

**Consultation on the proposal to redesignate Corbets Tey  
as a Special School for pupils with Severe Learning  
Difficulty (SLD) and Speech, Language and  
Communication Needs (SLCN)**

**CONSULTATION FEEDBACK REPORT  
MARCH 2018**

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## Section 1: Introduction and Executive Summary

Havering’s vision for children and young people with special educational needs and disabilities (SEND), and other additional needs, is to enjoy their education in the most inclusive environment possible and be supported in participating as fully as they can in the lives of their schools and local community, throughout childhood and into adulthood.

The Council’s High Needs Strategy 2017-2022, sets out ambitious and realistic objectives to ensure Havering’s provision is the first choice for families with children and young people with high needs. We will do this by developing new provision as well as improving existing facilities and by helping our special schools to support pupils who have more complex levels of need.

In order to achieve this, we will need to create capacity in our special schools by reducing the number of places for those with moderate levels of need, who in turn can be better supported with appropriate provision in mainstream schools. Following the High Needs Review, it was agreed to consult on a proposal to redesignate Corbets Tey as a school for pupils with Severe Learning Difficulties (SLD) and complex Speech, Language and Communication Needs (SLCN).

The purpose of this report is to present a summary of the key responses received during the pre-statutory consultation process of the proposal, including the main views gathered from both the online survey and the consultation

## Section 2: The Consultation Process

The consultation process covered by this report ran from 19 February to 19 March 2018. The objective was to inform and gather views regarding the proposal from key stakeholders, particularly parents/carers of pupils and staff in Havering schools who have a statement or an EHC plan, school governing bodies and other interested parties or groups within the borough.

This formal pre-statutory consultation is the start of a four stage process in our decision-making timeline to determine whether the proposal would be implemented.

Pre-Statutory Consultation period	19 February – 19 March 2018
NKD report on Statutory Notices and Proposals publication	March 2018
<b>Statutory Stage 1</b> – Publication of Statutory Notices	May 2018
<b>Statutory Stage 2</b> – Representation Period	4weeks
<b>Statutory Stage 3</b> - Decision on proposals by the Local Authority	June/July 2018
<b>Statutory Stage 4</b> - Implementation	From September 2018

A four week ‘representation’ period will be a final chance to express views on the proposal, if the LA decides to publish a statutory notice. If the proposal is then approved the decision will be implemented from September 2018.

190 hard copies of the consultation document with the questionnaire were sent to all to parents/carers & staff of Corbets Tey School.

Other consultees' as listed in *appendix A* were sent an electronic version of the document and the feedback questionnaire via an email. The survey monkey link was circulated widely to enable all other stakeholders' access the consultation document and give their feedback online.

A public notice of the consultation exercise was also posted on the London Borough of Havering website and all were encouraged to respond by post or via the online survey monkey. A hard copy of the document however was available on request for those who did not have access to a computer.

### Section 3: Questionnaire Response and Summary

This section of the report summarises the responses received from the consultation questionnaire. The questionnaire provided an opportunity to respond to a specific question as well as allowing for general comments.

In total, **42** responses were received. The respondents were categorised according to the role they defined on the questionnaire or email response as follows;

- **26** were from parents/carers
- **2** were local residents
- **3** were members of staff/teacher at Corbets Tey School
- **4** were governing body members of Corbets Tey School
- **1** from the School Senior Management Team
- **4** were governing body members at another school in the borough
- **2** Ward councillors

A breakdown of how the 42 responses were received is as shown in the table below;

Email Correspondence	Online survey Responses	Hardcopy questionnaire	Total
<b>2</b>	<b>29</b>	<b>11</b>	<b>42</b>

**Question 1** asked respondents to state whether they had a child or young person with a Statement or Education Health Care plan

Response Option	Total
<b>Yes</b>	<b>27</b>
<b>No</b>	<b>13</b>
<b>Blank</b>	<b>2</b>
<b>Total Responses</b>	<b>42</b>

**Question 2** asked respondents to state if they support the proposal for Corbets Tey School to be redesignated as a special school for pupils with Severe Learning Difficulties (SLD) and Speech, Language and Communication Needs (SLCN).

67% of respondents supported the proposal. 31% did not support the proposal while 2% either gave their support for or against the proposal.

