

DUDLEY METROPOLITAN BOROUGH
COUNCIL
DIRECTORATE OF CHILDREN'S
SERVICES

Response to Objections on School
Organisation Proposals

Closure of Beauty Bank Primary School

2 February 2006

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1. THE SCHOOL ORGANISATION PROPOSALS

1.1. It is proposed:

To discontinue Beauty Bank Primary School, Forge Road, Stourbridge, West Midlands, DY8 1XF with effect from 31 August 2006.

Parents of children attending Beauty Bank will be offered places at alternative nearby schools including Greenfields, Amblecote, The Ridge, St. James CE and Gig Mill Primary Schools. Subject to School Organisation Committee decisions, individual support will be provided for parents with regard to the options available and any specific assistance required.

It is expected that most pupils will join the roll of Greenfields Primary, which from 1 September 2006, will operate on two sites until consolidation onto a single site. The Beauty Bank buildings and site will continue as additional accommodation for Greenfields Primary until the consolidation programme is complete.

Beauty Bank has capacity for 208 places but the number of pupils attending (Reception to Year 6) has fallen from 197 in January 1997 to 134 in January 2005. In January 2006 the number had fallen to 130. With the fall in pupil numbers across Dudley reducing the level of budget available for distribution to all schools combined with a reduction in the budget share the fall at Beauty Bank due to their own falling numbers, the school will not be able to afford the quality of education to which pupils are entitled. It has fewer pupils than any other primary school in Dudley and is no longer viable.

Greenfields Primary School, assessed using DfES methodology, has capacity for 280 pupils. The school is frequently oversubscribed with the number of pupils attending since 1997 fluctuating slightly above or slightly below capacity. Although the school is relatively new and in good condition there are severe pressures on the accommodation in a several areas.

Greenfields Primary School has a separate playing field within a few minutes walk and roughly equidistant from Beauty Bank and Greenfield Primary Schools. The playing field is large enough to accommodate a new primary school building with places for 420 children aged 5 – 11 with additional facilities for younger children and the wider community. The playing field is situated next to Longlands College. The option of acquiring some additional land to increase the potential for achieving significant improvements in the local area including access and off street parking is under consideration. However, this is not essential to complete the scheme as the minimum land required is already in Council ownership and in

education use. It will not be possible to confirm the timescale for the new building until the outcome of the option on additional land is known. It is anticipated that a clear position will be known by the middle of 2006. Over the next few months outline programmes will be prepared in conjunction with Greenfields Primary School taking into account the options for existing land and those with additional land.

Following consultation with parents, the governing body of Greenfields Primary have committed to joint working with Beauty Bank Primary and to develop a staffing structure required to maintain two sites for a limited period and for consolidation onto a single site. Commitment has also been given to ring fencing posts in this staffing structure for Beauty Bank staff. It is anticipated that appointments will be made where there is a good match.

Where parents opt for places in schools other than Greenfields Primary they would be expected to transfer to their new schools from 1 September. All parents of pupils displaced from Beauty Bank, as with other schools proposed for closure, will be entitled to financial support to ensure any uniform or other equipment is provided as a one-off. This is intended to support immediate integration into new surroundings. Additional strategies will also be developed between Beauty Bank and alternative schools to support smooth transition prior to 1 September. Initial discussions have already taken place between Greenfields and Beauty Bank.

The governing body of Greenfields will be responsible for all matters relating to the maintenance of two sites from 1 September 2006. Dudley Council will provide support for all staff in finding alternative posts either as part of Greenfields Primary or other Dudley Schools or elsewhere. It is not anticipated that there will be any requirement for compulsory redundancies arising from the Primary Schools Review.

2. INTRODUCTION

Context

- 2.1 Dudley has managed numerous changes to the pattern of schooling at several critical points over the last 60 years. Political, educational and demographic changes have led to the building of new schools, changing their sizes and closing schools. Dudley is now facing again the need to change and, with the benefit of much better information, can respond with a degree of certainty to meet the needs of children for the next 20 – 30 years. A record of school changes that have taken place in Dudley is currently being assembled. The latest information on these changes is included in Appendix E as a work in progress list.

