**PORTSMOUTH & WINCHESTER
DIOCESAN BOARD OF EDUCATION**

# Portsmouth and Winchester Diocesan Board of Education (DBE)

**Isle of Wight School Place Planning Consultation Response – October 2024**

**This submission should be read alongside the submission from the Diocesan Bishop, Rt Revd Dr Jonathan Frost, and the specific submissions from our three schools.**

**1.0 Overall Context**

1.1 The DBE is responding to the consultation in support of all three Church of England (CE) schools named in the paper remaining open.

1.2 Contrary to how our schools are often referred to by local authority officers and councillors, Church of England schools are not faith schools. They exist to serve their local communities, welcoming children of all faiths and none and operate in accordance with an ethos and distinctiveness rooted in Christian values. They are inclusive schools and valued by the communities they serve. They are schools with a faith designation, which is a significant difference to ‘faith schools’. They are there to serve the ‘common good’ as explained in the Church of England’s vision for education: ‘Deeply Christian, Serving the Common Good’.

1.3 There are good and valid reasons for the DBE’s stance. It is not simply the DBE making a case to avoid any church schools closing. When rationale is clear and objective, and closures will result in obvious benefits to the well-being and educational outcomes of the young people in those schools, then the DBE would support the local authority (LA). For example, it supported the closure of All Saints’ CE Primary School in Freshwater, enabling the relocation of Yarmouth CE Primary and the building of a brand-new school facility. There were clear benefits and the rationale for the closure stood up to scrutiny.

1.4 The DBE recognises the budgetary challenge faced by the LA. Surplus places are contributing to the financial challenges that leaders face in producing school budgets that balance. However, the DBE has been made aware that school budgets are not necessarily causing the council’s Education budget deficit. In fact, it understands that, cumulatively, as of the academic year end 2023/2024 they are in surplus. Where the mounting costs lie are in SEND provision, the High Needs Block. Surely therefore, SEND provision should be of a more urgent issue to address rather than surplus school places in addressing the Education budget deficit?

1.5 Parental choice of schools is important. Indeed, this is highlighted in DfE statutory guidance, ‘Opening and Closing Maintained Schools (OCMS)’, which states on p39: *‘In deciding a proposal to close a school that has been designated with a religious character, decision makers should consider the effect that this will have on the balance of denominational provision in the area.’*

1.6 The DBE is particularly concerned that the proportion of schools named for closure in the consultation paper designated CE amounts to 50%. This is disproportionate when considering the total school estate on the island, of which CE schools represent only 27%. For two of the CE schools named in the paper, the suggested destination schools are not CE. In the case of Oakfield CE Primary School, you are proposing to take away the only CE school in Ryde where there are four other schools without a faith designation, thus reducing parental choice. The DBE considers this to be an unacceptable and unfair removal of CE education provision on the island.

1.7 It is the view of the DBE that the future of our school sites should not be considered as part of the decision to close a school. The school closure decisions should be driven by the surplus places issue and related demographics alone. The future of CE school sites is decided upon by the site trustees with a responsibility to discharge the purposes of original trust deeds. This could mean a school is closed with a view to the site being re-purposed but later discovering that purpose cannot be achieved. Therefore, the school would have been closed for the wrong reasons. All three CE school sites have been identified for future use; this may not be possible and is not the LA’s decision.

1.8 The rationale for the schools identified for closure is not wholly clear or transparent. Principal reasons given for different schools are not consistent. Pupil outcomes and school achievement data have been used as justification for the closure of all three of our named schools. It is the DBE’s view that this is flawed for the following reasons:

1. You are not comparing schools on a like for like basis. Contexts vary and two of the schools named have high proportions of pupils with EHCPs, FSM, LAC, etc. Progress measures have not been used which may show a different picture.
2. Standards in schools can be improved. It is easier to do that than move children from a school in one community to another, particularly from communities where levels of deprivation are high. Our view is that demographics should be the primary issue when considering surplus places. The impact on communities that are not necessarily able to adapt to changing circumstances is likely to be significantly detrimental.
3. Using the criteria in the DfE publication, ‘OCMS’ it states that the following should be used (although we accept, not limited to)*: • there are surplus places elsewhere in the local area which can accommodate displaced pupils and there is no predicted demand for the school in the medium to long term; • it is to be amalgamated with another school; • it is no longer considered viable; • it is being replaced by a new school (as sections 10 and 11 provide for)*.