The table gives a breakdown count and how the survey participants responded to question 2;

Respondent Category	In support of proposal	Against the proposal	Neither in support or against	Total
Parents/carers	16	10		26
Local residents	1	1		2
Member of staff/teacher at Corbets Tey	3			3
School Senior Management Team		1		1
Governing body member of Corbets Tey	3	1		4
Governing body member at another school in the borough	4			4
Ward Councillor	1		1	1
<b>Total</b>	<b>28</b>	<b>13</b>	<b>1</b>	<b>42</b>

**Question 3 gave a comment space for respondents to state their reason/s in support of the proposal.**

The extract below shows direct responses from consultees;

I have noted that Learning difficulties amongst children are becoming more complex and they must be catered for to allow children to achieve their greatest potential
The guidelines for admittance to the school must be made clear. I am aware of lots of parents with children with behaviour, not learning or speech/ communication problems trying to get into the school because mainstream schools cannot cope with them. This leaves those with children who do have severe learning and communication difficulties without a placement that caters to their needs.
This school does not offer the appropriate level of support for those young people with moderate learning difficulties as the mix of students has always been majority severe, and as a result, those with moderate difficulties, unfortunately, do not make sufficient progress. I believe this school has only ever concentrated their efforts on the severe learning disabled student and it therefore makes sense to redesignate the school as such.
My child has severe learning difficulties and requires extra SLCN support.
The re-designation will more accurately reflect the current school demographic, and the increasing trend towards higher demand for places from pupils with more complex learning needs. It is supported by the staff, the parents, and the school governors. It will allow the school to focus its strategy to support pupils with more complex needs.
Having been a Chair of Governors at Dycorts school for 10 years, finishing in 2014, I understand that the nature of children needing to attend Corbets Tey is changing. Many more children with additional needs now attend main stream schools which means those attending special schools are likely to have increased needs. I do not see the move from being a MDL to a SDL whilst retaining the keeping the communication specialty, significantly changes the nature of the school. I assume that current pupils will remain at the school and new pupils will be classified as having SDL plus communication needs.
It will meet the increasing demand for provision in this area and recognise the work the school is already doing,
It more accurately reflects the pupil population.
Because for many years now, MLD status for the school has been nonsense due to the number of pupils with complex needs (SLD).

There are more and more children diagnosed with special needs and they need to be in a school where there needs are met to allow them to deal with society as they grow older.

The changes will reflect the true nature of the children attending the school and will have no negative impact on them or their families

My daughter has severe needs and have benefitted greatly from her time at C.T and I would like other kids to have that chance

My young person attends Avelon (at Corbets Tey) and this proposal will ensure her needs are met-specifically to her high needs

It better reflects the needs of the children at Corbets Tey

I think it will allow the school to specialise more so pupils will get the best help

The school is amazing and any child that walks through the doors will benefit

Gives a truer reflection of the challenges my son faces and the level of support he requires

Although we support the proposal, we are surprised that the proposal does not contain the requirement for an onsite speech and language therapist(s) to ensure that pupils that have such provision within their statement or EHC plan receive the required therapy, which is currently not the case

**Question 4 allowed for comments by consultees who did not support the proposal.**

Section 4 of this report shows all the comments raised against the proposal together with the LA's response addressing the issues raised.

Also 2 email correspondences raising questions and concerns as shown below were also received during the consultation period.

**Email correspondence 1:**

Hi - I am concerned about the redesignation of your school, and would like to know the opinions of your-self, and that of your governing body. I have visited your school on a few occasions, and it has always struck me how happy it is, with a relaxed ethos, which I would not like to see altered. Could I ask what will happen in future to the pre-school, and the kiddies with mild learning difficulties?

Email correspondence 2:

1. I wish to register my strong objections to the proposal to redesignate Corbets Tey School as a “Special School for Children with Severe Learning Difficulty and Speech Language and Communication Needs”.

2. Careful reading of this “School Organisation Consultation” reveals that this proposal is at the expense of, and future detriment to, children with ASD combined with Moderate Learning Difficulty (MLD) and removes parental choice. It is most definitely NOT the case that children in this group can be “better supported with appropriate provision in mainstream schools”, a fact that would undoubtedly be supported by parents of the 45% of children with MLD currently at CTS. It might also be the case that parents of SLD children see the benefit of them mixing with MLD children as at present this certainly works in reverse and for parents of both groups who are united in doing the best for their children.