- 2.2 The surplus of places in the Borough's primary schools was highlighted in an external consultancy report by KPMG in 1999, and in the OFSTED Inspection Reports of 2000 and 2002. The more general outcomes of the OFSTED inspection in 2000 caused a delay in the implementing of a full review and action plan, although the need for such a review featured in the Post OFSTED Action Plan in 2000 and 2002.
- 2.3 Consultation on specific school proposals was carried out in 2002. Responses were received from Headteachers, governors, councillors, parents and others. The consultation led to action in several cases including further consultation on the establishment of a new Voluntary Aided (VA) school for Halesowen to replace two existing schools, Halesowen CE and Hasbury CE Primary Schools.
- 2.4 The annual birth rates (using academic year September - March) in Dudley have reduced from 4,116 in 1990 to 3,344 in 2003. There was a slight increase to 3,514 in 2004 but long-term projections indicate annual births of around 3,300. The live birth figures are included in Appendix G. This is a major problem for all Dudley schools because the amount of money Dudley receives through the Council's revenue grant from government is based on the number of pupils attending schools. As the pupil numbers fall the level of government grant falls and school budgets have less capacity to meet the costs of providing education.
- 2.5 The Department for Education and Skills (DfES) sets the minimum education budget for Dudley based on the number of pupils attending its schools. As the demand for places falls, schools will receive proportionately lower budgets, adding significantly to the difficulty for schools of meeting the costs of the quality of education to which all pupils are entitled.
- 2.6 The total number of pupils attending Dudley primary schools is falling by around 400 per year. Based on the numbers of children already born, primary pupil numbers in Dudley schools are projected to fall by a further 2,358 (almost 10%) between 2005 and 2010 before the total number stabilises at this low level.
- 2.7 The reduction of 2,358 primary pupils will lead to an annual fall in the Council's revenue grant funding from the DfES and a reduction of £7.8m by 2010, at current prices. The figure of £7.8m is based upon a current 'per pupil' unit funding of £3,329, the DfES baseline assessment for a 'Dudley' pupil in 2005 which will be applied for calculation of the Dedicated Schools Grant (DSG) for 2006 onwards. This data has just been released by the DfES to enable the Council to model future budget scenarios.

2.8 The primary sector delegated budget in the current financial year is £71.3m or 49% of the total resources delegated to schools. If the current provision of 82 primary schools were maintained with 2,358 fewer primary pupil places, it is estimated that each primary school budget would be reduced by an average of 10% by 2010. Individual primary school budgets currently range from £0.5m to £1.9m. Therefore schools could expect to see an average annual budget reduction ranging from £50,000 to £190,000 by 2010. With a projected 5,000 surplus places in the system some schools would experience much greater reductions and also considerable year-on-year instability. This is not in the best interests of children.

2.9 Dudley primary schools currently spend their delegated resources in the following proportions:

Staff	83%
Premises	6%
Supplies and services	11%

Premises costs are largely fixed and there is limited scope for reductions in services, learning materials and other supplies. The main focus for balancing budgets is therefore likely to be in the largest area of expenditure, which is staffing. If the £7.8m reduction were directed at staffing in primary schools, this would equate to an indicative reduction of 230 posts in schools, or more than 10% of the current workforce in primary schools.

2.10 It has now become imperative to take action to ensure that the pattern of primary school provision is cost effective, with only sufficient surplus places to allow a degree of parental preference and in order to cope with any unplanned expansion. It is important to say that these proposals for Beauty Bank Primary School combined with the other changes will affect every primary school in the Borough, by ensuring that money is not wasted on maintaining surplus places but directed to the education of children.

2.11 The Dudley Cabinet Member for Education and Lifelong Learning approved the start of a consultation process on proposals to change the existing pattern of primary school provision in Dudley. The initial consultation started on 12 September and ended on 21 October. The consultation was based on three documents; Learning for the Future Primary School Review Consultation Document, Consultation Summary and Response Form. Paper copies of the documents were circulated widely and posted on the Council website www.dudley.gov.uk. The consultation process involved a series of meetings with parents, staff and governors in those schools most affected. Additional meetings

were convened on request. There has been a high volume of telephone calls, letters, emails, response forms and other correspondence as set out in the Cabinet Report, Appendix 1 and Appendix 2 included as Appendix G.

