

'Higher Standards, Better Schools for All: More choice for parents and pupils'

Department for Education and Skills

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The Audit Commission's response

Detailed response

- 1 The Audit Commission's response to the White Paper focuses on three aspects:
 - arrangements for admissions to schools;
 - choice, the management of surplus places and falling rolls; and
 - capacity, accountability and the balance of responsibilities between councils, parents and autonomous schools.
- 2 The Commission's response draws upon our audit, inspection and studies experience of governance, access and value for money in education.

Admissions

- 3 The White Paper emphasises the need for all children to be able to access high quality education. It makes an interesting although un-costed (both in terms of provision and administration) proposal relating to school transport to improve access to secondary schools. The White Paper also introduces the notion of banding to secure balanced intakes for schools. Such a quota device introduces a potential tension: it seeks to make choice more widely available through restricting options for children who live within traditional school catchment areas. Inevitably, one parent's ability to exercise choice potentially denies another's and highlights the need not to foster unachievable expectations.
- 4 The White Paper makes reference to the role of councils in championing the interests of parents. However, it does not make sufficient provision to match the increases it seeks to promote in school autonomy with the checks and balances necessary to secure equity of access and treatment of parents and children. Although the White Paper rightly requires new schools to demonstrate compliance with the Code of Practice for admissions, it does not address the existing limitations of the Code and the role of councils.
- 5 In our recent response to the consultation on the Code of Practice (which is reproduced in the appendix) we highlighted the need for the Code to be made binding and for councils to be given a responsibility for tracking the implementation of admissions and appeals arrangements throughout the school year. We have reservations about the consequences of schools making autonomous and unchecked decisions about admissions arrangements. Such decisions are more likely to work against the interests of the most disadvantaged, least mobile and worst informed parents and children.
- 6 The White Paper rightly highlights the importance of better information. The proposal for dedicated choice advisers goes some way to meet the Commission's

recommendation for an advocacy service. Additionally, the proposals for tightening of requirements on schools to inform the local authority of children leaving their school rolls are welcome. However, these measures fall significantly short of the action the Commission feels is necessary in order to challenge autonomous schools to secure both accountability and the protection of the entitlements.

Choice, the management of surplus places and falling rolls

- 7 The White Paper emphasises the need to widen choice in order to enable access to good schools and to drive up standards. In many parts of the country, choice is neither realistic nor an issue of primary importance to parents. The Audit Commission is a strong advocate of the need for all providers of public services, including schools, to have a heightened awareness of and responsiveness to the needs of service users.
- 8 The expectations of users should be realistically managed and grounded in provision which is affordable and does not result in poor value for money. There needs to be a managed balance between the supply of and demand for school places. The promotion of wider choice overstates both what is necessary or feasible for all. The retention of the concept of parental preference, although often misinterpreted as choice, is more sensible, defensible and realistic.
- 9 The White Paper assumes that spare capacity in schools results from unpopularity and poor performance. It advocates that councils should move swiftly to close schools that are failing to attract pupils. The Audit Commission has consistently emphasised the need to challenge the retention of inefficient surplus places¹. The DfES has commissioned the Audit Commission to provide guidance to councils on managing primary school places. The consequence of effective management of school places, in order to strike a balance between supply and demand, inevitably impacts on the scope of available choice. Students are displaced from some schools and take up places elsewhere. There needs to be a balance between the ability to respond to the exercise of choice and the ability to meet the cost of maintaining the capacity with which to respond. The argument that poorly performing schools should be closed where there are opportunities elsewhere is a strong one. However, there are important considerations that need to be taken into account about the place of a school within a community and the consequences in the short to medium term of children who will be affected by the disruption of closure or reorganisation.
- 10 The White Paper does not address the situation over the next ten years, where surplus capacity will more frequently be a result of demographic trends rather than unpopularity. In *Trading Places* we reported that 'high levels of unfilled places represent a substantial waste ... tying up resources that could be used to improve the quality of education'. There is a continuing need for active management of school places by councils in order to make the best use of the substantial increases in revenue and capital resources which have been targeted at schools and education.