3. The intention appears to be to remove choice from parents with children with ASD combined with MLD forcing them down the route of mainstream schooling/education when they know that this is not right for their child; personally I would have fought tooth and nail not to have my child in mainstream secondary education. What happens if parents, in the best interest of their children, decline to send them to mainstream schools? Is it the intention to force them to give up work to educate them at home in default of which they will be prosecuted? One parent has already mentioned to me, after the recent Positive Parents meeting with Ofsted inspectors that they may need to consider moving their home out of the Borough and, within the meeting, another parent indicated she may have to move back to her previous borough. This hardly reflects well on LBH.

4. Furthermore there is anecdotal evidence, from parents who were persuaded down the mainstream route, of schools in receipt of additional Borough funding for such students, seeing it as a cash cow. These schools are absorbing the money within their general budget and using some of it for purposes other than that for which it is provided, namely for the support of designated children with Statements or EHC plans. There would appear to be no formal requirement for ring fencing of this funding or of adequate supervision/audit, leaving it up to individual parents to challenge such behaviours and thus be branded as troublemakers.

5. I read, and respond as necessary/appropriate, to everything that comes my way from CTS and LBH relating to special needs provision and nothing I have seen prior to this latest document made any suggestion that increasing the capacity of special schools would be achieved through removal of parental choice and the exclusion of those with Moderate Learning Difficulty. If this had been made clear, and assuming the survey was not selective, it would have produced a different result, regardless of the attempt in this latest document to eliminate opposition by making clear that children with MLD already within the CTS system will be unaffected by the change. Accordingly, the alleged “considerable consultation” and associated survey conducted as part of the High Needs Review are flawed and open to challenge.

6. Furthermore, despite the liberal use of “if approved” throughout this belated ‘consultation’ document, it appears clear from both allowing only (to the day) the statutory minimum consultation period of four weeks and the intended, and fast approaching, implementation date that this is not a “proposal” it is a statement of intent and as such is a ‘done deal’ as far as LBH is concerned and the ‘consultation’ a sham. There is a difference between consultation and meaningful consultation! What is also clear is that this change is cost-driven (“balance of available funding”, “sustainable cost” etc.) and will result in further disadvantaging families who are already disadvantaged, something that will only be fully understood by those directly affected. Life is difficult enough already for parents of SEND children (both SLD and MLD) who increasingly have to fight for everything they get. Please think again and don’t make things worse by pursuing this ill-conceived redesignation of CTS. I am not a natural campaigner but someone must speak up for those future “cohorts” of children, and their parents, who do not have a voice in this ‘consultation’

### Section 4: Comments and Responses

The comments received by respondents who do not support the proposal have been collated in the table below; together with the LA's responses addressing the key points raised with further clarification provided where necessary.

Comments	LA Response
<p>As a school, we requested the change to our designation so that it reflected the current population of our school with just over half SLD and just under half MLD and also to include our specialism in Communication and Interaction. The wording in the consultation document does clearly indicate the intention of the local authority to use places at CTS for only SLD students in the future and parents have been very vocal in their opposition to this. We have concerns that the proposed designation in the consultation document (i.e.: SLD and Speech, Language and Communication) would restrict the admission criteria to our school and this was never the purpose of the re-designation. It was purely to describe the current pupil population accurately. Governors and senior management have been very clear that the wide range of student need in our school is what defines our identity and ethos. We have no reason to want this to be restricted or categorised in such a way that would prevent MLD students who would benefit from a special school environment from accessing this provision.</p>	<p>The Code of Practice 2014 sets out those children with SLD can be described as those “who are likely to require support in all areas of the curriculum and may have other associated difficulties, such as with mobility and communication.”</p> <p>Based on EHCPs, the majority of students 55% at CTS have SLD recorded as their primary need. Where SLD is not the primary need, most others have MLD <i>plus</i> another disability, such as autism. Those who have moderate learning difficulties in addition to other difficulties could still be appropriate for a placement at Corbets Tey. Each child’s needs are considered individually.</p> <p>As part of the High Need Review, it was noted that schools record needs on the census very differently to the local authority, often based on the context of the school. For example, some pupils at Corbets Tey may seem to have moderate learning difficulties in relation to other pupils at the school, but at a mainstream school, their difficulties would be recorded as severe.</p> <p>We have set up a meeting with special schools to discuss the descriptors and ensure there is a clear continuum of support across the current three special schools, and taking into consideration the development of the fourth special school and additionally resourced provision units within mainstream schools.</p> <p>We are also working on revising the guidance and funding to special schools, in partnership with the senior leaders of the schools, to provide</p>