- 2.12 The total number of returned questionnaires is 778. This represents a return rate of 7.07% from the 11,000 copies distributed. The documentation was easily accessible via the website. Of the returned questionnaires, 126 respondents made general comments or no comments. Responses were received with reference to 73 of the 82 primary schools. The 126 respondents in the 'none' category gave a higher 'yes' response to all questions. The highest number of responses (386 almost 50% of total question responses) came from schools where either closure or amalgamation was proposed. The 'no' percentage responses from this group tended to be higher than the 'yes' responses for questions 1, 3, and 4. Similarly the remaining 169 respondents from representatives of schools where there were no changes proposed or an adjustment in admission numbers, gave a higher 'yes' response. Further details of the responses are listed in Appendix 2 included in Appendix G and all of the responses are available as a public record. Given the importance and the urgency of the need to address the financial implications of the surplus places in Dudley schools the level of response is at best disappointing.
- 2.13 The proposals outlined in the consultation documents emerged from previous consultations on principles and process. The proposals reflected the need to address the serious issue of over 5,000 surplus primary places by 2010. This projection is based on over 2,000 surplus places already existing in 1997, numbers attending primary schools, and birth rates.
- 2.14 In-flow and out-flow of pupils to other Boroughs is projected to continue unchanged. However, this is the most optimistic position as other Boroughs are experiencing the same trends in birth rate as Dudley. In this situation even if the same percentage of the total number of pupils resident in other authorities continued to attend Dudley schools the actual number of pupils would reduce. Other authorities are expected to take action to ensure that they retain as many of their resident pupils as possible. This includes substantial capital investment in new schools and the reviews of school provision. For example, the Archdiocese of Birmingham has started a review of primary and secondary provision, which covers 13 local authorities including Dudley MBC.
- 2.15 During the consultation process, several alternative proposals were suggested and new opportunities arose. For example, the Secretary of State announced in October that Dudley had made a successful bid for over £8 million to replace Wrens Nest Primary School and Old Park Special School. The alternative

proposals have been considered carefully and where appropriate revisions were included in the Report to Cabinet of 17 November.

2.16 The Primary Schools Review is part of 'Investing in the Future' (IIF), a wide-ranging planning framework designed to link a series of national and local initiatives into a coherent and manageable development programme. The initiatives that will impact directly on provision for children include:

- Pre-school settings;
- Children's centres;
- Primary Schools Review;
- Secondary Review (including 14 – 19 strategy);
- Specialist schools;
- SEN strategy;
- Extended schools;
- Integrated children's services; and
- Community use including leisure, libraries and lifelong learning.

(IIF was previously known as 'Learning for the Future', but with the development of joined up children's services it is important that the major policy framework should be perceived as covering areas additional to learning.)

2.17 The Primary School Review also takes full account of the long term planning for Dudley, the Black Country and the West Midlands. The proposals in Appendix 2 take account of the relevant elements of the Unitary Development Plan, Local Transport Plan and in the emerging Black Country Study and Regional Spatial Strategy.

2.18 The publication of statutory notices was undertaken in line with decisions made by the Cabinet. The period for publication and representations to be made began on 21 November 2005 and ended on 2 January 2006. Arrangements were made to receive representations on the 3 January due to any difficulties experienced during the holiday period.

Beauty Bank Primary School

2.19 Beauty Bank Primary School is situated in the southwest of the Borough and is in close proximity to the Stourbridge ring road. The main school building was erected in the 1930's with additional teaching and ancillary areas built post 1976. The school also has a temporary classroom building.

2.20 School Facilities and Condition

The condition survey on the building, carried out in September 2002, listed necessary repairs amounting to approximately £73,000. These included: repairs to roofs, ceilings, external walls, windows and doors, redecorations, fixed furniture and equipment, floors and stairs and electrical services. Much of this work has been carried out and the building is in reasonable condition.

However, in addition to condition buildings are also assessed against DfES criteria related to suitability – are they fit for purpose? A number of the areas within the building have been assessed as unsuitable for the purpose that they are intended for.

