

**LPLT Admission Consultation (Dec 19 – Feb 20) full data report:
Responses submitted not via the online form.**

All personal data has been redacted and appears as a white gap within the text

1. Following the release of the consultation papers, I have added my views to this email below regarding the consultation. As it is not clear from the questionnaire whether we are ticking boxes for Option A, B or indeed no change, I wanted to be clear that my opinion was included as below.

1) As a year parent

I have done my due diligence and been looking around local schools over the last two years of open evenings – I am sure you are aware this takes up a lot of evenings in September/October, many clash and they are exhausting. This was with a view to showing my daughter perhaps 3 or a maximum of 4 in September/October 2020 ahead of the big decision, with the knowledge of previous years' catchments/admissions helping us to shortlist. Option B would now mean that we would be forced to go around all of the schools that we think we MIGHT get into – but it would be a total lottery as catchments would be completely skewed with the new criteria. Many many year 5 students will not get their local schools. At the very least, if this Option was decided on, parents should have at least 2 years lead in time to look at schools and make informed decisions.

2) As a Year parent

We had the option of choosing Langley Park Primary for our Son in 2016. We spoke with the Academy Trust and with Bromley Admissions and were told there was not going to be a change in admissions, and therefore we decided to send him to

With the knowledge that it would have been a feeder school to Langley Park Secondaries I would have put it as my first choice with the catchment for Langley Boys being smaller than Langley Girls and therefore it being more difficult for us to get into.

It is unfair to change anything for the children that have been taken in before this consultation has gone out. At the very least any changes to the admissions policy should start from the next intake of Reception Parents (those that are able to make a decision after the result of the consultation) and take effect for when those students are in Year 6 (2027).

People then have an informed choice for primary schools in the area, Langley Park will be hugely oversubscribed but at least those that made decisions for schools before this consultation do not have choice take away from them.

3) As an active member of the and Volunteer at .

We have seen the impact of the opening of LPP in the past 3 years of Reception children at . This has had an impact on the funding of the schools and the PTA has had to fund many more 'everyday' things for the school (enrichment opportunities and equipment) than items and experiences that are additional to what the school offers. This has been bad enough for the last 2 years. With this consultation out, any parents who are facing a difficult decision between and Langley will now choose Langley. Equally, if Option 2 goes ahead, those parents will choose Hawes Down or Clare House over and other local primaries. Once again this is unfairly skewing admissions (and preventing local people going to local schools) but also potentially reducing the funding for .

4) As a

	<p>I do agree that it is good policy to have places for children at any secondary school that their parent works at. For me, this is a nice back up, but, the commute is really unrealistic for a just 11 year old from September 2021. However, I do think it makes sense that staff of both schools get a place for their children (girls or boys), and likewise that staff of primary schools should have guaranteed places at their primary schools.</p> <p>5) As a local person</p> <p>The increase in 'traffic' that option B will produce will cause havoc on the roads and cause congestion. Some children in Hawes Down live 2 miles or more from Langley and with Clare House this is even further. Many of these children will be driven to the Langley schools causing a lot more congestion both locally and within the Langley campus which is already overrun with cars in the morning. This will have a knock on effect on emissions, our children's health and road safety.</p> <p>I strongly feel that this will have a very negative impact locally and further afield, cause a lot of stress through the transition process for many 11/12 year olds and prevent the local community feel of schools in the area.</p>
2.	<p>I have already signified my objection to the changing of the admission criteria via your public consultation. However, I felt compelled to write an additional email on hearing an alleged 'rumour' that the proposed change to the admission policy was as a result of an action group of parents within LPPS.</p> <p>The alleged rumour is that a number of parents were told by a former head of LPPS that LPPS would be a feeder into LPSB & LPSG. I can understand that parents might be upset that this is not the case, however it was written clearly in the proposal documentation prior to the school being granted planning permission, previously clearly written on the school website and even now on the schools admission document for 2020/21 that this is not the case. So why the need to appease these parents if this allegation is true?</p> <p>If the alleged promise was made prior to LPSB merging with the LPLT in September 2018, then this could never have been the case as there was no school for boys to feed into within the previous academy of schools. Unless the statement was made by the current head then it must have been under the previous MAT. Are you in position to deny this?</p> <p>During the public consultation and on a Q&A document dated 27th January 2018 I quote:</p> <p>Q. Will the formation of a new MAT change current admissions criteria for partner schools? A. No. Admissions criteria will not change for any of the schools in the new Trust as a consequence of this merger.</p> <p>As far as I can tell nowhere has anyone ever put in writing that LPPS would gain feeder status. Maybe you could correct me?</p> <p>Reading the website below it appears that there are exceptions where being at a feeder school will not automatically gain a place at the secondary school, the key one in this case being distance.</p> <p>http://www.gettherightschool.co.uk/theimportanceoffeederprimaryschools.html</p> <p><i>'In respect of issues of distance a local education authority may refuse admittance if the pupil requiring a place lives – or has moved – outside the catchment area since attending the feeder primary school: in which case a place may be offered to a child who remains within the boundaries of the catchment area rather than to a child who has now moved beyond its borders.'</i></p> <p>While I can understand the logic behind LPPS being a feeder, there has only been one year where a catchment area has applied. This was in 2018 and was 2 miles, far greater than either secondary schools and therefore potentially granting access to LPSB & LPSG to pupils where it would have never</p>

	<p>been an option. Additionally the other primary schools within the LPLT, Hawes Down and Clare House, currently sit outside of the LPSB & LPSG catchment areas and again could potentially grant access to LPSB & LPSG to those for well outside of their current catchment areas. This would unfairly impact those that live closest to the secondary schools at a time when secondary school places in the London Borough of Bromley are already at a premium and many live in an area that does not fall into a catchment of a secondary school at all.</p> <p>I fear that by naming feeder schools that give priority to a secondary school sets a dangerous precedent and is open to abuse unless clear rules about remaining within a catchment area are written and communicated. In theory you could rent a house within a catchment to get your child into a primary school at 4 and then move straight out again safe in the knowledge that your child will attend the same schools for the next 14 years. This could encourage additional car journeys for those that are not local to the schools, increasing congestion, lowering air quality and unnecessarily increasing the carbon footprint of the schools at a time when environmental impact is a hot topic for debate.</p>
3.	<p>I have read the proposed criteria for entry into these schools, namely favouring 3 feeder schools. These feeder schools are in your Academy Trust.</p> <p>We are residents in _____, having moved here around 20 years ago in order that our children could attend the boys and girls schools. They were able to walk to and from school, attend after school activities and have many friends within walking distance of our house. These are just some of the benefits of a local catchment .</p> <p>Other benefits are environmental and traffic, important considerations as we all must move to a more sustainable lifestyle.</p> <p>There is no educational logic in you selecting the feeder schools that you propose. They are in your Trust and you are seeking to favour children from these rather than good schools closer to these secondary schools. Pickhurst and Highfield would be 2 examples of such schools. When Academies were introduced I do not believe that this sort of selection was envisaged. You are condemning local children and parents/carers to travelling greater distances by car or public transport where these may not even be available.</p> <p>LPSB has made great efforts to connect with the local community through the community choir, Filmbox and other events and clubs. Your proposals risk damaging these community links and we would urge that you reconsider these proposals.</p>
4.	<p>I am writing to you with regard to the Langley Park Learning Trust Admissions Consultation December 2019. I have already responded on the consultation form. Since I made this submission however, I am troubled by the research outcomes I find, beyond my first reaction I believe I have grounds to complain on breach of admissions code.</p> <p>In summary, the academy trust is going through a consultation, promoting a change in the historical allocation of secondary education places which appears to breach the Schools Admissions Code. I fear that a social injustice in education is about to be perpetrated in the name of narrow commercial interests.</p> <p>If we delve into the detail and look beyond the egregious breach of code, the proposal to introduce feeder schools would have a detrimental effect on the school places available for Bromley children. It will restrict places for local children through reducing the number of open places available, determined by proximity.</p> <p>The proposal is that a new admissions code will come into effect for the academic year 2021/2022. This coincides with a seemingly sustained period of child population bulge in the Bromley borough (ONS, Live births by local authority of usual residence of mother, General Fertility Rates and Total Fertility Rates, Aug 19). At this time and for some years to come there would be an increased demand, and consequently higher than usual over-subscription. The trust's proposals would exacerbate pre-existing oversubscription issues and increase the incidence of local children not securing a school place within a reasonable travel distance.</p>

In proceeding with the plans for feeder schools in this consultation the trust would be favouring some children who are more geographically remote from within the Trust's proposed feeder schools. Fewer children will therefore attend their most local school - children who, over the last few decades, would always have had these high schools as their most local option. The plans also create significant risk of children being unable to find a place at any local school.

The breach of the admissions code that I referred to earlier relates to discrimination.

Excerpt from:

School Admissions Code

Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels

December 2014

1.8 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, and that other policies around school uniform or school trips do not discourage parents from applying for a place for their child. Admission arrangements must include an effective, clear and fair tie-breaker to decide between two applications that cannot otherwise be separated.

The Langley Learning Trust propose to change to a feeder school system using schools from within their own Multi Academy Trust.

Using data from the English Indices of Deprivation 2019 they will be cutting out swathes of social housing and people of low education, low income and low employment in favour of more affluent catchment areas that surround the proposed feeder schools. This cannot possibly a result that our new Government will promote.

Further to this we can see from data on free school meals that the proposed feeder schools have a much lower incidence of families claiming free school meals than is representative of other more local primary schools in the existing catchments of the effected high schools.