It does not mention standards in this list of priorities for consideration.

1. It is our understanding, that when schools are causing concern (see DfE publications ‘Schools Causing Concern’) it would be the Regional Group, acting on behalf of the Secretary of State, that would decide whether a school should close for reasons of standards and pupil outcomes. This is a separate issue to addressing surplus school places.
2. Schools identified for parents to send their children to also have poor data and/or assessed as Requires Improvement by OFSTED. Why close a school on the basis that its data and performance is not good enough, yet recommend destination schools in a similar position?

1.9 Two of the three CE schools named in the paper are designated rural schools. The DBE understands that despite the presumption against closure of rural schools, where the rationale is clear and obvious then a rural school can be closed. The DBE is of the opinion that the justification is not clear enough and could be subject to challenge. ‘OCMS’ states, *‘the case for closure [of rural schools] should be strong and clearly in the best interests of educational provision in the area.’* The DBE’s arguments as to why it believes this is not the case is set out in the individual schools’ section of this consultation response.

1.10 The DBE is of the view that the proposals disproportionally affect families living in deprived areas, in particular with regards to travel arrangements to and from destination schools. ‘OCMS’ states on p37 that, ‘*Decision makers should be satisfied that the proposal will not adversely impact any particular group, including those with protected characteristics or who are disadvantaged (for example, those who are eligible for free school meals or pupil premium....should consider whether the proposal will result in unreasonably long journey times or increased travel costs for local authorities, or families, as well as any increase in the use of motor vehicles’*. Implications for vulnerable families will also be expanded upon in the individual schools’ section of this consultation response.

1.11 The DBE understands from other stakeholders that should the proposals go ahead, there is a strong likelihood that many parents may choose to electively home educate due to the difficulties in taking their children to the suggested destination schools. This would remove more numbers from the school system and thus reduce the possible funding schools can receive on that basis.

1.12 According to non-statutory DfE guidance, ‘Local Authority Pupil Planning Areas’, planning areas should have at least more than one school. ‘Ryde Rural’ has only two schools within its area, and although satisfies this criterion, it does so minimally. Surely this planning area should be considered together with ‘Ryde Town’ or ‘Sandown and Shanklin’, or even split between the two. Have these two schools been considered simply as an entity on their own? If so, the DBE would consider this a flaw in strategic thinking.

1.13 It has been reported to the DBE by Headteachers and Chairs of Governors that there is a growing distrust and lack of confidence in the process. This is due to information being shared at meetings being inconsistent with the published consultation paper, together with other statements being ambiguous or disingenuous. For example:

1. The DBE has been informed that at the very start of the process, schools were told that all maintained schools and academies would be considered for closure. No school was safe from consideration. However, schools are later informed that academies will not form part of the consultation paper.
2. Although separate to this consultation process, the DBE has been informed that bids to provide a new SEND school on the island were invited. Schools were informed that no bids had been received, despite knowing that this was not the case. It was only when this was challenged that a clear and transparent answer was provided.

1.14 These inconsistencies lead to a lack of confidence in process.

1.15 The DBE believes there to be a strong argument for a pause in the process. At the public consultation events, officers stated that ideas would be welcomed from stakeholders. Would it not have been more sensible to have a mechanism for discussing and presenting ideas *before* a consultation process is undertaken that names specific schools? This would have avoided the damaging affect this has had on staff and family well-being and parents moving their children out already from the named schools (despite this being *just* a consultation, not a decision). The DBE would ask that there is a pause in the process to enable this to take place and for creative solutions to be explored fully.

