

# Address of Convenience protocol

For students starting Reception class, Year 3 or Year 7 in September 2025

# Introduction

This protocol sets out the procedure by which we, Gloucestershire School Admissions team, will investigate potential addresses of convenience.

An address of convenience is considered to be an address named on a school admissions application which is not the child's permanent residence and which increases the priority that the child will receive for admission to their preferred school/s. A child's permanent residence is the residential property at which the child normally and permanently resides with their parent or legal guardian.

## Requirement of this protocol

Admission authorities and coordinating local authorities have a duty to ensure school places are offered fairly and accurately in line with determined admission arrangements and have a legitimate interest in processing data that would prevent a school place being offered incorrectly.

The majority of schools within Gloucestershire include a criterion in their admissions policy where priority is given to applicants living closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home address (including flats) to the Ordnance Survey address point of the school.

Therefore, in order to prioritise applicants fairly and accurately, admission authorities must ensure that applications have been made from the child's permanent address.

This protocol relates to the detection of addresses of convenience for any application processed by Gloucestershire School Admissions; either received directly or via another local authority as part of the co-ordinated admission scheme.

## Home address

A child's permanent home address is defined as 'a child's ordinary place of residence, which is deemed to be the residential property at which the child normally and permanently resides with their parent or legal guardian'. Addresses of a business, relative, friend or child-minder will not be considered as the home address even when the child stays there for all or part of the week.

Where a child resides at more than one address, the address to be used should be where the child lives for the majority of the time, either by private arrangement or as stipulated in a child arrangement order. Where the child spends an equal time between different addresses, it will be up to the parents/carers to agree which address to use.

For the initial allocation of places to Reception, Year 3 and Year 7, made on national offer day, applications will be considered from a child's permanent address as at the national closing date for applications.

## Address of convenience investigations

It is for the admission authority to determine if, on the balance of probability, the address given on an application is a child's permanent residence. Some examples of the use of an address of convenience are as follows:

- An applicant applies from an address where the child does not ordinarily reside, for example a relative's address.
- A family purchases a new property or rents accommodation and uses this address in order to gain a school place, whilst continuing to live in a different property.
- A family moves to live with someone else, often a relative/friend/partner, and uses this address in order to gain a school place whilst continuing to live in a different property.

The following are examples of why an address might be flagged for investigation:

- Targeting of applications for oversubscribed schools
- Applications where the applicant does not appear to be the child's legal guardian

- Applications for children whose current school is not in the area of the home address
- Where information stored on our database indicates another family lives at the same address
- Where the applicant's address does not match the address provided to the child's current or preferred school
- Known short-term rental addresses near oversubscribed schools
- Those who have been resident at an address for less than 6 months and who previously resided at an address further away from an oversubscribed school
- Where a change of address is reported after an application is first submitted
- Where correspondence is returned to the Admissions Team by the Royal Mail as 'Addressee Unknown'
- Where any other suspicions are raised about the permanence and authenticity of an applicant's address

Any individual or organisation may refer the suspected use of an address of convenience to us. The identity of any individual who has made a referral will be kept confidential as part of any investigation and will not be divulged to any party being investigated. Anonymous referrals will be reviewed and investigations instigated where appropriate. Specific evidence which indicates that an applicant may be using an address of convenience does not need to be present for us to investigate an address. Any address can be investigated at any time.

We have a legitimate interest in processing data that would prevent a school place being offered incorrectly. Schools have a corresponding legitimate interest in sharing data with us in order for the detection of such cases. We reserve the right to share any data which is deemed relevant as part of any investigation.

Where any suspicion of an address of convenience involves an address outside of Gloucestershire, we reserve the right to liaise with the relevant local authority as necessary.

In accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), we may share any information supplied as part of your application within the council and other agencies in order to prevent and detect fraud, but only the minimum amount of information necessary and only where it is lawful to do so.