- Hawes Down Primary School 4.6%
- Clare House Primary School 2.7%
- Langley Park Primary School 5.1%

For the 5 closest primary schools with overlapping catchments into the Trust's high schools catchments (Hawes Down and Clare House are geographically more remote than these first 5) the number of families claiming free school meals is noticeably higher on average.

- Unicorn Primary School 4.1%
- Oak Lodge Primary School 7%
- Orchard Way Primary School 14.1%
- Harris Primary Academy Beckenham 11.8%
- Pickhurst Junior School 5.9%

There is some small complexity to this as currently one of the proposed feeder schools Langley Park Primary School, has a very large catchment area. Arguably this could have made it more inclusive, and yet the free school meals % would suggest a lower incidence of benefit receiving families than is found in typical local primaries with smaller overlapping catchments to the high schools. Only 50% of current pupils at this primary school come from within the current high school catchment area (they are situated on the same geographic site). There are students currently travelling as far as 3.59miles to this primary school. I have used the Schools Census spring 2019 to identify catchments and median intake distances and is copy pasted below. This particular example is a new school and should this consultation take effect as the trust wishes, we may observe middle-class parents using their 'cultural capital' to negotiate access to a sought-after school of this nature. If they use this 'cultural capital', they might guarantee access to an excellent secondary education when they apply for reception at age 4 (Parsons et al. 2000 School Catchments and Pupil Movements: A case study in parental choice; Reay & Lucey 2010 Children, School Choice and Social Differences).

Langley Park Primary School

National School Census (Spring 2019)

URN	LA	Estab	Academic Year	MaxDist	AvgDist	MedianDist	Top1Decile	Top2Decile	Top3Decile	Top4Decile	Top5Decile	Top6Decile	Top7Decile	Top8Decile	Top9Decile
142897	305	2068	Reception	2.69	1.21	1.17	0.69	0.79	0.94	1.09					
	1.17	1.29	1.44	1.65	1.87										
142897	305	2068	1	2.8	1.41	1.3	0.8	0.98	1.13	1.19	1.3				
	1.52	1.63	1.88	2.43											
142897	305	2068	2	3.59	1.19	1.05	0.49	0.7	0.87	0.98	1.05				
	1.26	1.39	1.68	2.01											

In the very short term the most local children residing in social housing and the postcodes with the least affluent characteristics (largely isolated to the geographic periphery of the current catchments), will be the first to be denied a place at their most local secondary schools, if they are not currently in a proposed feeder school. This is because these are the first areas that will be eroded. In the longer term it is highly unlikely any of the outlying areas of social housing and areas of relative deprivation will be able to access a feeder school (as observed in the articles and ONS figures referenced above). It is likely that they will be displaced by the cultural capital of their middle class neighbours who can afford to move closer into a primary feeder school catchment to guarantee a place at their desired high school.

I urge you to weigh this on your conscience and help correct the course of action being suggested by the trust, this should be on behalf of the community and for the betterment of all.

I feel very strongly about this subject. As do the rest of the community, this is best shown in a petition signed by almost 3,000 local residents now opposing this change to admissions policy. I have a personal interest in the outcome but, more important than that, the Langley proposal is socially divisive. The Tory victory on 12th December was accompanied by commitments from the top to social justice. This is such a good example of injustice driven by commercial greed.

I am ready to meet you at any time if you would like to explore this subject further.

5. I was shocked to see that you are consulting on the introduction of giving priority status to feeder schools to admission to Langley Girls and Boys. Firstly i was disappointed that you would consider it appropriate to have the consultation phase over the Christmas period. It is obviously not a good time with families distracted by Christmas preparations. I am also shocked that this is being discussed as was it not 18 months ago that the Trust stated that it did not intend to convert their primary schools into feeder schools? If you had said that you had intended to do this, I suspect you would have faced opposition at the time.
- I have also found that when i have raised the matter with young families in the local area: those with toddlers who had assumed that the school path they as a family were on was 1) Oak lodge in a few years time as it is a small walk from their house 2) Langley Girls which is a 10-15 min walk away. They knew nothing of the possible changes that were being discussed via your consultation. I also have noted that every family that I have spoken to in West Wickham has expressed strong opposition to the feeder school idea.
- My concerns with the proposed policy change are largely around the negative impact that feeder schools would have on the school and especially on West Wickham.
- The children that would have a place guaranteed at Langley Boys or Girls by virtue of having attended a feeder school would not necessarily or even likely to be living any closer than children, currently attending Oak Lodge. If the admissions policy changes to one that prioritises feeder schools first and then distance the impact would be a shrinking of the catchment area. With pupils at the feeder schools having come from further away the catchment will shrink to probably less than 0.8 miles. This raises a number of problems and concerns:

	<ul style="list-style-type: none"> - it seems unfair that children living further away will get a place at Langley schools at the expense of children living nearer to the school. - the benefits the Trust claim are moderate to say the least: schools in the trust share the same values. I doubt the values of Oak Lodge differ that much to those of Langley Girls. - this will increase traffic on the roads as children from West Wickham in particular will have to travel by car / bus to another school - even though there is a secondary school within a 15 min walk away. At the same time children from the feeder schools will probably have to be bussed in to Langley. I am pretty sure that a schools admissions policy that fails to encourage children to walk to school is a bad policy. This is poor policy on environmental, child health and safety grounds. - Where exactly are children from West Wickham meant to go to secondary school? Hayes as our nearest other secondary school has a tiny catchment area and so West Wickham residents near the Travis Perkins roundabout would not secure a place there. - The policy also appears to me likely to have a negative social mobility impact. Currently some children from the Shirley area and those who attended Oak Lodge and Monks Orchard may be eligible for admission to Langley schools. These schools have a considerably higher number of children benefiting from FSM. I note that the feeder schools have around 3 percent of pupils on FSM whereas Monks Orchard has over 30 percent. The Trust would benefit therefor from having children statistically more likely to do well in public exams. - The introduction of these feeder schools is likely to result in a horrible sky rocketing of property prices near the feeder schools and increased scope for abuse of the admissions policy. Some parents will get their eldest into a feeder school when they are 4 years old and then move out of the area safe in the knowledge that they have bought a place at a great school until all their children have turned 18. This again will lead to the health and environmental negative impacts I mentioned above with people driving greater distances. It will also annoy lots of people that more families will be 'gaming' the admissions policy. Given the lack of obvious secondary school places for children in west wickham. <p>I hope you take these concerns on board. I would also appreciate it if you can explain the accountability process. Will you not change the admissions policy if the majority of people who respond oppose these changes? Will you listen to the views of Bromley Council and take these into account? If you decide to go ahead who could local residents complain to?</p>
6.	<p>Following your admissions consultation dated 9th December 2019, <i>Bromley-based Multi-Academy Trust</i> write to express strong objection to the proposed changes to the admissions criteria. <i>Bromley-based Multi-Academy Trust</i> and its school communities strongly objects to the proposal which is not in the spirit of the admission code, which will prioritise children attending Langley Park Learning Trust primary schools ahead of children from other schools.</p> <p>In reference to the Langley consultation document on the naming of feeder primary schools; the reasons for our objection are as follows:</p> <ul style="list-style-type: none"> - Langley Park School for Girls and Langley Park School for Boys are not 'all through' schools, so all primary schools in the vicinity should have equal access. - Any change in the Admissions Policy will limit the choice of secondary school for those pupils who do not attend a Langley Park Learning Trust Primary and live within the locality. - The change will set the precedent for other Multi Academy Trusts within Bromley which include both primary and secondary schools to alter their criteria. This will result in reduced choices for pupils who attend Bromley primary schools that are not part of a primary/secondary Multi Academy Trust. - The majority of the reasons given to prioritise children at Langley Park Learning Trust primary schools are generic working together practices across all schools. Consequently this is not a strong argument for change. - The proposal to ease transition arrangements for Langley Park Learning Trust primary pupils does not take into account that the secondary schools will need to consider the transition arrangements for at least 280 additional pupils transferring from other primary schools. - The consultation indicates that the Trust has designed their own curriculum including key standards for the end of Key Stage 2 in all subjects The 2014 Primary National Curriculum sets out these standards clearly for schools to follow. Therefore the rationale for change is not credible. - Based on the 2019 admissions data for Clare House and Hawes Down Primary Schools less than 50% of the Y6 cohort transferred to Langley Park Girls and Boys Schools. 37% of the boys from the two primaries joined Langley Park Boys School and 43% of girls joined Langley Park Girls School. The consultation is not clear on the destination of the remaining pupils at Hawes Down and Clare House Primaries and how this change would impact on the admission opportunities for those pupils at other local schools.