1.15 The DBE retains the right of appeal to the Schools Adjudicator against closure of its diocesan church schools.

**2.0 Arreton CE Primary School**

2.1 The DBE’s position is clear, that if a CE school is closed then families should have an alternative CE school within a reasonable radius of travel. The destination school named in the strategy document for Arreton families to attend is a community school. The nearest CE schools are The Bay CE School, which is 5.5 miles away and Newport CE Primary School which is 5 miles away. As stated previously in this document, OCMS states on p39: *‘In deciding a proposal to close a school that has been designated with a religious character, decision makers should consider the effect that this will have on the balance of denominational provision in the area.’* This has clearly not been considered seriously enough and your decision to propose Arreton CE Primary School for closure is detrimental to parental choice and unfair on a significant group of stakeholders.

2.2 Whilst it is clearly the case that pupils attending Arreton come for a wide geographical spread, it is one of three schools proposed for closure that serves the south-central region of the island. Arreton is popular with parents as it is on a commuter route to Newport and the school site offers wrap around care. The proposals include the current preschool remaining on the site. If the LA considers that a preschool will remain viable with families travelling to the area for provision then surely that is also the case for parents of school aged children.

2.3 It is the DBE’s understanding that 81% of pupils attending Arreton live in the south of the island, which is also served by Godshill and Wroxall, two other schools being consulted on for closure. Is Barton school necessarily the most appropriate or suitable school for families to be offered school places at? Would this also provide for a large cost to the LA for families eligible for home to school transport?

2.4 Arreton CE Primary School is designated as a Rural school (rural town and fringe). ‘OCMS’ states, *‘the case for closure [of rural schools] should be strong and clearly in the best interests of educational provision in the area.’* Therefore, clear rationale needs to demonstrate why there are no alternatives but to close a rural school.The DBE does not accept that clear and transparent criteria have been applied.

2.5 The DBE acknowledges that recent history suggests standards at the school need improving; the school has received two subsequent RI OFSTED judgements. However, the current leadership of the school is doing a good job improving outcomes. This has been acknowledged by an OFTSED monitoring visit in September of this academic year which stated that, ‘*Action has been taken to put in place the necessary processes and structures to improve the consistency and quality of provision at the school.’* The DBE is of the view that closing a school simply because of low standards is not the right justification.

2.6 Arreton CE Primary School has not been recently inspected under the SIAMS framework but nevertheless has a very strong Christian ethos. The DBE has received a number of written submissions from parents who point to this being one of the most significant factors in deciding which school to choose for their children. Removing a church school option serving the rural south of the island is again reducing parental choice.

**3.0 Brading CE Primary School**

3.1 The DBE’s position is clear, that if a CE school is closed then families should have an alternative CE school within a reasonable radius of travel. The Bay CE School has been named as a destination school for families currently at Brading. However, travel costs for families would be significant – the DBE understands that travel from Brading to Sandown on the bus would cost over £2k per academic year. Almost half (41% as uoted below) of the school population are from families entitled to free school meals – travel costs like this will be unaffordable. This route is also a problematic one with the main road having been flooded for a large proportion of last year, for example (50 days). Concerns that poor attendance will result due to the difficulties with home to school transport. Evidence is clear that poor attendance is closely linked to poor pupil outcomes.

3.2 Brading CE Primary School is designated as a Rural school (rural town and fringe). ‘OCMS’ states, *‘the case for closure [of rural schools] should be strong and clearly in the best interests of educational provision in the area.’* Therefore, clear rationale needs to demonstrate why there are no alternatives but to close a rural school.

3.3 Brading’s data was quoted as one of the main reasons for it being selected for closure. However, it has a very high proportion of EHCP’s, SEND and PP children, so data comparisons with other schools are not necessarily fair, progress measures would be a fairer comparison.