## Address verification process

### Initial Investigation

When an investigation is instigated, a letter/email will be sent to the applicant confirming this. This will:

- Explain the reason why the address is under investigation
- Describe the council's definition of an address of convenience
- Set out why we have a duty to investigate addresses
- Request the applicant provides copies of documentation to verify the address and, on occasion, additional information regarding previous address history
- Seek any other information or evidence deemed relevant to the investigation

If a previous property is still owned by the applicant then evidence will be required showing that the property is no longer the permanent residence of the family, such as:

- the property is either let out on a long term rental (12 months or more)
- the address is uninhabitable

A property may only be deemed unavailable to the family from the date it is sold.

This evidence is required to prove that an applicant was not living at this property at the time of application but does not, in itself, prove that an address of convenience has not been used.

The applicant will be given 7 days to provide the information and documents requested, ensuring the applicant has time to do so and ensuring the documents already exist and are not requested only as a result of the investigation. During this period the application will continue to be processed so that it will not be disadvantaged should the investigation confirm the address stated is the child's permanent residence.

We reserve the right to cross check address information with other departments in Gloucestershire County Council, other local authorities, current/previous schools and relevant agencies providing services for these organisations. We also reserve the right to validate the authenticity of any supporting evidence provided by contacting the original issuer of the document.

## Following Applicant Response

We will assess the information and documentation provided within 10 working days of receipt to decide where, on the balance of probability, the child permanently resides.

If the information provided has raised further queries which need to be explored we will correspond further with the applicant to seek additional information and / or documentation.

Although we reserve the right to make any additional requests deemed necessary, the aim of this process is to ensure that requests are concise, thorough and kept to a minimum to facilitate a prompt resolution to the investigation.

## Address Visits

We reserve the right to make visits to the applicant's address or any other address suspected to be the residence of the family in order to verify the accuracy of address information.

If we are unable to make contact with an occupant during a visit, a letter will be left confirming that an attempted visit took place. This letter will ask the occupant to contact us before the end of the next working day to confirm receipt of the letter and details of the occupant. It would be expected that an applicant living at the address stated on an application should reasonably respond to correspondence left within 24 hours.

## Address of Convenience Decision

If we are satisfied that, on the balance of probability, the child's permanent address has been used then the investigation will be closed and the applicant informed of the decision in writing. We reserve the right to re-open any investigation at any time if new and credible information is received which questions the validity of an address.

If we conclude that, on the balance of probability, an address of convenience has been used then a letter/email will be sent to the applicant confirming this. This letter will clearly state the factors taken into account when making the decision as well as the steps which will now be taken with the application. It will also set out which address is considered to be the child's permanent address.

## Address of convenience confirmed

Where an address of convenience has been confirmed we may take a variety of steps, depending on the current status of the application as well as the type of application made. These are set out below.

### No place allocated

If an applicant has not yet been offered a school place then the child's permanent home address, as determined by us, will be used for admissions purposes on the application form.

### Place allocated but pupil yet to start

If the school place would not have been offered from the child's permanent address, as determined by us, then the place offered will be withdrawn.

For Reception intake - If an offer is withdrawn and the child's permanent residence, as determined by us, falls within Gloucestershire then the options for schooling will be discussed with parent/carer.

For Year 3 and 7 intake only - If an offer is withdrawn and the child's permanent residence, as determined by us, falls within Gloucestershire then an alternative offer will be made so the child is not without any school place.

## Place allocated and pupil has started

In line with the School Admissions Code 2021, if it is deemed that an address of convenience has been used and the place was therefore fraudulently obtained, the school can withdraw the place. In deciding whether to withdraw the place, the length of time that the child has been at the school must be taken into account.

In all cases above, if the applicant is making an application during the normal round admission; i.e. entry the following September in Reception, Year 3, or Year 7, and the child's suspected permanent address falls outside Gloucestershire, the applicant will be directed back to their home authority.

## Right of Appeal / Complaints

Applicants do not have the right to appeal against the council's decision that an address of convenience has been used. They will, however, have their statutory right of appeal if, following an application, a place is not allocated at a preferred school.

## Review

This protocol was created on 3 September 2024 and will be reviewed and updated as and when required to ensure that it accurately reflects the processes undertaken by the School Admissions team.