	<p>- If the Admissions Policy is changed, children from a greater distance away could join the Langley secondary schools by having attended the primaries in the Trust, therefore disadvantaging children from other local schools and living in proximity to the Langley schools. This is selective admission by stealth and not in the spirit of the way in which schools should be working together.</p> <p>- As a publicly funded body all families within the area should have equal access and not be disadvantaged by not attending a Langley Park Learning Trust primary.</p> <p>- The admission code and schools adjudicator is clear that there needs to be an educational benefit for the changes. The documentation and evidence does not support a clear impact on the educational benefits for naming feeder primaries.</p> <p>In reference to the proposed changes to give staff preference under the admission policy the Trust has responded neutrally to the staff employed at school level but disagrees with the priority list in the over subscription options:</p> <p>- The Trust has responded neutrally to option A for primaries, as the addition of staff employed and working at the primary school is a criteria in many individual schools to aid retention and recruitment. The admission proposal however does not give an indication of possible numbers per year, so the impact of the proposal on admissions is unknown.</p> <p>- It is noted that proposal places the children at Langley Park Primary School at a higher priority for admission at the secondary schools in option A and also Clare House and Hawes Down in Option B This is NOT acceptable to the Trust as it is not explicit within the response questions and comment sections against the admission code regulations. The Trust is strongly against this criteria in either option A or B of the over subscription criteria.</p> <p>- The Trust believes the changes to definitions on siblings and home address provides further clarity.</p> <p>- <i>Bromley-based Multi-Academy Trust</i> objects to the changes to tie breaker measure, to a random lottery and is perceived to be inequitable.</p> <p>In light of the above and referencing the Admissions code we strongly object to the proposed change to the Langley Park Learning Trust Admissions Code for 2021 -22.</p>
7.	<p>I would like to express my opposition to the Trust's proposal to restrict admission to the Langley Park secondary schools using just three primary schools as "feeder" schools. This proposal is extremely unfair and disadvantages many children in the local area. The admissions criteria should remain as it is, ie, proximity of home to school and the sibling rule, as it always has been. I know several families who have moved into the area specifically for their children to qualify for acceptance into one of the LP secondary schools and now they are in fear that they will lose out.</p> <p>The protest march which occurred on Monday is a measure of how strongly local people feel about your proposal and I would urge you and other senior members of the Trust to consider their views and do the right thing - abandon the feeder school proposal.</p>
8.	<p>Following your admissions consultation dated 9th December 2019, <i>Bromley-based Multi-Academy Trust</i> write to express strong objection to the proposed changes to the admissions criteria.</p> <p><i>Bromley-based Multi-Academy Trust</i> and its school communities strongly objects to the proposal which is not in the spirit of the admission code, which will prioritise children attending Langley Park Learning Trust primary schools ahead of children from other schools.</p> <p>In reference to the Langley consultation document on the naming of feeder primary schools; the reasons for our objection are as follows:</p> <p>- Langley Park School for Girls and Langley Park School for Boys are not 'all through' schools, so all primary schools in the vicinity should have equal access.</p> <p>- Any change in the Admissions Policy will limit the choice of secondary school for those pupils who do not attend a Langley Park Learning Trust Primary and live within the locality.</p> <p>- The change will set the precedent for other Multi Academy Trusts within Bromley, which include both primary and secondary schools to alter their criteria. This will result in reduced choices for pupils who attend Bromley primary schools that are not part of a primary/secondary Multi Academy Trust.</p> <p>- The majority of the reasons given to prioritise children at Langley Park Learning Trust primary schools are generic working together practices across all schools. Consequently, this is not a strong argument for change.</p>

	<p>- The proposal to ease transition arrangements for Langley Park Learning Trust primary pupils does not take into account that the secondary schools will need to consider the transition arrangements for at least 280 additional pupils transferring from other primary schools.</p> <p>- The consultation indicates that the Trust has designed their own curriculum including key standards for the end of Key Stage 2 in all subjects. The 2014 Primary National Curriculum sets out these standards clearly for schools to follow. Therefore, the rationale for change is not credible.</p> <p>- Based on the 2019 admissions data for Clare House and Hawes Down Primary Schools less than 50% of the Y6 cohort transferred to Langley Park Girls and Boys Schools. 37% of the boys from the two primaries joined Langley Park Boys School and 43% of girls joined Langley Park Girls School. The consultation is not clear on the destination of the remaining pupils at Hawes Down and Clare House Primaries and how this change would impact on the admission opportunities for those pupils at other local schools.</p> <p>- If the Admissions Policy is changed, children from a greater distance away could join the Langley secondary schools by having attended the primaries in the Trust, therefore disadvantaging children from other local schools and living in proximity to the Langley schools. This is selective admission by stealth and not in the spirit of the way in which schools should be working together.</p> <p>- As a publicly funded body all families within the area should have equal access and not be disadvantaged by not attending a Langley Park Learning Trust primary.</p> <p>- The admission code and schools adjudicator is clear that there needs to be an educational benefit for the changes. The documentation and evidence does not support a clear impact on the educational benefits for naming feeder primaries.</p> <p>In reference to the proposed changes to give staff preference under the admission policy the Trust has responded neutrally to the staff employed at school level but disagrees with the priority list in the over subscription options:</p> <p>- The Trust has responded neutrally to option A for primaries, as the addition of staff employed and working at the primary school is a criteria in many individual schools to aid retention and recruitment. The admission proposal however does not give an indication of possible numbers per year, so the impact of the proposal on admissions is unknown.</p> <p>- It is noted that the proposal places the children at Langley Park Primary School at a higher priority for admission at the secondary schools in option A and also Clare House and Hawes Down in Option B. This is NOT acceptable to the Trust as it is not explicit within the response questions and comment sections against the admission code regulations. The Trust is strongly against this criteria in either option A or B of the over subscription criteria.</p> <p>- The Trust believes the changes to definitions on siblings and home address provides further clarity.</p> <p>- <i>Bromley-based Multi-Academy Trust</i> objects to the changes to tie breaker measure, to a random lottery and is perceived to be inequitable.</p> <p>In light of the above and referencing the Admissions code we strongly object to the proposed change to the Langley Park Learning Trust Admissions Code for 2021 -22.</p>
9.	<p>Thank you for consulting with <i>Bromley-based Multi-Academy Trust</i> regarding the proposed changes to the admissions arrangements to Langley Park School for Boys and Langley Park School for Girls. <i>Bromley-based Multi-Academy Trust</i> welcomes the opportunity to respond to the proposal and has the following comments regarding the proposed changes to your admission arrangements, in our view:</p> <p>(1) The proposed arrangements will have a significant detrimental effect on the school places available for Bromley children</p> <p>(2) Restricts the choice for parents through reducing the number of open places available, determined on proximity</p> <p>The London Borough of Bromley is expecting a significant increase in the need for secondary school places in 2021. The proposed changes would exacerbate this issue and increase the likelihood of</p>

	<p>applicants not securing a school place within a reasonable travel distance. The introduction of the feeder arrangements will result in pupils that would have previously obtained a place based on proximity, no longer being successful and will make it more difficult to offer applicants one of their preferred schools. By treating Trust schools preferably, pupils may travel further with less attending their local school. The effect of these proposals would be that many local children would be unable to attend their closest secondary school due to places being taken up by Trust primary school children who live further away.</p> <p>The Langley Park Learning Trust's Option A under the proposed change would mean that children attending Langley Park Primary and living further afield will be given priority over local children who would currently get a place at either Langley Park School for Boys or Langley Park School for Girls, based on proximity.</p> <p>The Langley Park Learning Trust's Option B under the proposed change will result in up to 120 children from your proposed feeder schools having priority over children living closer to the school. The introduction of the feeder arrangements therefore will have a profound impact on local arrangements. It creates significant risk of instances occurring where applicants would not be eligible to a place at any other local school.</p> <p>In addition, please note:</p> <ul style="list-style-type: none"> - The change will set the precedent for other Multi-Academy Trusts within Bromley, which include both primary and secondary schools to alter their criteria. This will result in reduced choices for pupils who attend Bromley Primary Schools that are not part of a primary/secondary Multi-Academy Trust - As a publicly funded body all families within the area should have equal access and not be disadvantaged by not attending a Langley Park Learning Trust primary - The admission code and schools' adjudicator is clear that there needs to be an educational benefit for the changes. The documentation and evidence does not support a clear impact on the educational benefits for naming feeder primaries <p>We urge you to think again and think not only about the reputational damage this change will bring to your trust but the potential damage to the relationships with neighbouring schools and Trusts. <i>Bromley-based Multi-Academy Trust</i> therefore objects to the changes to the admissions arrangement you are proposing.</p>
10.	<p>Since you notified local families about your intention to change the admissions criteria I have watched with interest the reaction, and over reaction, of various impacted people largely across social media. I'm sure their views will filter through to your consultation process therefore I wanted to counter some of the opinions presented which I hope you will consider.</p> <ol style="list-style-type: none"> 1. Local schools for local children This point I agree with entirely and with paid access to school catchment data it is clear to see that some children are travelling from 2.5 miles away or more. Sadly under the current admissions criteria they would have a 7 year relationship with the school and trust but have no chance of continuing that into secondary education. Why one child should get in over another based on how many extra metres closer to the school they live is no fairer way of determining admission than your feeder proposals. In addition if you happen to live closer to LPSB/G then you'd benefit from Eden Park High opening and offering an extra 240 places to the 'local' community. 2. Lack of data or insight I am surprised that the information given to those being consulted hasn't contained much data on how you would anticipate the admissions change to impact future cohorts; this has been left open to interpretation and for people to make their own assumptions. You have noted that if all of the trusts primary schools became feeders then that would take 180 of the total 560 places and at the moment not all of the children (much less than half) actually take a place there. Some kind of future data modelling would have been useful to stop some of the hysteria around the catchment shrinking. You may be able to tell us that for 3 x future yr7 cohorts after the new policy goes live you'd need to make space for ~10 extra children who, based on their current location, wouldn't ordinarily have been admitted into year 7. You could also decide to add that many places across the 8 x yr7 classes for those 3 years and all of the arguments about lack of places goes away... 3. Social media influencing people's views Allowing people to draw their own conclusions has led to some bizarre concerns such as the below which has been shared to a number of sites where I believe people are being misinformed: <ul style="list-style-type: none"> • Children would be traveling unreasonable distances to alternative secondary schools and they have pointed at environmental and lifestyle issues being impacted. I'm sure that the people making this