3.4 Despite pupils’ attainment overall being below national standards, Brading was rated ‘Good’ at its most recent OFSTED inspection, suggesting that despite the low data, inspectors viewed the quality of leadership and teaching and learning to be good. In other words, despite challenging circumstances, the school performs well for its pupils. Comparing schools simply by attainment data is unfair. The school’s context is very important and Brading serves many families from deprived backgrounds.

3.5 In addition, statistics from 2023/2024 academic year suggest that the proportion of children at Brading claiming free school meals is 41.2%, significantly above the island average of 24.7% and national average of 24.6%. The vulnerability of families is clear from this data which the DBE understands relates to 60% of the children attending this school. The closure of this school will penalise a vulnerable community, those least able to cope with change and transport implications this would cause.

3.6 Brading has also recently received an extremely positive SIAMS inspection report (which no longer provide one-word judgements), praising work for SEND and vulnerable pupils: *‘The school is an inclusive community in which people know they are loved and respected for who they are. Pupils and adults treat each other very well and celebrate the uniqueness of each individual………The rich curriculum provides opportunities for pupils to ‘unlock their potential’, and is thoughtfully adapted to meet individual needs, especially for pupils with special educational needs and/or disabilities (SEND).’* It is clear to us that the school provides well for vulnerable families and its closure would be very detrimental to children’s well-being and development.

3.7 Brading has established strong community links through the Brading Community Partnership. Organisations such as this make a significant contribution to the local area and are an invaluable support to vulnerable families. The closure of the school would result in many projects becoming unsustainable, again impacting the more vulnerable in society the hardest.

3.8 Brading has a history of supporting the LA in placing pupils with SEND and those in vulnerable situations. The experience and expertise of the staff employed the school would surely be an asset in addressing SEND provision challenges. Not only could the school remain open for its catchment families but the SEND specialist provision to be formalised to accommodate need in a school that is very experienced and integrating pupils in a mainstream setting.

3.9 Our understanding is that Brading currently has a healthy budget surplus, therefore the school is sustainable.

3.10 Another school in the planning area is rated RI with a similar surplus of places, poor data and is geographically closer to other schools in the area yet has not been named for potential closure. Where is the consistency in applying the criteria you have set?

**4.0 Oakfield CE Primary School**

4.1 The DBE’s position is clear, that if a CE school is closed then families should have an alternative CE school within a reasonable radius of travel. Oakfield CE Primary is the only CE provision in Ryde; the nearest two CE Primary schools are Bembridge CE Primary and Brading CE Primary which are 6.1 miles and 4.2 miles away respectively, the closer of the two also being proposed for closure. As stated previously in this document, OCMS states on p39: *‘In deciding a proposal to close a school that has been designated with a religious character, decision makers should consider the effect that this will have on the balance of denominational provision in the area.’* This has clearly not been considered seriously enough and your decision to propose Oakfield CE Primary School for closure is detrimental to parental choice and unfair on a significant group of stakeholders.

4.2 Closing a school should be based on clear criteria (as outlined in DfE guidance OCMS) – the focus is on surplus places driven by lowering birth rates and population data for families. The main criteria for justifying Oakfield for closure relates to standards and its triple RI OFSTED judgements. Our understanding, as outlined in the DfE publication, Coasting Schools, is that closing a school because of poor standards is a decision for the RG. A surplus place decision should be predominantly based upon geography of population data and the need for a school in its community and location.

4.3 Your data shows that 409 school-aged children live within 2 miles of the school. This is a greater number than three of the other schools in the planning area and is surely enough to sustain a school. Standards can be improved, and are improving at the school, particularly in phonics and KS1 where recent results are above national standards; EYFS was rated as ‘Good’ during the most recent OFSTED inspection. Oakfield’s data was quoted as one of the main reasons for it being selected for closure. However, it has a very high proportion of EHCPs and children with SEND, LAC and PP (the highest of all the schools in Ryde) so data comparisons with other schools are not necessarily fair – progress measures would be a fairer comparison.