	clarification and consistency across all schools.
We already have an SLD school in the borough that support those student's needs, where are the MLD students meant to attend, mainstream is not the right environment for MLD students.	<p>The three special schools in Havering do not all clearly specify the level of need they cater for and some have an historic specification which no longer accurately reflects their intake.</p> <p>Due to the feedback from this pre-statutory consultation, we are undertaking a review of designations with all three special schools. this will factor in the planned development of a new Free special school for children with ASD and SEMH.</p>
There are not enough schools for moderate learning diffs. Dycorts and Ravensbourne are for SLD Keep CTS for moderate learning disabilities as they need somewhere to go too.	Dycorts has mainly MLD students, although even in this school, the profile of need is becoming more complex and the school is now admitting more children with SLD than previously.
I wanted my son to go to this school and he has mild learning difficulties and autism.	<p>A child with moderate learning difficulties and another disability may still be eligible for a placement at CTS</p> <p>Decisions on all placements for children with special educational needs and disabilities are based on the child's needs and where those can best be met.</p>
Need resource for complex learning needs concerned criteria for severe will leave huge gaps for our children with less severe syndromes although enough to warrant specialist education.	<p>We are undertaking a review of all three existing special schools, and the new Free special school to ensure that across the four provisions, we can meet the needs of Havering children.</p> <p>Our programme of developing Additionally Resourced Provisions within</p>

	<p>mainstream schools will also provide appropriate placements for children with more moderate levels of need, across the spectrum of needs.</p>
<p>I am not happy that the redesignation of CTS does not take into account the needs of pupils and potential future pupils with MLD and their parents. The Council have been seeking for years to force such pupils to attend mainstream schools because it is cheaper and because of an ideology of inclusion, which ignores the needs and wishes of parents. Many, many children with autism may have “moderate” learning difficulties in terms of academic ability, but they need specialist teaching and an environment in which they feel safe and confident, small classes, a SMALL school. As a parent of such a child who attended CTS, and someone who both volunteered and worked at CTS, I saw numerous pupils who had attended mainstream and arrived some years later at CTS totally traumatised by the experience and their parents distraught. Mainstream is NOT suitable for all MLD children and this proposal severely restricts the choice of parents.</p>	<p>Decisions on all placements for children with special educational needs and disabilities are based on the child’s needs and where those can best be met. Mainstream provision may be suitable for some, others may need a mainstream school where there is an Additionally Resourced Provision (ARP) and others may need to be placed in a special school. These decisions are based on need and involve the views of the child and their parents/ carers.</p> <p>Our High Needs Strategy (which parents, carers, schools and other stakeholders were consulted on) sets out our aims, including:</p> <ul style="list-style-type: none"> <li>• Delivering an ongoing programme to create more Additionally Resourced Provisions (ARPs) in mainstream settings</li> <li>• Re-designating special schools, as appropriate; reducing the number of pupils with moderate learning difficulties who attend special schools and enabling special schools to support the growing numbers of children with more complex needs</li> </ul>
<p>The redesignation towards SLD would mean that future MLD pupils (which currently account for nearly half of current pupil numbers) may not have access to provision at CTS and need to go into mainstream. There would be no MLD provision in Havering and this should be provided before CTS becomes solely SLD. In the current financial climate nationwide for schools funding, mainstream schools are not in a position to provide the specialist resources needed for MLD children, particularly at secondary. Every day we read about action needed to tackle potential and actual deficits in mainstream school funding and the need to reduce staffing, which particularly affects the more</p>	<p>Havering has MLD provision at Dycorts School, although the number of pupils with MLD has been on the decrease and no pupils with MLD have been allocated Dycorts in Reception over the last five years. However the numbers have been on the increase for ASD and SLCN – Communication and Interaction needs</p> <p>The vast majority of children being placed at Corbets Tey School, from nursery and Reception upwards are now SLD or MLD + ASD, not children with just MLD. This is the reason for the proposed change of designation.</p>