¹ Trading Places (Audit Commission), 1996, 2002

- 11 In 2004 there were nearly half a million surplus places in the primary sector. This represented over 11 per cent of the total capacity. Councils' own forecasts project a further fall in rolls of 13,000 by 2008 — 3 per cent of the current pupil population. Unless action is taken, two thirds of council areas will have over 10 per cent surplus places by 2008. 10 per cent is the benchmark recommended in the past by the Audit Commission.
- 12 The number of secondary school pupils, which has been increasing until recently, is now set to decline: a result of the reduced number of pupils transferring from primary schools. In 2004, there were around 22,000 surplus places in the secondary sector. This represented just over 6 per cent of capacity. If no action is taken (including the creation of more places at successful schools and the expansion of sixth forms), by 2011 more than a third of council areas will have greater than 10 per cent surplus places.
- 13 We understand that the School Organisation Committee is to be abolished in order to remove a bureaucratic layer. However, the proposed abolition removes a potential line of accountability and a source of challenge. In the absence of this body we believe councils, communities and governments would benefit from the government acknowledging explicit advisory levels of acceptable surplus places within a council or sub-regional area. There will of course be regional and local differences but the Audit Commission's view is that the previous benchmarks of 10 per cent of places in aggregate and 25 per cent in individual schools should be reinforced.
- 14 On the pattern of school provision envisaged in the White Paper: there does appear to be an inconsistency in the exercise of choice by schools themselves. For example, the exercise of flexibility over the delivery of the national curriculum seems to be confined to trusts and academies. It also does not seem consistent that new schools cannot choose to be community schools.
- 15 It is appropriate and welcome that schools should have a duty to promote community cohesion and good race relations. This is potentially a very sensitive area where promoters of schools have an explicit faith dimension. It will be essential that strong safeguards are in place to prevent the entry of inappropriate Trusts.

Capacity, accountability and the balance of responsibilities between councils, parents and autonomous schools

- 16 The White Paper claims a new role for local authorities, but the analysis and detail of the role is limited and should be defined more clearly. There should also be a more comprehensive assessment of capacity. Local authorities are 'to be given a new statutory duty to promote choice, diversity and fair access, to underpin this role as commissioner and champion of pupils and parents', but insufficient acknowledgment is given to their current roles and the gaps of accountability.
- 17 The White Paper aims to strengthen or put in place mechanisms to support parents and children (for example, by enhancing the role of the Schools Adjudicator and by enabling parents to refer complaints to Ofsted). However, the White Paper fails in a number of respects to utilise councils (as accessible and

locally accountable, elected authorities) to address issues of challenge and concern more directly.

- 18 The White Paper promotes councils as commissioners of services and champions of parents and pupils. However, the White Paper misses a major opportunity to secure necessary and better local coherence and challenge. The Audit Commission has expressed concerns about the advisory nature of the admissions Code of Practice; our study on education funding^I revealed the lack of both clarity of role and of capacity and knowledge at council level to provide the necessary monitoring and challenge to schools. A recent public interest report^{II} further highlighted the absence of effective access and challenge at a local level to provide the necessary check and balance to enhanced school autonomy.
- 19 The consequence of the current ambiguous configuration and definition of responsibilities and roles is weak accountability and uncertain value for money. In *Held in Trust*^{III} the Audit Commission confirmed that 'despite concerns about the bureaucratic burden, the real cost of strategic management in LEAs is modest'. The report also emphasised that 'schools are not self sufficient institutions and require skills from other sources'. Our recent studies and audit findings confirm the need to complement the skills and expertise held by schools and to ensure that clear lines of accountability are maintained. Our funding study found that, if anything, councils are too modestly resourced in order to carry out their functions. Schools overall continue to value the strategic oversight and leadership of their councils. The school survey^{IV} results, which reflect the responses of around 40 per cent of schools each year, record a continuing upward assessment of the role and contribution of councils. LEA and children's services inspections endorse this overall trend.
- 20 In this context, the addition of Ofsted to the local complaints landscape (removing any locus from the local council), and the new role for Ofsted in investigating parents' concerns, calling meetings with parents to discuss their complaints and, if necessary, undertaking immediate inspection, seems a recipe for complaint escalation, a confusion of role, and a serious strain on capacity. A similar, potentially unrealistic aspect of the White Paper relates to the proposed legislation to assign the responsibility to parents of excluded pupils for the first five days of the exclusion period. Given the profile of excluded pupils, this raises key issues of practicability and enforcement – and the role of the local council.