	<p>claim don't scrutinise their own summer holiday plans in the same way and have no more desire to save the planet now than they did before.</p> <ul style="list-style-type: none"> Concerns over less affluent children attending LPSB/G based entirely on some calculations made on those children getting free school meals. As per point 2, perhaps there's some accurate data that could be presented to counter this bizarre argument and lay to rest any claims that there's some kind of social engineering going on. Shrinking of the Langley catchment and impact on Hayes. Not sure how this is relevant as if you live close to LP then Hayes Secondary would never have been an option. No-Mans Land for secondary schools in the south of West Wickham – this already exists however I would like to see the data and the impact changing admissions process actually has on this pre-existing problem. People have put a lot of energy into campaigning against these changes however the real campaign is one which fights for more secondary school places in the area. Local school competition and the way schools are now funded is the reality of the way today's education system works – people are only just realising. It isn't the trusts responsibility to create a community. People gaming the system will exist whether the criteria changes or not. You can't create a system that completely eradicates this behaviour. <p>In summary I would like to see my children continue their relationship with Langley Park, I want Hawes Down to benefit from being part of the trust. It would be unfair and strange to make only the on-campus primary (LPPS) the only feeder school particularly as you've made clear statements around the benefits of all 5 schools working together.</p> <p>Please don't let a campaign based on assumptions de-rail the changes. Please strengthen your proposals by doing some kind of impact assessment and reassuring local people that there is space for all local children.</p>
11.	<p>I have this morning responded to your consultation via the online form. In particular, your proposal regarding the introduction of primary feeder schools criteria for the Langley Park secondary schools, to which I strongly object I copy below my objection for your attention.</p> <p>I wanted to email by way of follow-up with a further, important, point, which I request you note in your consultation responses.</p> <p>The introduction of the proposed feeder schools criteria would result in considerable incentive for parents to "play the system" to guarantee primary and secondary school places for their children at your well-regraded Trust schools. At an extreme, a parent could live within the necessary proximity for one of the primaries for a very short period of time to get one child into the primary and then guarantee primary and secondary places for that child and any siblings, wherever they subsequently live. This is ridiculous and entirely unacceptable, running counter to the very principles of allocation of school places.</p> <p>I strongly object to the introduction of any primary feeder schools criteria for the Langley Park secondary schools.</p> <p>This would ultimately lead to children starting at the Langley Park secondary schools who would not have got in based on proximity - the key criteria in the allocation of school places across the Borough and nationally - and displace considerable numbers of local children who would otherwise have attended the Langley Park secondary schools. This would undoubtedly lead to a considerable number of local children being without suitable secondary school places in the local area and, I fear, having to travel significant distances to alternative schools. Surely this would have a damaging environmental impact, which must not be overlooked at a time when clearly we are all charged with reducing our environmental footprint.</p> <p>Further, this would place unfair pressure on Bromley Council in attempting to find the necessary secondary school places for the displaced children. The process of predicting and planning school places across the Borough is an unenviable task, and necessarily requires a long lead-in time. I cannot see how the Council will be able to respond to the knock-on impact of the feeder schools proposal coming into force to ensure the appropriate provision of secondary school places.</p> <p>I fully recognise the benefits of trust schools working together. However, these advantages have surely already been realised and do not require the introduction of the feeder criteria. The primary schools in</p>

	<p>question are all popular schools in their own right - albeit the Langley Park Primary is new I have no doubt from looking at it and discussing with other local parents that it will do well - and do not require the introduction of the feeder schools criteria to flourish. In fact, Clare House and Hawes Down are already very oversubscribed. Clearly the parents at these schools have never expected them to be feeder schools, and there is no evidence provided that this should change for those schools or Langley Park Primary. In fact, altering the secondaries' admission criteria as proposed will just add to already significant uncertainty on admissions.</p> <p>On a personal note, as a local parent of two young children, who myself grew up in Beckenham, I am very saddened and worried about the impact of these proposals and have no idea what secondary school my children would be able to attend if the proposals are realised. I appreciate that there is never any certainty in the provision of school places, but I, like all parents, plan ahead as far as we are able. My husband and I have bought a house in the local area, which is a considerable financial burden for us like most. Of course, I would never expect a decision to be made on the basis of one parent. But I am not alone - I simply reflect the vast numbers of other local parents who have invested (financially and otherwise) in the local area, and planned and hoped to make this our family's home for the long term. I am incredibly shocked and saddened that these proposals might alter this, and worried about what this means. Just as many other parents are.</p> <p>I strongly urge the Trust not to introduce any of the proposed feeder schools criteria.</p>
12.	<p>I am a local representative for the National Association of Schoolmasters & Union of Women Teachers (NASUWT), a large teachers' union organising across the UK and in all sectors of education. The NASUWT has members in most Bromley schools and colleges, including those in the Langley Park Learning Trust (LPLT) Multi-Academy Trust (MAT).</p> <p>The comments and observations on the LPLT's proposals for changing its pupil admissions arrangements set out below have been arrived at after discussion with appropriate persons in the union both at local and regional level. They are also in line with the nationwide objectives of the NASUWT and its national policies.</p> <p>The response has been placed in the general section of the consultation response form given the NASUWT is an interested organisation.</p> <p>The NASUWT sees all state schools in an area (viz. the London Borough of Bromley) as a part of a national education system dedicated to providing the highest possible standards for all pupils. Thus it follows that the NASUWT wants a fair, equitable and transparent system of pupil admissions across all types of mainstream state schools.</p> <p>On principle the NASUWT opposes the central proposal of the LPLT: to change the status of its own primary schools to give the pupils in those schools priority in admissions to its secondary schools. The supporting argument for this change that these 'feeder schools' will be better able to solve the problems that some pupils experience on transitioning from primary to secondary school is simply a non sequitur.</p> <p>Rather the main reason is that the LPLT is trying to 'look after' its own primary schools in the face of falling school rolls brought on by the over-supply of primary school places in Bromley. Such a protectionist strategy may work in favour of LPLT primary schools initially but will increase egregious competition between schools in the local area. This, in the view of the NASUWT will do nothing to raise standards and attainment in general. Indeed it may well amongst other unintended consequences lead overall to more selective pupil admissions in the local area.</p> <p>All Bromley schools (and their MATs) should be getting together to ride out this particular crisis. The NASUWT urges the LPLT to abandon its proposals for changing its pupil admission policy and thereby serve the greater good for the local community.</p>
13.	<p>I have today responded via your online form to note that I strongly disagree to your proposals to give priority to so-called feeder schools. It has no sound educational basis, is against the spirit of the admissions code and will unfairly impact schoolchildren in the local area.</p>

	<p>Given the importance of the matter, I am also emailing you now, and copying in my local MP and councillor as well as Mr Stewart. Your proposal will have a hugely negative impact on schoolchildren across the borough of Bromley, and I wanted to make them aware of my views which I know are shared by many.</p> <p>There is no sound educational basis for the change. The reasons given about integrated learning for your primary and secondary children are inadequate. All schools across the borough observe the national curriculum. All schools in year 7 are expert in welcoming children from different schools and ensuring they all arrive rapidly at the same level of learning etc as they make the transition into secondary. As you will continue to accept children outside of your feeder schools, you will of course be professionally and legally obliged to meet their needs. Therefore, this argument that school children at your Trust primaries need priority is unsustainable and clearly unfair.</p>
14.	<p>Following the Langley Park Learning Trust's Admissions Consultation dated 9th December 2019, I write to express my strong objection to the proposed amendments to the current admissions criteria.</p> <p>Following your proposals, I shall address my response in order:</p> <p>Naming Specific Feeder Schools</p> <p>I strongly oppose the naming of a feeder primary school for the following reasons:</p> <ul style="list-style-type: none"> • This is unfair and unethical and has a detrimental impact on the secondary school places available for children in the local area, whilst allowing others access to a secondary school at a further distance, by the mere lottery of which Primary School their child happens to attend. • This sets a dangerous precedent for other Multi Academy Trusts within Bromley which include both primary and secondary schools to alter their criteria unfairly impacting and restricting choice for those families whose children attend Primary Schools with no link to Secondary Schools, and reducing the number of open places available, determined on proximity. • It would exacerbate the likelihood of local children not securing a place within reasonable travelling distance; impacting both the developmental benefits of children independently getting themselves to school on foot, and the environment due to more travelling to school by car or transport. • The introduction of feeder schools, will result in pupils that would previously have obtained a place based on proximity no longer being successful and making it more difficult to gain a place in a preferred or local school. This proposal creates a significant risk of instances where children would not be eligible to a place in any local secondary school. The figures quoted in the response by Bromley Council, highlight this. • As a publicly funded body all children within the area should have equal access and not be disadvantaged by not attending a Langley Park Learning Trust primary. • The admission code and schools adjudicator is clear that there needs to be an educational benefit for any changes. The argument that a more coordinated transition between Primary School and Secondary School for children is untenable, as there will still be at least 340 children transitioning from other schools which are not part of the Langley Park Learning Trust and who won't have benefitted from this so called advantage, potentially creating a two tier system. The 2014 Primary National Curriculum clearly sets out the standards all schools should adhere to and with a little common sense and coordination, children may be sensibly transitioned to any school in the Borough, as has been the case to date. The rationale stated for change is not credible. <p>These principles apply both to Option A and Option B.</p> <p>Children of Staff</p> <p>The proposal to give priority to the children of staff employed at the secondary schools in the Langley Park Learning Trust has my support and is in line with admissions arrangements across the borough.</p> <p>I oppose the proposal to give priority to the children of staff employed at the primary schools in the Langley Park Learning Trust as this will significantly decrease the availability of places available to the rest of the community in line with other arguments expressed above. I would support the children of the staff employed at the primary schools in the Langley Park Learning Trust having priority in the primary school in which their parent is employed.</p>

