normal age group. There is information but it is muddled and thus unclear. The arrangements do not meet the requirements of paragraphs 14 and 2.18 in this regard.

Definition of the home address

90. Paragraph 1.13 of the Code says (as far as relevant here):

“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. This should include provision for cases where parents have shared responsibility for a child following the breakdown of their relationship and the child lives for part of the week with each parent.”

91. There are various references to the home address in the arrangements. The terms used are “living in the same house from Monday to Friday”, “where the child lives most of the time”, “in every case living permanently in a placement within the home as part of the family household from Monday to Friday at the time of this application”, and “If an applicant lives at more than one address, the sibling must also reside at the same address for the majority of the school week”. These different descriptions do not mean the same thing and this makes the arrangements unclear and not compliant with the requirements of the Code.

Supplementary information form

92. Paragraph 2.4 of the Code says (as far as relevant here):

“In some cases, admission authorities will need to ask for supplementary information forms in order to process applications. If they do so, they **must** only use supplementary forms that request additional information when it has a direct bearing on decisions about oversubscription criteria or for the purpose of selection by aptitude or ability.”

93. The 2027 arrangements have faith based criteria and so it is reasonable to use a SIF. The SIF asks for information on whether a child is looked after, lives in the catchment area or has a sibling at the School. This information is provided on the common application form and so should not be asked for again in the SIF.

94. The SIF requests information on the church attended and the frequency of attendance, which the clergy involved is asked to sign to confirm. The SIF then asks for a letter “detailing this involvement” of the child or family. I note that the faith body advised the Trust when consulted on the arrangements that:

“ Asking for a letter suggests extra information will be taken into account, instead of just the test in the policy (which would be a breach of the Code); the priest should just be asked to confirm that the attendance requirements set out above have been met by the child (6a) or one or more of the parents (6b)”.

95. The Trust said in response to my enquiries that the letter was required for confirmation. This is not the case. The priest's signature is confirmation of the attendance at public worship. By asking for a letter for further information, there is an implication that other information will be taken into account than that laid out in the oversubscription criteria. The arrangements do not comply with the Code in this regard.

96. The Code requires that the 2027 arrangements be amended to address the points set out here. Such amendments are permitted in line with paragraph 3.6 of the Code which states, in part:

"Once admission arrangements have been determined for a particular school year, they cannot be revised by the admission authority unless such revision is necessary to give effect to a mandatory requirement of this Code, admissions law, a determination of the Schools Adjudicator or any misprint in the admission arrangements."

97. The Trust must address these matters, as permitted by paragraph 3.6 of the Code, within two months of the date of this determination.

Determination

98. In accordance with section 88H(4) of the School Standards and Framework Act 1998, I do not uphold the objections to the admission arrangements determined by Ridgeway Learning Partnership for Tring School, for 2027/28.

99. I have also considered the arrangements under section 88I(5) and find that they do not comply with requirements relating to admission arrangements in the ways set out in this determination.

100. 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 this determination.

Dated: 24 September 2026

Signed:

Schools Adjudicator: Deborah Pritchard