^I Education Funding (Audit Commission), 2004

^{II} Whalley Range High School – Public Interest Report 2005

^{III} Held in Trust (Audit Commission) 1999

^{IV} Annual Schools Perception Survey (Audit Commission)

Appendix: Audit Commission response to School Admissions Code of Practice - October 2005

Summary

- This paper examines how well the current admissions arrangements are working for parents and children. It is the Audit Commission's response to the Department for Education and Skills consultation on the 2005 draft School Admissions Code of Practice.
- Audit Commission research has found that, while current guidance has undoubtedly contributed to improvements in admissions and appeals practice, poor practice still persists in some areas. Many arrangements are very good; but the contrast between the good and the weak highlight the inadequacy of the current framework.
- We have found that the current Code has failed to eliminate poor practices in some areas. Councils' coordination responsibilities, which are designed to secure greater equity and consistency, are too limited. From the perspective of parents and children the admissions system is frequently confusing. It operates differently within and across council areas. Success for some parents, children and young people in school admission and appeals still continues to rely too much on their persistence and self advocacy, their geographical good fortune and the time of the year when they are seeking admission.
- Consequently, although all parents are able to express preferences for a school place, how meaningful these preferences are and how they are treated thereafter varies. Yet the proposed draft Code does not take any significant steps to address these inadequacies.
- The paper concludes by setting out ten key recommendations for improving the current arrangements for school admissions and appeals in England. Top of the list is a need to make the Code's provisions mandatory.

Detailed response

Introduction

- 21 This report forms the Audit Commission response to the Department for Education and Skills consultation on the school admissions draft Code of Practice. It draws upon a study of 12 council areas during summer 2005 as well as recent relevant Audit Commission inspection and performance audit work. It comments on, and makes recommendations for improving the current arrangements for school admissions and appeals.

Background

- 22 Parents' right to express a preference for a school place was set out in the 1944 Education Act. Local authorities had a responsibility to take these preferences into account in the allocation of school places. Parents were given a right of appeal against non-admission in 1980. Admissions responsibilities rested at that time mainly with councils. Exceptions were admissions to church schools where adherence to the faith was the first admission criterion.
- 23 Open enrolment, extending choice beyond council boundaries, was introduced in 1988. Additionally, grant-maintained schools were introduced and, like voluntary aided church schools, they were permitted to manage their own admission arrangements which did not need to be in line with councils'. These developments introduced new complexities for parents in the exercise of their right to make preferences.
- 24 The 1998 School Standards and Framework Act required the Secretary of State to publish a Code of Practice on school admissions. This was introduced in 1999. It made some provisions to allow parents access to independent appeals panels; reduced the capacity of most schools to select through interview and created the Office of the Schools Adjudicator to resolve local disputes.
- 25 Government policy since 1997 has been to encourage greater diversity in the governance, ethos and specialisms available within secondary schools in particular. This inevitably has had an impact on both the expression of preferences (or choice as it is assumed by many) and parental expectations.
- 26 The 2002 Education Act introduced a requirement for councils to coordinate admissions within and across their boundaries and a requirement for each council to set up an admissions forum. As a result councils are required to put in place arrangements whereby parents in an area are able to express all their preferences on a single form rather than have to manage a system which generated multiple offers for some, and none for others.
- 27 The 2003 Code of Practice consolidated previous law and guidance on what the government saw as good practice and poor practice. The Code's stated intention was to secure more coordination and cooperation between admission authoritiesⁱ to produce admission systems that parents will find simpler and more streamlined, and a better deal for all. However, the Code remained advisory rather than mandatory.
- 28 In its report on secondary admissions in 2004, the Education and Skills Committeeⁱⁱ considered that a system based on guidance rather than regulation meant the government could have no assurance that its objectives of securing greater fairness would be widely met. It concluded that 'Fairness in public policy should not be a matter of luck but a matter of course'.
- 29 The draft 2005 Code seeks to respond to the Education and Skills Select Committee's report by offering clearer guidance on good practice and poor

ⁱ Admissions authorities include councils, foundation schools and academies

ⁱⁱ Education and Skills Committee, Secondary Education: School Admissions, fourth report of the 2003-04 session, July 2004

practice in oversubscription criteria and managing preferences. It emphasises the need to prioritise admissions of 'looked after' children and approaches to accommodate hard to place children. It is still advisory.

How are arrangements for admissions working for parents and young children

30 This section sets out our findings on how well the current admission arrangements are working in the following areas:

- council coordination;
- expressions of preferences;
- parental involvement and feedback;
- scrutiny by Admission Forums;
- use of admissions criteria;
- waiting lists;
- casual admissions;
- for children looked after by the authority;
- for hard to place pupils;
- monitoring; and
- management of appeals.