	<p>Changes to definitions</p> <p>The changes to definitions on siblings and home address provides further clarity and is therefore welcomed, although this should be considered as an amendment made for all admissions criteria across all schools, not just those within the Langley Park Learning Trust. The proposed changes to the tiebreaker measure as a random lottery in terms of Home address may also have some merit, but should be considered as an amendment made for admissions criteria across all schools, not just those within the Langley Park Learning Trust.</p> <p>As a local resident with children at _____, the proposals do not directly impact us personally but I felt it important to provide feedback in the spirit of fairness for the wider community and to support ethical principles should other Trusts consider similar initiatives.</p>
15.	<p>The Bromley Green Party would like to object to the proposed Langley Park School catchment area extension, more specifically in relation to the proposed feeder schools Clare House and Hawes Down.</p> <p>This relates to two aspects:</p> <p>1) Environmental reasons: Opening up the catchment area to Clare House and Hawes Down would increase journeys by car and exclude pupils from the locality. They in turn would have to travel further to attend schools not on their doorstep. Although buses are available from each of the two schools to Langley, many children in the lower years do seem to be driven to and from school already. Overall, there would be an increase in air pollution which is also not consistent with Bromley Council's plan to reduce CO2 emissions.</p> <p>2) Social equality reasons: A further aspect related to diversity, and it appears that Clare House, for example, has 93% of pupils with English as their first language; other local primary school have a lower percentage. So the proposals will not help diversify the student population.</p> <p>Thus, our party would like to oppose the proposals on both environmental and social equality grounds.</p>
16.	<p>I would like to register strong disagreement with the proposal to introduce Feeder Schools (Secondary Schools)</p> <p>This proposal discriminates against children that have not attended the preordained feeder schools, irrespective of the location of their home. The catchment area policy may have its shortcomings but it works when applied consistently and uniformly across the land. If the Langley schools apply this feeder school approach, out of step with the rest of the borough, it will leave orphaned tracts of properties close to the school, where families live and suffer the congestion and hordes of attendees during rush hour without the right to attend the schools.</p> <p>This will lead to resentment of the schools, the attendees and the trust.</p> <p>Furthermore, large areas in the immediate proximity to the schools do not fall within the catchment areas of other second level schools and this is fundamentally unfair.</p> <p>I have a real fear of elitism amongst a small group of primary institutions, creating a monopoly of the fantastic secondary facilities that Langley schools have to offer.</p> <p>No provision has been made for families moving to the area, to as to how they can avail of the right to attend convenient secondary school. This proposal should be thrown as being elitist and out of step with the approach for secondary education in the borough and the rest of nation. If some with vested interests feel that they are getting 'a first mover' advantage in proceeding with this, I sense a conspiracy and will have no hesitation raising the matter with the Ombudsman and ensuring that a full and thorough investigation into the key protagonists and their motives for proceeding with this discriminatory policy.</p> <p>Definition of Sibling. The document on this web site gave a description of a change but did not give the new definition. This is not transparent and not acceptable. Full disclosure on the current and proposed definitions need to be clearly laid out, as well as the rationale and proposers of the change.</p>

	<p>Definition of Child's Home Address. The document on this web site gave a description of a change to the child's home address but did not give the new definition. This is not transparent and not acceptable. Full disclosure on the current and proposed definitions need to be clearly laid out, as well as the rationale and proposers of the change.</p> <p>TIE BREAKER. I am somewhat neutral on this proposal, but because the Code for fairness has not been made available, I cannot support a change.</p> <p>Year 12 Published Admission Numbers (PANs). The proposal is poorly drafted and does not explain how pupils of the girls school attending the boys school are treated under the PAN regime. Further more the motives and arguments for and against the change are not made plain.</p> <p>OTHER COMMENTS OR OBSERVATIONS. This response form is overly long and complicated and designed to confuse and distract from the key issue.</p> <p>NO FEEDER SCHOOLS NO ELETISM SECONDARY SCHOOL EDUCATION FAIR TO ALL CHILDREN IN THE AREA.</p> <p>It would also seem that under the umbrella of this there are lots of details being railroaded through - why redefine definitions of siblings and home address - something in this process appears to have unseen motives, and i would like to see full transparency on the meetings that gave rise to these proposals and consultation. In particular i find the follow statement objectionable "it is not possible for the Trust to schedule meetings with groups of parents and there is no obligation on the Trust to do so".</p>
17.	<p>, my family and I currently live in West Wickham. I have completed a consultation form but as I feel strongly about this issue, I wanted to also write separately to express my views on the proposed changes of which I am supportive, I believe the adoption of the proposed feeder schools approach will benefit the trust as a whole but only if all primary schools within the trust are adopted as feeder schools.</p> <p>My Rationale is as follows;</p> <ol style="list-style-type: none"> 1) Education standards and best practise can be unified across the whole trust ensuring standards are maintained current OFSTED ratings are maintained if not improved across the whole trust. 2) Pupils within the primary school will know the secondary they may attend and the standards expected both educational and behavioural thus making the transition that little bit easier 3) The feeder school approach will benefit the primary schools by ensuring application numbers remain high and thus funding from government will be maximised to the benefit of all the pupils within the trust. <p>There has been what I can only express as hysteria across the local area within social media and this I believe has kept many parents from expressing their support for these proposed changes, I understand the sentiment of many of these posts around catchment area and keeping schools for local children however they all conveniently forget to mention the following;</p> <ol style="list-style-type: none"> 1) The Langley Park catchment area is currently so small that local children are not able to attend the Langley park secondaries, at present looking at last years catchment areas <p>thus rendering the many environmental arguments contrary and null.</p> <ol style="list-style-type: none"> 2) The trust has been set up to support and consider the best interests for all children within the trust not all children within the local community. 3) Unfortunately catchment areas issues/problems will not go away with this change it will simply change the shape of the issue, thus I believe a lot of what you are reading on social media is being driven by peoples own self interest.

	<p>4) The proposal is only that the primary schools become feeders and get preferential ordering in the case of over subscription it is not a dictate that they must send their children to these schools and other secondary schools are still an option available to all, even in the unlikely case that all children from the feeders subscribe then there is still approx well in excess of 50% of places available/free for other children within the local area.</p> <p>I believe these change will benefit the trust and subsequently the children attending the schools within the trust and option B should be adopted.</p>
18	<p>I am writing on behalf of _____ Local Committee (formerly governing board), to object to proposals by Langley Park Learning Trust (LPLT) to make changes to its admissions criteria.</p> <p>We believe the proposals to establish any of Clare House Primary School, Hawes Down Primary School and LPLT as feeder schools would be damaging for our community, disrupt the local network of schools and limit choice and life chances for children in the area.</p> <p>Additionally I would like to refer to an individual letter written by one of our members setting out how the proposals are in contravention to the statutory requirements of the Schools Admissions Code and, as such, would be referred to the Office of the Schools Adjudicator if pursued.</p> <p>We believe the proposals would limit the choice for Balgowan leavers. Many _____ pupils have opted for Langley Park Schools as their first choice for many years. The use of feeder schools will significantly limit the places open for pupils outside the feeder network - according to 2019 admissions data fewer than half of year 6 pupils from Clare House and Hawes Down moved to a Langley Park senior school that year. We also object to the proposal to give priority to the children of staff employed at the secondary schools, as this would restrict choice for children of staff at _____ and other primary schools in the area.</p> <p>_____ and Langley Schools, and their respective communities have long been entwined. As pupils from our school have moved on to Langley senior schools, many of their parents have contributed significantly to school life at both schools, such as through their PTAs. Restricting Langley Schools' admissions criteria puts these long-standing relationships and community links at risk. It also threatens to limit the Langley Schools' own sphere of influence and status within the wider Beckenham community.</p> <p>We are deeply concerned that that should either proposal succeed it will prompt a series of copy-cat measures – catalysing a land grab by other local secondary schools to secure their own feeder schools. This would:</p> <ul style="list-style-type: none"> • Entrench the effect of limited choice on pupils, not just at _____ but across our community • Open the door to ever more selective admissions – thus creating another socio-economic barrier for pupils from more disadvantaged backgrounds • Lead to fragmentation within our community <p>We believe that our pupils' futures and our community cohesion is too important to put at risk and respectfully ask LPLT to reconsider and withdraw these admission proposals.</p>
19.	<p>I have been contacted by several constituents regarding the Langley Park Learning Trust admissions consultation.</p> <p>It is my understanding that the Trust are consulting on several changes to the admissions policy for 2021. Primarily, I understand that the Trust is proposing to name its primary schools as feeder schools, with two possible options for consideration.</p> <p>I am informed that the first option for consultation proposes to name Langley Park Primary School as a feeder school for both Langley Park Girls and Langley Park Boys Schools. The second option proposes that Langley Park Primary School, Clare House Primary School and Hawes Down Primary School will become feeder schools to both secondary schools.</p> <p>I have been contacted by several constituents who oppose the naming of any feeder schools. There are strong concerns that the naming of a feeder primary school will have a detrimental impact on the choice families have when applying for a secondary school place.</p>

Competition for school places in the local area is already high, and I am concerned that any change to the Admissions Policy will limit the choice of secondary schools for pupils who do not attend a Langley Park Learning Trust Primary.