<p>vulnerable children with SEND.</p>	
<p>I believe that the proposal to redesignate Corbets Tey School does not reflect appropriately in addressing and maintaining appropriate support for children with moderate learning difficulties; to ensure that their needs are addressed in a secure environment. This enables them to continue to develop their social inclusion in their local community, compared to the proposed provision that will receive with severe learning difficulties. Children with moderate learning difficulties can integrate and associate with their peers at Corbets Tey School. This would not happen in a main stream school as there is not the provision for better support. Also as a child becomes older they become more aware in recognising differences in their communication and everyday understanding. This proposal appears to discriminate against the needs of those with moderate learning difficulties.</p>	<p>Decisions on all placements for children with special educational needs and disabilities are based on the child’s needs and where those can best be met. Mainstream provision may be suitable for some, others may need a mainstream school where there is an Additionally Resourced Provision (ARP) and others may need to be placed in a special school. These decisions are based on need and involve the views of the child and their parents/ carers.</p> <p>Our High Needs Strategy (which parents, carers, schools and other stakeholders were consulted on) sets out our aims, including:</p> <ul style="list-style-type: none"> <li>• Delivering an ongoing programme to create more Additionally Resourced Provisions (ARPs) in mainstream settings</li> <li>• Re-designating special schools, as appropriate; reducing the number of pupils with moderate learning difficulties who attend special schools and enabling special schools to support the growing numbers of children with more complex needs</li> </ul> <p>Our approach is always to ensure that we are meeting the needs of children whilst also balancing our budget.</p>
<p>Although it is much needed to have schools that hold the admissions criteria for severe Sen needs, we already currently have schools in the borough that cater for this need. However for children with moderate needs there is very little. Yes there are provisions attached to mainstream schools but that does not fit the criteria for a high percentage of children within Havering who need a special school and cannot cope in a ARP but do not fit into the severe Sen bracket. Also your consultation states that children with moderate Sen will be catered for in mainstream schools. This CANNOT happen this will severely</p>	<p>Part of our plan, within the High Needs Strategy, is to roll out more training for mainstream schools (those with and without an ARP) to improve the confidence, skills and abilities of staff in all schools to support children with special educational needs and disabilities, whatever their level of need.</p> <p>Children’s needs are defined for the purpose of SEND provision in broad categories e.g. SLD, MLD, ASD. However children are individuals and are affected by a range of other factors such as emotional stability, maturity,</p>

<p>have a negative impact on those children’s mental health. Mainstream schools are not equipped or trained to cater for those children. Some of these children cannot manage or cope in a mainstream school yet they will be pushed into one to suit Havering’s purse strings! It is disgusting that this is even being discussed!</p>	<p>behavioural issues, previous experiences and family circumstances.</p> <p>These are all taken into consideration when choosing a school placement.</p>
<p>For children that have special needs but have moderate learning difficulties. There are no places or schools in the borough for this. These children do not fit in and out the borough will not also take them at all.</p>	<p>Havering has MLD provision at Dycorts School, although the number of pupils with MLD has been on the decrease and no pupils with MLD have been allocated Dycorts in Reception over the last five years. However the numbers have been on the increase for ASD and SLCN – Communication and Interaction needs</p>
<p>Implementation would further disadvantage families with ASD+MLD children who increasingly have to fight for everything they get.</p>	<p>A child with moderate learning difficulties and another disability may still be eligible for a placement at CTS.</p>
<p>Special school provision and choice MUST be available in Havering for MLD / autistic children and young people.</p>	<p>Decisions on all placements for children with special educational needs and disabilities are based on the child’s needs and where those can best be met. Mainstream provision may be suitable for some, others may need a mainstream school where there is an Additionally Resourced Provision (ARP) and others may need to be placed in a special school. These decisions are based on need and involve the views of the child and their parents/ carers.</p> <p>Our High Needs Strategy (which parents, carers, schools and other stakeholders were consulted on) sets out our aims, including:</p> <ul style="list-style-type: none"> <li>• Delivering an ongoing programme to create more Additionally Resourced Provisions (ARPs) in mainstream settings</li> <li>• Re-designating special schools, as appropriate; reducing the number of pupils with moderate learning difficulties who attend special schools and enabling special schools to support the</li> </ul>

	<p>growing numbers of children with more complex needs</p> <p>Our approach is always to ensure that we are meeting the needs of children whilst also balancing our budget.</p>
<p>The fact that CTS currently has 45% MLD children means that it is both MLD and SLD and the demand for places from both groups is very evident.</p>	<p>CTS have 41% MLD and 55% SLD pupils currently on roll at the school according to the latest school census figures.</p>

## **Section 5: Conclusion and Next steps**

Thank you to all parents, staff, residents and families who have responded and taken time to submit the feedback questionnaires.