Council Coordination

- 31** Under the current Code, councils are obliged to coordinate admissions to secondary schools in their area from September 2005. For primary schools, this will operate from September 2006. This is intended to simplify the previous very complicated arrangements where parents potentially needed to make multiple applications to different admissions authorities particularly, but not exclusively, at the secondary transfer stage. Most of the councils in our recent study of admission arrangements have made good progress this year. Before the introduction of the new Code, many had already negotiated coordination arrangements with other local admissions authorities.
- 32** The requirement to secure coordination has enabled councils to improve the consistency of their processes and to meet the agreed timescales. Most, but not all, of the councils in our study met the requirement to inform parents of the allocation by a given date (1 March 2005). The need to coordinate existing arrangements, such as school open evenings, often represented a considerable challenge to councils, as did the incorporation of selection tests where these were required by admissions authorities. Nevertheless councils demonstrated the ability to deliver on this complex and difficult task.
- 33** However the arrangements and processes beyond the offer of a place are less secure, often uneven and are unclear for parents and young people.

- 34 There is no specified date, timetable or clear process for the conclusion of the council's coordination responsibilities. Councils effectively hand back the management of the admissions process to individual admissions authorities at different times. Coordination may in reality end immediately after the allocation date. Admissions authorities are not required to continue to exchange information, and, as a result, councils are not well placed to maintain up-to-date information on whether or not children have places for September. Once the management of the process is handed back to schools, there is no guarantee that parents will be treated consistently by the different admissions authorities. We know that the quality of the information provided to parents varies and in some cases this will mean that parents are unclear about what to expect next.
- 35 We recommend that councils have a clear responsibility to coordinate the full annual round of admission arrangements and throughout the school year councils should be required to track and receive information from other admissions authorities about admissions, the conduct and outcome of appeals.

Expressions of Preferences

- 36 There are distinctly different practices between council areas for how parents may express their preferences. The requirement to secure coordination within a council area does not extend to ensuring equitable arrangements between areas, and the draft Code is proposing no change to this. There are two significant areas of variation. The first relates to the number of preferences which can be expressed; the second to how those preferences are ranked.
- 37 How many preferences can be made is critically important to parents and children. Parents have a reasonable expectation that borough and council boundaries should not result in different treatment. But, because of the advisory nature of the Code, this can be the case. For instance, regulations allow for parents to express up to six preferences. Where parents have limited access to schools other than their local schools it may be unrealistic to require more than three preferences; but equally it is inappropriate to restrict the number of preferences. Nevertheless this is a feature of practices between neighbouring council areas that is causing concern. In metropolitan areas, in particular, where parents and young people can readily access schools in neighbouring authorities, this is unsatisfactory and lacks equity.
- 38 Similar postcode differences apply where councils and admission authorities have different approaches for weighting preferences. The current Code provides for two preference systems - 'first preference first' and 'equal preference'.
- 39 In a 'first preference first' arrangement, priority will be given to those preferences which put a particular school higher in the ranking. In the 'equal preference' setting all preferences have an equal weight and oversubscription will be determined by other selection criteria. Both systems have advantages and disadvantages. However the presence of both systems within a council area and in adjacent areas is confusing for parents and young people, and serves the interests of admissions authorities not parents. Our research findings amply

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confirm that, despite advice within the Code to the contrary, parents and young people have to deal with mixed systems.

- 40 We recommend that there should be national consistency in the maximum number of preferences that parents are able to express and in the management and definition of criteria.
- 41 We also recommend that all admission authorities should be required to operate the same preference system.

Parental Involvement and Feedback

- 42 Councils' practices to ensure that all parents and schools are aware of recent changes to admissions process and timetables have been good. Disappointingly, however, not all are actively seeking detailed feedback from parents about their experiences and as a result adjustments to arrangements will mainly be informed by the councils' perspectives. While there is some good practice and there is recognition of the importance of feedback in order to target improvements to meet individual and group needs, many councils continue to be conservative in their approaches. Some assert that satisfaction will be dependent on whether or not parents are successful with their preference. This may be true to a degree but these councils are failing to track the accessibility and appropriateness of what takes place during the process.
- 43 We believe that parents and carers should be offered the opportunity to feedback on the process and that their views and experiences should be used to improve practice.