In addition to this, there are concerns that the creation of a feeder primary school may set a precedent for other Multi-Academy Trusts within Bromley to similarly alter their criteria. Many fear this would result in further reduced choices for pupils who do not attend a primary/secondary Multi-Academy Trust.

I understand that, should the Admissions Policy be changed, children who have attended primary schools within the Trust would gain priority over children who live in proximity to either Langley secondary school. I understand that within the local area and excluding Clare House, Hawes Down or Langley Park Primary School, there are at least ten primary schools which look to be affected by this change.

I have been contacted by local parents who are understandably concerned about this issue and hope you will take these points into consideration throughout your consultation period.

I have also sent a copy of this letter to the Secretary of State for Education to make them aware of this issue.

Fair Admissions for Langley Feeders

TL;DR – One Paragraph Summary The LPLT proposals will disadvantage hundreds of local children, in particular those from disadvantaged backgrounds. It will remove parent choice, increase traffic, harm the environment and divide the community... all for no discernible educational benefit.

Executive Summary – The Main Points The Langley Park Learning Trust are consulting on a change to the way they admit pupils to their two secondary schools. The central proposals are that primary schools in the Trust become ‘feeders’ for the secondary schools. Children attending those schools will get priority over children at other primary schools in the area.

These proposals are ill-advised and will have a negative impact on local children, the quality of education, and the community.

Shrinking ‘catchment areas’ will deprive many local parents of any choice, while the knock-on effect of small catchments at other schools will mean that many non-Trust children will find themselves unable to attend any local school. The policy will also discriminate against poorer children, which is directly against the Department for Education policy to tackle social mobility.

The policy will force more children (both at the two secondary schools, and those forced to attend a school elsewhere) to travel to school by car, which will increase carbon emissions. More cars on the roads around schools will impact on child safety. The feeder schools policy will also have a negative effect on non-Trust primary schools, who may see applications drop due to no fault of their own. This in turn highlights divisive nature of the policy, which contrasts with the Trust’s aim of playing a positive role in the community.

The nature of the consultation itself has drawn criticism. The figures given in support of the proposals are incomplete, and no wider impact study appears to have been conducted. Crucially, none of the reasons given for the change are persuasive of the need to change policy. These flaws, together with the unfortunate timing of the consultation, has created the impression that the consultation is not genuine, but is instead a paper exercise designed to rubber-stamp a decision that has already been made.

There is widespread opposition to the plans. The local MP, local councillors, the London Borough of Bromley, the other local Multi Academy Trusts (MATs), teachers’ unions, Park Langley Residents Association, and local environmentalist groups are all opposed to any change. 3,500 people in the local community signed a petition against the proposals.

1. The Proposed Changes The Langley Park Learning Trust (LPLT, “the Trust”) are consulting on a change to the way they admit pupils to their two secondary schools: Langley Park School for Boys (LPSB) and Langley Park School for Girls (LPSG).

There are two main proposals. The first is to name Langley Park Primary School (LPP) as a 1 feeder school to the secondary schools. The second proposal is to name all three primary schools in the Trust (LPP, Clare House and Hawes Down) as feeder schools. Children attending feeder schools will receive priority over children attending other primary schools. The remaining places will be allocated to children from other primary schools, based on the normal 'proximity' criteria.

2. The Negative Impact of the Changes Data from the Mayor of London's mapping service shows that children from Hawes Down 2 and Clare House schools live further away from the secondary schools, compared to children attending non-Trust schools – in particular Pickhurst, Oak Lodge and Unicorn. Meanwhile, Langley Park Primary school has a huge 'catchment area' with children living many miles away.

In its consultation document, the Trust presents figures which imply that the effect of the policy changes will be small. For reasons explained in greater detail below (section 3.1) this is unlikely to be the case. Crucially, if the impact were not significant, the policy would be a failure on its own terms.

Analysis of the available figures suggest that a far more likely outcome is that children admitted under the new policy will not be exactly the same set of children that would have been admitted under the standard 'proximity' policy.

Therefore, when children from the Trust primary schools are given priority over other children, the 'catchment area' for non-Trust children must shrink significantly. This will have a number of negative effects.

1 Consultation documents and FAQs are online: <https://www.lplt.org.uk/617/lplt-consultation-on-admissions-december-2019> 2 <https://maps.london.gov.uk/schools/>

2

2.1 Unfair impact on local children and families

2.1.1 Denial of opportunity to attend the nearest school The first and perhaps most important effect of this policy is that every year, many children will be denied any opportunity to attend their nearest school. This places a significant burden on families whose lifestyles are arranged for living in a London borough, and time will be wasted travelling that could otherwise be spent at home or at work. Even a relatively small change in travel distance can have significant impact on a child's education, and the family's time, well-being and finances – especially if it means the difference between a child walking to school independently, or being driven by a parent.

This problem will affect children living near to the Trust secondary schools, and also those living near other schools in the borough – in particular, Hayes School (see 2.1.2 and 2.1.3, below).

2.1.2 Shrinking catchment for other secondary schools The shrinking of the Langley secondary school's catchment areas will have a knock-on effect on other schools' catchments, at both primary and secondary stages. The demand for secondary school places in Bromley borough is already incredibly high and the shrinking of a catchment of the Langley secondary schools will increase the demand (and reduce the catchment) for places at other secondary schools such as Hayes. Families who had intended to send their children to a secondary school other than Langley Boys or Langley Girls, may find that the policy inadvertently excludes them from their nearest school.

2.1.3 Stranded in no-man's land The shrinking of the Langley catchment area (see 2.1.1 above) and other catchment areas (see 2.1.2 above) will lead to the creation of a 'no man's land' for secondary schools in West Wickham, where many residents find themselves outside any catchment area. This concern was raised by the London Borough of Bromley in its consultation response.

A no-man's land will be a particular issue for residents to the south and east of the Langley schools, where the next nearest secondary is Hayes. In 2019 admissions, this school had a catchment of 0.9 miles, which already excludes much of West Wickham. This is in contrast to provision to the north of the Langley secondary schools, where there are two secondary schools (Harris Academy Beckenham, and Eden Park High School) which are local to children from the area surrounding Clare House Primary.

A school admissions 'no-man's land' is foreseeable and probable. It should not be allowed to develop.

2.1.4 Denial of choice The issues above amount to a denial of choice for the parents of children at non-Trust schools.

2.1.5 No sibling priority for non-feeder school children In its documentation, the Trust is keen to point out that a few places at the Secondary school will be available to children who have not attended a non-feeder school. However, the sibling priority rules will not be applied horizontally between Langley Park Girls and Langley Park boys for these applicants.

By contrast, since the Trust's feeder schools do operate a sibling-priority policy, families with children at trust schools will gain an additional admissions advantage over non-trust families. This is unfair in itself, and could also amount to gender discrimination.

2.2 Impact on other local schools As discussed above (section 2.1) the proposed policy will inevitably result in more parents choosing one of the Trust's primary schools as their first choice school. There currently surplus primary school places across the borough, meaning a loss in government grant income for most primary schools. If the policy is introduced, the Trust primary schools will fill to capacity. The empty places – and the associated loss of income – will be transferred to other schools.

The existing system incentivises schools to improve standards. The 'marketplace' for pupils is based entirely on two factors – the birth rate, and the quality of the school. No-one can control the first of these factors; but it is within the school's ability to affect the second. Outstanding schools fill their places quickly; those that require improvement will struggle. Whether this is appropriate or not is a debate for another time, but it is the framework within which the West Wickham schools currently operate.

The proposals distort this system, and warp the rules in favour of the Trust's primary schools. The other infant and primary schools in the area will experience a drop in admissions despite any measures they may take to keep their school as good or outstanding. Meanwhile, should any primary school within the Trust experience a slide in quality, there is less incentive to improve. Places will continue to be taken up, as parents tolerate a 'so-so' primary in order to gain access to the well regarded secondary schools. Messages posted on social media suggest that this is already happening with regards to primary school applications for 2020/21.

The proposals will therefore cause an unfair reduction in funds available to other schools, and discourage the drive to excellence at schools within and outside the Trust.

It is noteworthy that the current glut in primary school places has come about in part due to the creation of Langley Park Primary, the newest school in the area... and part of LPLT. The

Trust's proposals seem designed to solve the fact that this school is undersubscribed. A situation has therefore arisen whereby the Langley Park Learning Trust will solve its own admissions problem by passing the burden entirely onto other schools in the area. This is not fair.

2.3 Widening inequality Inequality will be further exacerbated by the proposed admissions policy's interaction with the particular geography of West Wickham. Using the percentage of free school meals as an indicator, it is clear that the area to the North and West of the Langley Park site (Eden Park) is less affluent than elsewhere. As the catchment area for the Langley Park secondary schools contracts, this area of the borough will be the first to be excluded.