In accordance with DfES requirements the school was surveyed in February 2005 against suitability criteria. The survey confirmed that there were shortfalls of accommodation in the following areas

- a) Insufficient toilet facilities (four toilets for 60 pupils)
- b) No workspace for members of staff
- c) Small hall, not large enough for whole school activities
- d) No separate store for large PE equipment
- e) Four classrooms subject to solar heat gain and lack of appropriate ventilation
- f) Mobile classroom too small, no water facility, isolated location and no toilet provision
- g) Lack of parking spaces for staff and visitors

2.21 Financial Considerations

Overall Dudley primary schools have capacity for 29,513 pupils, of which 3,309 surplus places (11.2%) were available in January 2005.

At local authority level, school funding is based on the total number of pupils on school rolls annually. The year-on-year fall in numbers leads to an ongoing decrease in the overall schools' budget, the Individual Schools Budget (ISB). With effect from April 2006 this will be separated from the overall local authority budget and will be allocated as a separate grant, the Dedicated Schools Grant (DSG).

Based on the numbers of children already born, the number of primary pupils in Dudley is projected to fall by a further 2,358 by 2010. This will result in an annual fall in grant funding received from the DfES in excess of £1m per year. By 2010, using the current unit per pupil funding of £3,329, primary schools will receive £7.8 million less than in 2005/06, a reduction of 9%.

2.22 Surplus Places

School Name	No. of pupils *Jan 2005	No. of pupils **Jan 2006	Net Capacity	Net Capacity (planned)	Surplus Capacity *Jan 2005	Surplus Capacity **Jan 2006
Beauty Bank Primary School	134	132	208	-	74	76
Greenfield	280	277	280	420	0	3
Amblecote	308	310	378	315	70	68
Gig Mill	497	500	565	525	68	65
The Ridge	197	200	210	210	13	10
St James's CE	369	352	420	420	51	68
Total (Alternative Schools)	1785	1771	2061	1890	202	214
* Source: DfES Pupil Level Annual School Census (PLASC) Reception to Year 6 Count Jan 2005						
** Source: Directorate of Children's Services (provisional figures subject to verification in School Census 2006)						

All of these figures exclude nursery age and younger children.

Alternative Provision

The potential number of children who would be displaced from Beauty Bank Primary at the time of closure totals approximately 130. This figure is calculated using current pupil numbers in Reception to Year 5, together with a new Reception intake estimate (based on the current Reception number). It is anticipated that all pupils, either current or potential can be accommodated in alternative provision once the additional capacity is available.

- 2.25 Analysis of the distance travelled by pupils attending Beauty Bank Primary indicates that on the whole there is little negative impact on these pupils travelling to the alternative schools proposed, with 83% of pupils within 1 mile of Greenfield compared to 88% within 1 mile of Beauty Bank. Further analysis shows that 16 pupils live greater than 1 mile from one of the 4 alternative schools, which is exactly the same number of pupils who live greater than 1 mile from Beauty Bank. These proposals are consistent with the principles and statements of intent set out in the Primary Review Refresh 2004 Consultation.

2.26 Other Options

- Federation
- Reduction of capacity
- Closure of other schools
- Amalgamation

Federation or amalgamation with other schools in Dudley was considered. There is capacity for 208 pupils at Beauty Bank measured using DfES methodology. The number of pupils attending Beauty Bank has fallen from 197 in January 1997 to 134 in January 2005 resulting in 74 surplus places. The current number of pupils attending in January 2006 is 130 and the number of surplus places has grown to 78 (37.5% surplus places). With these low numbers, the school budget would not be sufficient to meet the costs of the staffing, supplies and services and accommodation. The potential saving of one headteacher post through a federation or similar arrangement would not be sufficient to meet the overall costs of provision. Inevitably, the quality of provision would be affected as additional reductions to staffing would increase class sizes and require mixed age and probably mixed key stage teaching. The money available for supplies and services and accommodation would also be reduced to balance the budget with additional impact on the quality of provision. Federation could not achieve significant reductions in revenue costs or improve accommodation at Beauty Bank.

If the capacity were reduced at Beauty Bank to match the demand for places the financial pressures still exist. The budget is calculated on the number of pupils attending and this will continue to fall. The money available on staffing, supplies and services and accommodation will reduce with the inevitable impact on quality of provision, class sizes and staff workloads. It is possible to use spare accommodation for other purposes to offset the overall costs of maintaining the site. However, the opportunities for joint use of the site are limited by the capacity of the local area to meet the market costs of accommodation. In terms of the multiple deprivation index the local area is ranked as one of highest in Dudley. There is little potential to provide the level of additional income that the school would need. There are also limitations regarding the nature of additional uses due to the likelihood of close contact with children and their families. Vehicle access and parking are also limited. There is no realistic possibility of reducing the capacity and securing sufficient income to cover the total costs of providing the quality of education to which children are entitled.