Scrutinising Admissions Proposals

- 44 Some Admissions Forums have overseen the consultations processes where admissions authorities are proposing changes to criteria or practices. In some cases they have proved effective in challenging poor practice, but this is not common.
- 45 The number of admissions authorities involved within a council area (some may deal with over 100 different admissions authorities), coupled with the discretion conferred by an advisory Code, constrains effective scrutiny of proposals. As a result poor practice continues to go unchallenged. Sometimes this reflects the capacity of the council. A significant factor also is the tightness of the timetable which becomes more critical in complex settings. In these cases the prescribed timelines do not allow sufficient time for councils and their admission forums to scrutinise arrangements as thoroughly as they should.
- 46 We recommend that a duty should be placed on councils and admission forums to ensure that all admissions authorities' admissions and appeals procedures conform to common and consistent practices, and that proposed changes to existing practices should be lodged with councils and admission forums at least six weeks before they need to be determined.

Admissions Criteria

- 47 The draft Code includes guidance on appropriate admissions criteria and its interpretation; but in our experience implementation is variable. For example, the term 'siblings' in some settings is restricted to those who still attend a school, but elsewhere the criterion can extend to siblings who had previously attended a school. Social and medical criteria are frequently ill defined, and as a result parents are unsure about what information they need to provide to demonstrate that the circumstance of their child meets the set criteria. Annual reports of the School Adjudicator show an increase in challenges by councils themselves to such criteria. But many see this route as unhelpful in maintaining good relations with schools who manage their own admissions. As a result, ambiguous and uneven practices go unchallenged.
- 48 Failure by a council to refer continuing poor practice to the Adjudicator disenfranchises individual parents who do not have the right themselves to challenge existing criteria through this route.

Waiting Lists

- 49 The Code provides guidance on the use of waiting lists, but practice on the use of waiting lists varies. Admission authorities work differently and as a result the processes may be unclear to parents. Authorities themselves are often unclear about when to reprioritise or cease to maintain these lists. Some are reluctant because parents have an expectation that once on the list they will progress to the top over time. Others are reluctant to prioritise vulnerable children, or those just moving into the area. Parents between and within areas are confronted by differential practice which adds to the admissions maze.

Casual Admissions

- 50 Casual admissions involve parents of children seeking admissions to schools outside the usual admissions timetable. These are usually children moving into or moving within the area during the year. Many councils concede that they have not yet tackled this issue satisfactorily.
- 51 The Code offers advice on the management of casual admissions but the council is assigned no responsibility for coordination. The nature of coordination for casual admissions would be different to the normal annual allocation process: it would focus more on the individual child and identifying a suitable vacancy. However the absence of a prescribed role means that intelligence about children in the system is partial, tracking is incomplete and the risk of children going missing from the system increases. As a result there is no systematic support given to parents and children, or protection from inequitable and unfair practices. These potentially deny parents their entitlements, for instance the right of appeal or treating children already on a waiting list more preferentially than a later arrival who meets a higher criterion. Consequently children may not be placed in the most suitable schools as quickly as they should be.

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- 52 Because councils have no duty to coordinate casual admissions, they may well be unable to give parents up to date information on whether schools in their area have vacancies in different year groups. Councils often are reluctant to request regular updates from schools because they do not want to be seen to be increasing the bureaucratic burden on schools. But, as a result the burden of responsibility is shifted to parents.
- 53 Coupled with councils' partial responsibility for coordinating annual admissions, it is not possible to gain an accurate picture of how well children, young people and families are being served by admissions authorities. Neither can councils nor others identify clearly any trends, either positive or negative, both across the area or at individual schools.
- 54 We take the view that councils should be the first contact point for parents and carers of children and young people seeking admission outside the normal admission round. They should manage the process for each individual child/young person with other admissions authorities.

Looked After Children

- 55 Good progress has been made by Admissions Forums in negotiating and agreeing with admissions authorities that looked after children should be prioritised within admissions criteria. But implementation remains a difficult area for councils to enforce.
- 56 Particular difficulties have been encountered with faith schools reluctant to admit looked after children other than those who are demonstrably of that faith. There is currently no guidance on what constitutes sufficient evidence for the child's/ young person's faith. This fails to accommodate the frequently unsettled life history of children in this group.
- 57 Similarly a number of councils encounter resistance from neighbouring admissions authorities areas who seek to give higher priority to their own area's looked after children. The absence of co-ordination and enforcement responsibilities makes it difficult to secure fair treatment of looked after children involved in mid-year transfers.
- 58 We recommend that councils should be required to ensure that locally agreed protocols in relation to looked after children are implemented.