Analysis of government data suggests that the outer limits of the 'catchment' area are less affluent than the area immediately surrounding the school. Regardless of which schools gain 'feeder' status, any contraction of the 'catchment' areas around the school will result in a drop in the number of Free School Meals figure. For LPSB this could be a drop from 9.1% to 3.3%, and for LPSG a drop from 11.5% to 4.9%. 3

Meanwhile, the feeder primary schools are currently more affluent than the non-feeder primary schools. The free school meals figure for Clare House is 4.3% and for Hawes Down it is 5.9%. By contrast, the schools that until now have supplied significant pupils to the LPLT secondary schools have far higher numbers: Oak Lodge 9.8%, Pickhurst 9.9%, Marian Vian 10% and Monks Orchard 37%. Unicorn, the nearest school to the secondary schools after LPP, has a much lower figure of only 4.7%. 4

The contracting catchment area, and the particular demographic make-up of the proposed feeder schools compared to schools outside the Trust, will result in fewer pupils from poorer households able to attend the Trust's secondary schools.

Regardless of the Trust's intent, the proposals will quickly result in social sorting. This is a wholly undesirable outcome for schools that are funded by the tax-payer, and must be resisted. The trust has

not addressed this at all in its proposals, and it is difficult to see how it could prevent such social stratification taking place, without instituting controversial policies of selection or affirmative action.

Given the figures, this outcome is also predictable. It is therefore contrary to paragraph 1.8 of the School Admissions Code 2014: 5

Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group ... (Page 10, emphasis added)

3 Based on our campaign team's own analysis of demographic data for the area. 4 Data from the Department for Education's 'Find and compare schools in England' service <https://www.compare-school-performance.service.gov.uk/> 5 <https://www.gov.uk/government/publications/school-admissions-code--2>

2.4 Impact on the wider community People move to areas with good public services. There is no shame in working hard in order to afford to buy a house near public transport links, shops, entertainment and good schools. The West Wickham community and economy thrives in part because of its excellent education provision, which encourages families to move to the area and settle long-term.

The proposals will interfere with this. As the catchment area for the secondary schools and their feeder primaries reduces, it is inevitable that there will be some 'gaming' of the system, either through short term renting or an increase in house prices for a limited number of streets in Park Langley. Housing on most other roads will be less attractive. The changes will benefit the already wealthy, who will be able to outbid those with less money.

2.5 Impact on the environment As discussed above, the policy will mean more children travelling further distances, both to the Langley schools and to other schools. This must result in greater car-use on school days. The amount of additional CO2 emitted cannot be precisely calculated, but if just one extra child made a 2km car journey to and from school, this would result in approximately 96kg of CO2 emitted into the West Wickham atmosphere, every school year. The true 6 'carbon footprint' will be many multiples of this figure – many tonnes of carbon dioxide.

Knowingly increasing pollution in this way is entirely at odds with the Bromley Council Local Air Quality Action Plan. This may not weigh heavily on the minds of the decision-makers 7 within the Trust, or indeed the parents driving their kids to school. But it is an undeniable negative point against this policy. The trust appears to have not considered this at all, and has offered no mitigation for the environmental effects.

Bizarrely, the Trust very recently stated its support for policies which improve the environment and reduce car use. In a letter to LPSB parents on 9 January 2020 entitled 'School Streets – Keeping Our Children Safe,' the case for reduced car use was made in terms of road safety and environmental impact. It is odd that such concerns are not addressed in the consultation document.

This assumes the average car emits 123.4 g of CO2 per km <https://www.eea.europa.eu/highlights/average-co2-emissions-from-new> Some cars emit less and some emit more, so the true figure can never be known without an audit of parental vehicles! But the order of magnitude – tonnes of CO2 – is correct. 7

https://www.bromley.gov.uk/downloads/download/246/air_quality_action_plan

3. The LPLT consultation notice The Trust has supplied a consultation notice, which sets out explanations for the proposed changes. The document is the Trust's only published case for the new policy. In its various 8 aspects, set out below, the notice does nothing to support the proposals. Indeed, in places it reinforces the argument for retaining the status quo.

3.1 Admissions numbers

3.1.1 Underestimating the uptake from the Trust primary schools The Trust presents admission data for September 2019 as evidence that the feeder schools will only supply a small number of pupils to the secondary schools: In that intake, 59 children joined from Hawes Down and Clare House. However, this data:

- Does not include Langley Park Primary, which does not yet have Year 6 pupils;
- Is for admissions to the secondary schools, not applications . The number of pupils who placed either LPSB or LPSG as a choice is conspicuous by its absence.
- Does not include pupils who chose either LPSB or LPSG but

were outside that year's 'catchment.' • The admissions policies themselves influence selection choice. Parents living well outside the catchment might not have bothered to rank LPSB or LPSG on their choice of school. But if their child attends Hawes Down or Clare House, now they will.

Indeed, the whole point of a 'feeder schools' policy is to increase the numbers of pupils from the Trust's primary schools attending the secondary schools (see 3.1.3, below). If the Trust fails to convert the overwhelming majority of its primary pupils to secondary pupils, then it will have failed on its own terms.

3.1.2 Overestimating the availability of places available to non-Trust children In the consultation document, the Trust explains that the combined Published Admissions Number (PAN) for LPSB and LPSG is 460 pupils. The PAN for the proposed feeder primary schools is 60 each, so 180 in total. This leaves 280 places for non-feeder school children. This calculation is incomplete and misleading.

The Trust characterises 180 as the upper limit on admissions from its feeder schools. The language of the consultation document ("even if Year 6 at all three primary schools is full, and even if all Year 6 pupils transferred to one of the Trust's secondary schools..." 9 emphasis added) implies that it is unlikely that a full complement of pupils from feeder schools will transfer. This is a misleading assumption. Far more likely is that the three feeder

8 The Consultation Notice may be found at

<https://langleypark.s3.amazonaws.com/uploads/document/LPLT-Admissions-Consultation-Notice.pdf> 9 Consultation notice, page 6

schools will always be full, and that nearly all will transfer to the highly regarded secondary schools.

Moreover, in its calculations, the Trust does not account for other sources of admission. Since the secondary schools are so well regarded, it is highly likely that they will be the choice of looked-after children and their siblings. The trust also proposes to grant priority status to children of teachers at any of the five schools in the Trust.

There will also be siblings of existing pupils, who may not necessarily attend one of the feeder schools. An analysis of school census figures for the most recent year shows that siblings and SEN accounted for 28% of places in LPSB and 21% at LPSG.

These factors will amount to a non-trivial reduction in the availability of places for children from non-Trust primary schools. The consultation document does not mention this at all, let alone attempt to quantify the scale of the decrease.

What is clear is that these additional admissions will eat away at the number of places available to 'all other children,' shrinking the catchment areas even further.

3.1.3 The self-contradictory nature of the consultation document The Trust extols the benefits of its 'all through education' offer to its pupils (see 3.2 below). The ostensible *raison d'être* of the admissions policy, as set out in the consultation document, is so that pupils gain maximum benefit from the Trust schools' collaboration. The Trust cannot simultaneously trumpet the virtues of its combined approach, while at the same time implying that less than half of its primary school pupils will actually take up the secondary school offer. Indeed, if this were the case, the Trust would have failed on its own terms!

Overall, the implication from the consultation document is that the feeder school status of three primary schools will not significantly increase secondary school applications from those primary schools. This is not credible. Places available to the rest of the community will significantly decrease, bringing about the negative effects outlined in section 2, above.

3.2 Feeder Schools and 'All-Through Education' The consultation document cites 'all through education' as the reason for implementing a change in its admissions policy.

3.2.1 A weak case for change The Trust provides a long list of collaborations between the secondary and primary schools within the MAT. While the extent of the collaboration is admirable, sixteen out of the seventeen examples listed simply restate the known benefits of being in a Multi-Academy Trust (such as professional support, administration efficiencies, sharing facilities and best practice).

None of the examples of collaboration have anything to do with the case for the feeder school admissions policy. All concern the quality of education in general.

Only the second bullet point speaks directly to the transition between primary and secondary schools. Again, it is admirable that teachers liaise on KS2 and KS3, but such liaison is a desperately weak argument for feeder school status, when there is already effective collaboration between MATs in the area on the annual transition of pupils.

The weakness of this point is emphasised when it is the only argument presented. In its response to the consultation, the Nexus Education Schools Trust pointed out that the Key Stage 2 framework is set out clearly by the 2014 Primary National Curriculum. "Therefore the rationale for change is not credible." The Chancery Education Trust point out that "the 10 admission code and schools' adjudicator is clear that there needs to be an educational benefit for the changes. The documentation and evidence does not support a clear impact". 11

3.2.2 Putting non-Trust primary pupils at a disadvantage The NEST response also points out that if the benefits of such collaboration were marked enough to provide a clear advantage to feeder school pupils, then the unfortunate corollary is that the children who join from a non-feeder school will be disadvantaged.

Either the Trust are content with the creation of a 'two tier' system within its secondary schools, or it privately believes that the difference will be negligible... in which case, the argument for feeder schools falls away.

3.2.3 No clear benefits In any case, the benefits of 'all-through' education appear unclear. The consultation document speaks of the Trust's "vision and desire to offer all-through education from 5 to 18" and yet, at the time of writing, it's website carries no further mention of the concept, let alone what it means, or its evidence base. This suggests that the central benefit of 'all-through' education is that it provides a convenient justification for a feeder school policy, rather than the other way round.

3.3 Has the decision already been made?

3.3.1 The circumstances of the consultation The consultation document states that "[the] Board of Trustees would stress that no decision has yet been made, and no 'preferred option' has been identified." This point was restated by Trust CEO Mr Budden to Bob Stewart MP. 12

10 NEST consultation response, 19 December 2019 11 Chancery Education Trust consultation response, 8 January 2020 12 Communication to constituents from Bob Stewart MP, 20 December 2019

This is a welcome affirmation of the only legally allowed position. However, the conduct of the Trust in managing the consultation process suggests that the Trust does favour change, over the status quo.