4.4 According to your data, of the six schools in the planning area, by 2027 it will have the 4th least high surplus of pupil places. Currently it has a negative surplus. Given this consultation is about reducing surplus places, surely this statistic should be one of the most important.

4.5 Oakfield is a very strong Church school – this was recognized when the school received an ‘*Excellent*’ SIAMS grading in June 2023. In the report in acknowledges many things but, in particular, the impact of the school’s Christian vision and ethos: ‘*Bold decisions in curriculum delivery and pupil grouping, alongside strategic and inventive approaches to enhancing wellbeing and spiritual development, empower the whole community. This reflects the unwavering school commitment to every pupil build hope for a bright and fulfilling future.’* There are many other comments in the report which speak of the commitment of the school to address the needs of its pupils and families. The closure of this school would mean the loss of a crucial lifeline for many families.

 4.6 The school is a real community hub offering support to families beyond normal schooling, for example the Community Food Pantry and Family Hub. The school serves a deprived area and supports many vulnerable children and families. Closing this school will have a significant detrimental impact on some of the most vulnerable families on the island. This is evidenced in 2019 Indices of Deprivation as Oakfield is situated in a ward in the lowest decile, ie in the 10% of most deprived wards in the country. In addition, statistics from 2023/2024 academic year suggest that the proportion of children at Oakfield claiming free school meals is 45.1%, significantly above the island average of 24.7% and national average of 24.6%.

4.7 Families living in deprived areas are the least able to manage changes in schooling, in particular with regard to transporting their children to and from school. Many of the families cannot afford a car with walking or public transport being the only options. Public transport of course has a cost associated with it (financially penalizing those who can least afford it) and walking requires safe and reasonable routes to school. Greenmount school has been named as a school that can accommodate Oakfield pupils should the school be closed. It is our understanding this would be between a 1.6 and 1.8 mile walk for the majority of families, therefore not qualifying for home to school transport support. This walk involves significant hills and narrow pavements, meaning a difficult and tiring commute for many families. This would have a detrimental effect on pupils’ readiness to learn and cause stress and anxiety for parents.

4.8 Out of the 6 schools in the planning area, three are predicted to have greater pupil place surpluses, two of these also have RI OFSTED judgements and results below national levels. Therefore, why has Oakfield been proposed for closure? Is it because the school site would be ideal for a SEND satellite provision? Officers have given assurance that this is not the case but given its inclusion in the strategy documents and the analysis of other data, you can see why a number of stakeholders are drawing this conclusion.

**5.0 Key Summary**

5.1 Your proposals, should they take effect, will negatively impact some of the most vulnerable communities on the Isle of Wight.

5.2 Further disruption to the education of their children would be counterproductive in terms of their academic and social development, contrary to the aim to improve standards on the island.

5.3 Further financial strain on families in such areas is also an unfair burden to impose on these communities.

5.4 The criteria for identifying schools for closure is not clear and transparent; use of ranked criteria would have communicated an objective and impartial process. This is not evident.

5.5 The DBE urges the LA to re-consider its plans in such a way that it does not directly impact so negatively on some of the most deprived communities on the island.

5.6 The DBE urges the LA to pause the process and allow for greater discussion involving key stakeholders to consider alternative proposals.

**6.0 Alternative proposals**

6.1 The DBE would like to understand what other options have been considered. For example, federations combined with PAN reductions could achieve economic saving, retain schools in their locality and plan towards reductions in surplus places, whilst protecting the school estate for potential future growth.

6.2 Federations of church schools and church schools with community schools already work successfully on the island. Also, there are many mainland examples of this in our two dioceses. The DBE would be pleased to work with the Local Authority to explore such options and how federations could potentially achieve the objectives set out in the consultation paper.