Hard to Place Pupils

- 59 The Code requires councils to have protocols for securing admissions for children who are vulnerable or hard to place by September 2005. Although many have made progress in adopting protocols, councils frequently lack the confidence that they will overcome difficulties in implementing them. Schools continue in many instances to resist admitting pupils covered by the protocols, even where the council has directed them to do so.

- 60 The protocols are intended to ensure that all schools within an area accept a proportion of hard to place pupils and specify how they will be allocated to achieve this. However, as with casual admissions, councils encounter schools reporting no vacancies in the appropriate year group and because councils do not track and receive information from schools about admissions and appeals they have only a limited basis to challenge these reports.
- 61 We recommend that councils should be required to ensure that locally agreed protocols in relation to children who are hard to place are implemented.

Monitoring of Arrangements

- 62 The advisory nature of many aspects of the Code of Practice means that councils' ability to monitor performance in managing admissions, and in using data to improve the information available to parents, is constrained. There are no provisions in the Code to ensure that the performance of admissions authorities is monitored. Instead, processes exist to manage concerns on an exceptions basis. As we have explained, councils will often tolerate certain arrangements because they are seeking to maintain relationships with admission authorities; elsewhere they have no access to information that might enable them to challenge poor practices. As a result underperformance is not necessarily identified or effectively challenged.

Management of Appeals

- 63 Parents' right to appeal against the allocation of a school place is treated significantly differently in different parts of the country. There is too much variation in the accessibility of local arrangements, resulting in inequality of opportunity and disadvantage for less assertive and persistent parents. Some councils automatically included information about the appeals process with allocation letters. Others advise parents and carers that they have a right to appeal and give a contact name and number. A third approach was simply to provide a contact number if parents were unhappy about their allocation.
- 64 Arrangements for appeals against mid-year decisions are less secure. As with admissions arrangements there is no provision for coordinated tracking and monitoring of the conduct of appeals by other admissions authorities. This is a serious absence of a safeguard for parents and young people. Frequently there is no managed up to date intelligence about outcome of appeals, either by schools or neighbouring authorities. As a result councils are unable to provide advocacy on behalf of parents and young people. The Code of Practice on Appeals does provide guidance on how parents can be helped in assessing the possible success of an appeal by having information included in admissions booklets. However this is not frequently done.
- 65 Admissions and appeals are critical universal services for all children, young people, and their parents and carers. In many instances, they are not being well served.

- 66 It is recommended that the result of all decisions by admission appeal panels should be reported to the child's/young person's home council and that councils should be required to provide advocacy services to assist parents, children and young people access admissions and appeals arrangements

Conclusions

- 67 The Audit Commission's review of the current admission arrangements has highlighted gaps in councils' coordination responsibilities; inconsistency in the treatment of parental preferences, admissions criteria and the information provided to parents; and weaknesses in the arrangements for scrutiny and monitoring, that the proposed new Code will not address.
- 68 We therefore recommend the following changes to the current proposals:
- The status of the Code should be altered from an advisory code to a mandatory code that councils and admission authorities are obliged to adhere to;
 - Councils should be given clear responsibility to co-ordinate the full annual round of admissions and appeals arrangements;
 - Throughout the school year councils should be required to track and receive information from other admissions authorities about admissions and the conduct and outcomes of appeals;
 - There should be national consistency in the maximum number of preferences able to be expressed by parents and in the management and definition of criteria;
 - All admission authorities should be required to operate the same preference system;
 - A duty should be placed on councils and admission forums to ensure that all admissions authorities' admissions and appeals procedures conform to common and consistent practices, and that proposed changes to existing practices should be lodged with councils and admission forums at least six weeks before they need to be determined;
 - Councils should be the first point of contact for parents and carers of children and young people seeking admission outside the normal admission round, they should manage the process for each individual child/young person with other admissions authorities;
 - Councils should be required to ensure that locally agreed protocols in relation to looked after children and children who are hard to place in schools are implemented properly;
 - The result of all decisions by admission appeal panels should be reported to the child's/young person's home council; and
 - Councils should be required to provide advocacy services to assist parents, children and young people access admissions and appeals arrangements.