First, the weak and contradictory argument for why the Trust's schools should become feeders (see 3.2 above) reads as a list of reasons that someone has come up with simply to justify an a priori conclusion.

Second, the Trust and CEO do not appear to have consulted informally with, or give any advance notice to, the headteachers and CEOs of the neighbouring MATs (Chancery, Compass and NEST). If LPLT was genuinely neutral about the decision, or if the Trustees and CEO genuinely had no appreciation of how controversial these proposals might be, they would have discussed their ideas with the leadership of neighbouring Trusts.

Third, the decision to consult over the Christmas holidays has angered many people. The Trust is required to consult during the winter months, but could have chosen to launch the consultation in October, or chosen to consult for a longer period. The chosen timing inhibits responses, and this would have been known by the Trust.

Taken together, these actions by the Trust do nothing to inspire collegiality or trust. They suggest that it is seeking to avoid unwelcome opinions on an internally settled matter, rather than seeking fresh input into a decision that could still go either way.

It is possible that the Trust did simply not consider these factors when it set the dates for its consultation. This would be a curious lapse for an organisation that otherwise has a strong reputation for competence. Either way, the particular circumstances surrounding the consultation launch are regrettable.

3.3.2 Promises to Langley Park Primary school parents There have been discussions on social media alleging that a former head-teacher at Langley Park Primary School gave undertakings to some prospective parents, to the effect that the school would gain 'feeder' status in the coming years. There have been further suggestions that some of these parents have subsequently launched a legal action in order to force the Trust to follow through on this commitment.

The Trust have so far neither confirmed nor denied whether such promises were made, and whether any such legal action is ongoing, despite direct approaches for a simple 'yes' or 'no' answer.

If such promises were made, and/or if a legal action is underway, then this profoundly colours the consultation. The failure to acknowledge this in the consultation document, or in the subsequent FAQs published by the Trust, would be an egregious omission.

3.3.3 No financial projections or impact study A Freedom of Information request submitted on 19 December 2019 requested, inter alia “Feasibility studies, impact assessments, admissions analyses, and/or other papers written during the decision-making process. ” The response from the Trust on 22 January 2020 revealed that no such analyses have been made. This is surprising, and suggests that the decision has been prejudged, and/or will be made for reasons unrelated to those permitted by the Admissions Code.

3.3.4 Shifting the ‘Overton window’ on the Langley Park Primary School option. The ‘Overton Window’ is a political concept relating to the discussion of controversial matters. Savvy politicians and civil servants may, at times, propose an extreme policy as a way of shifting the bounds of acceptable discourse. Even though the proposed idea is not adopted, it nevertheless places less extreme versions of the policy on the table for discussion.

Whether by design or by accident, the Trust’s consultation is an example of the concept in practice. By proposing a broad feeder-school admissions policy that can reasonably be expected to cause consternation within the community, the Langley Park Primary School option appears (to some) to be moderate by comparison. If and when the Trust takes the decision to make only the (currently undersubscribed) Langley Park Primary School a feeder to the secondary schools, this will be seen as a partial ‘win’ for campaigners and a compromise by the Trust. The community might then reluctantly accept the policy.

But in doing so, the Overton Window will have shifted, and the principle of feeder-schools will have become accepted. More importantly, it is also a highly manipulative tactic that should have no place in public policy decision-making, and would be grounds to challenge any decision made, especially if there are any truth to the rumours set out at 3.3.2, above.

4. Opposition to the policy

4.1 Public campaign There is significant opposition to the proposed admissions policy from within the local community. Three thousand people signed the petition in just six days (current figure is 13 circa 3,500). In 24 hours 200 parents from eight primary schools signed a letter to Bob Stewart MP and the Bromley Councillors. A protest at the Langley Park Schools campus attracted around 400 people. 14

4.2 Hawes Down parents Despite the fact that the policy changes would give them additional choices when selecting a secondary school for their children, many parents of children at Hawes Down school have opposed any change. A communication between parents circulated in December noted that the secondary schools are state funded and everyone should have equitable access; that the change would affect collaboration with other schools; the damage to the environment; and that the benefits of a change are questionable.

Hawes Down parents have also expressed concern that if Option A (LPP only) were to proceed, then their school and Clare House would be disadvantaged within the Trust.

4.3 Neighboring Multi-Academy Trusts

4.3.1 Chancery The Chancery Education Trust includes Pickhurst Academy. It is opposed to any changes to the Trust’s admissions policy, stating:

The change will set the precedent for other Multi-Academy Trusts within Bromley, which include both primary and secondary schools to alter their criteria. This will result in reduced choices for pupils who attend Bromley Primary Schools that are not part of a primary/secondary Multi-Academy Trust ... As a publicly funded body all families within the area should have equal access and not be disadvantaged by not attending a Langley Park Learning Trust primary ... The admission code and schools’ adjudicator is clear that there needs to be an educational benefit for the changes. The documentation and evidence does not support a clear impact on the educational benefits for naming feeder primaries 15

13 <https://www.change.org/p/langley-park-learning-trust-stop-proposed-changes-to-langley-park-secondary-schools-admissions-criteria> 14 <https://www.newshopper.co.uk/news/18142314.hundreds-parents-protest-proposed-changes-admission-process-langley-park-schools/> 15 Chancery Education Trust consultation response, 8 January 2020

4.3.2 Compass The Compass Academies Trust includes Oak Lodge Primary School, Marian Vian Primary School, Unicorn Primary School and Wickham Common Primary School. It is opposed to any changes to the Trust's admissions policies, stating:

We object on the grounds this will have a detrimental impact on the choice families may have when applying for a secondary school place as enshrined in the admission code. If agreed, it will set a precedent for other secondary schools who are part of mixed school phase trusts to add their primary schools to secondary admission criteria; giving even less choice for Compass Academy Trust Families.
16

4.3.3 Impact The Impact Multi-Academy Trust operates Hayes and Ravens Wood secondary schools. The directors have confirmed that they have responded to the consultation "to raise concerns." 17

4.3.4 NEST The Nexus Education Schools Trust (NEST) includes Blagowan Primary School, Highfield Junior School, Highfield Infant School and Pickhurst Infant Academy. The Trust has responded to the consultation, and "strongly opposed" the changes to the policy. The response explained that the rationale for the change was "not credible" and "against the spirit of the admissions code." 18 4.4

The London Borough of Bromley In a response written by Jared Nehra, Director of Education, the London Borough of Bromley (LBB) also expressed strong opposition to the plans. Mr Nehra said that the feeder school proposal "creates significant risk of instances occurring where applicants would not be eligible for a place at any local school." The response also stated that if the feeder-school policy is introduced, the borough would appeal to the School Admissions Adjudicator.

4.5 Local politicians

4.5.1 Bob Stewart MP In a letter to campaigners on 20 December 2019, Bob Stewart MP said that he was opposed to the proposals. He said that the status quo was appeared to be "the fairest approach" to admissions. "To me, distance from home to school is a straightforward criteria; anything else would start all sorts of complications." In a previous letter to campaigners he also said that the proposals "make little sense."

16 Letter to parents, 8 January 2020 17 Email, 24 January 2020 18 NEST consultation response, 19 December 2019

4.5.2 Local Councillors Cllr Nicholas Bennet, Mayor of Bromley; Cllr Peter Fortune, Executive Portfolio Holder for Education, Children and Families; and Cllr Christine Harris, a former Governor of LPSB, have all stated their opposition to the Trust's proposals. They support the London Borough 19 of Bromley's submission that the change to admissions criteria would have a detrimental impact on admissions across the borough.

4.6 NASUWT The NASUWT have responded to the consultation, opposing any changes. In its response, the union noted that its policy had been developed in consultation with its members among the teaching staff at LPLT schools. It said that "the supporting argument for this change that these 'feeder schools' will be better able to solve the problems that some pupils experience on transitioning from primary to secondary school is simply a non sequitur" and suggested that the Trust was "trying to 'look after' its own primary schools in the face of falling school rolls." It called this strategy "protectionist" and expressed concern that it would lead to "egregious competition" between schools. 20 4.7 Park

Langley Residents Association The proposals were discussed by the Park Langley Residents Association on 19 December 2019. The committee resolved to object to the proposed changes, stating that "the children of Park Langley could well be disadvantaged for secondary education at both the Langley Park Schools" and cause an increase in traffic. 21 4.8 Cleaner, Greener Bromley (and Beyond) The local

environmentalist group Cleaner, Greener Bromley (and Beyond) have also responded to the consultation, opposing any changes on environmentalist grounds. In their consultation response, they say that the new policy would "inevitably result in more car usage" and that "the issue of increased pollution, and related increase in carbon footprint, does not appear to have been addressed or offset/mitigated against in the proposal." 22

The group also noted the Trust's previous commitment to reducing pollution and increasing road safety, through reducing car use, most recently in a letter to the parents of children at LPSB on 9th January 2020, and the banner displayed prominently outside the school citing every child's right to health and a clean environment.

19 Correspondence with campaigners 20 Quotes drawn from NASUWT consultation response, 21 January 2020 21 Email to residents, 29 December 2020 22 Cleaner, Greener Bromley (and Beyond) consultation response, 13 January 2020