The demand for places in our special schools is increasing, along with an increase in the complexity of need.

We expect that our special schools will:

- Review their designation so that it accurately reflects their intake. We will support schools (including the new free school) to do this in a way that ensures their specialisms complement each other and can meet the range of local need
- Support us to review the funding matrix so that funding levels are appropriate for the complexity of need
- Start to reduce the number of pupils accepted into their schools with moderate learning disabilities (these pupils will be supported in mainstream schools and ARPs)

The Havering High Needs Review 2017 appears to clearly set out that despite the increasing number of pupils with SEND projected; many can be catered for within the existing special school places. This can be achieved by ensuring that where appropriate; SEND pupils currently having their needs met within special schools such as those with Moderate Learning Difficulties (MLD) can in future have their needs met within an appropriate Additional Resource Provision (ARP) setting, thus releasing space within special schools for pupils with more complex needs. This would not involve moving existing MLD pupils from special schools, but rather would mean that going forward; any new MLD pupils coming through would be allocated a place at an ARP rather than at a special school, where appropriate. This strategy would ensure that our special schools are able to develop their provision to support pupils with the most complex types of SEND, which in turn will hopefully reduce Havering's reliance on expensive out borough specialist SEND provision.

In the light of the responses received and as further work continues towards creating additional ARPs, the next stage of the process which is to publish a statutory notice for the redesignation of Corbets Tey school will no longer be taken further at present. However, a review of the SEN need types will be carried out as the three special schools' current intake and population does not accurately reflect the need types of pupils they cater for.

Work will continue with all stakeholders, Corbets Tey School and the other two special schools in the borough to address all concerns and issues that groups or individuals have raised.

## **Section 6: Survey Demographics**

As part of our approach in ensuring a best assessment of the impact of our proposed activity and that we hearing from a wide cross-section of our stakeholders, the consultation questionnaire included additional questions to capture this information.

The data result is represented as below;

### **Profile of respondents**

#### **Ethnicity**

76% of the total respondents provided personal Ethnicity data. 28% were Irish and 72% were White British.

#### **Language**

76% of the total respondents who were surveyed responded to this question. **All indicated they had English as their first language.**

#### **Age**

Of the total respondents surveyed, 80% provided Age data. 26% of participants were aged 35-44 while; those aged 45 to 54 accounted for 29%, 15% were aged 55-64 15 Those aged 25-34 and over 64 made up 6% and 24% respectively of the participants.

#### **Gender**

86% of survey participants, who responded, provided Gender data. **78% of these were female while 28% were male**

#### **Disability**

Of the surveyed respondents 97% provided Disability data. **3% considered themselves disabled while, 92% did not. 2% of respondents were unsure.**

## Appendix A: Consultation Stakeholder List

Consultees
Parents/carers of all pupils in all maintained primary, secondary, special schools and academies in the Borough
Teachers and staff of all maintained primary, secondary, special schools and academies in the Borough
The governing body of Corbets Tey School
The governing bodies of all maintained primary, secondary, special schools and academies in the Borough.
Parents in Partnership
Positive Parents
Prospects
Havering Health watch
Family Mosaic
First Step
Add+Up
Advocacy for All
Early Years Providers in the borough
Trade unions who represent staff at the schools proposed for expansion, and representatives of any trade union of any other staff at schools who may be affected by the proposals.
All Havering Councillors
Havering MPs. <ul style="list-style-type: none"> <li>• Julia Lopez</li> <li>• Andrew Rosindell and</li> <li>• Jon Cruddas</li> </ul>
Dioceses of Brentwood and Chelmsford <ul style="list-style-type: none"> <li>• Chelmsford: Tim Elbourne Director of Education</li> <li>• Brentwood: Mgr. George Stokes</li> </ul>
Neighbouring local authorities where there may be significant cross-border movement of pupils. - London Borough of Barking and Dagenham, Essex County Council, Thurrock and London Borough of Redbridge