The nearest schools were also considered for closure, capacity reduction and amalgamation. All of the nearby primary schools have more pupils than Beauty Bank. Four of the five at least twice and many pupils. Two of the schools will have their capacity reduced. Any further reductions in capacity across the area would have a greater affect on a larger number of pupils and their families in

terms of disruption and preference for places and could not guarantee that parents would send their children to Beauty Bank.

Closure of any other schools in the area would have created a shortage of places in the area, more travel for more families and resulted in additional costs.

The proposal to close Beauty Bank Primary will enable all of the pupils in the local area to attend a larger school with a broader range of staff expertise and facilities.

2.27 Employees

In previous reorganisations there have been no compulsory redundancies in Dudley. Similarly, there is no anticipated requirement for compulsory redundancies arising from the Primary Schools Review. Every effort will be made to redeploy existing staff within the partner school (Greenfields Primary), other schools within Dudley or to opportunities that exist across the wider council or elsewhere. Given the turnover rates in the various job roles within schools, it is expected that all staff who wish to continue employment in other schools will be able to do so.

3. **ASSESSMENT OF THE PROPOSAL**

The School Organisation Committee in assessing this proposal should consider the following: -

- The Secretary of State's Guidance for Decision Makers on Statutory Proposals
- The views expressed during the Consultation Process regarding this Proposal particularly from Governors, Staff and Parents of pupils attending or intending to attend Beauty Bank Primary School
- The Borough's School Organisation Plan
- Equal opportunities, Race Discrimination, Disability Discrimination and Human Rights Aspects
- Any other relevant factors concerning these specific proposals

In addressing these factors this report follows the Secretary of State's Guidance and applies that Guidance where relevant and appropriate.

It is intended that the thrust of the substantial objections to this proposal will be represented firstly within the body of this report, but for completeness, on pages 32 to 53 is a summary of each of the individual objections raised together with the Directorate of Children's Services response. Further, all of the objection letters, together with correspondence arising from the consultation process are being copied to members of the Committee.

EFFECT ON STANDARDS AND CONTRIBUTION TO SCHOOL IMPROVEMENT

In this respect the following factors are identified: -

- Whether the proposals will improve the standards, quality, range and/or diversity of educational provision in the area;
 - The standards of education in existing and proposed alternative provision, and, particularly in the case of nursery schools, that the alternative provision will be able to maintain or enhance the standards of education provision;
 - The effect of the proposals on other institutions
1. The opportunity for the integration of Beauty Bank school pupils into Greenfield primary school will enable pupils to access a wider curricular provision.
 2. Pupils attending the new enlarged Greenfield school would have the added benefit of having all their education from 3 – 11 in the same establishment, with all of the continuity and other benefits such as brothers and sisters in the same school.
 3. Following the consultation, pupils whose parents would wish to transfer their children to another school in the area would be able to do so. This would allow them to exercise parental preference in their choice of school.
 4. The Directorate of Children's Services believes that the education provision that will be available at Greenfield school would be of good quality as evidenced in OFSTED inspection.
 5. Closing Beauty Bank Primary School and increasing capacity at Greenfield Primary School will ensure all children have access to continuous education from 3 - 11, well-trained staff, and improved resources. However, if parents wish their children to transfer to an alternative school then all of the schools in the local area where there are places would be willing to accommodate them.

STANDARD OF ACCOMMODATION AND CONDITION OF FACILITIES

1. The building occupied by Beauty Bank Primary School was erected inter-war with additional teaching areas and ancillary areas and a temporary classroom built post 1976. The latest condition survey, carried out in May 2002, identified necessary repairs amounting to £73,000 with £5,400 of this to be carried out

within 2 years. This is not a significant total when compared to many schools and reflects the overall quality of stewardship exercised by schools and Dudley Council over the years.

Outstanding repairs listed;

Priority 2:

Roofs

Floors and Stairs £250.00

External Walls and Doors £4,465.00

Electrical Services £685.00

TOTAL Priority 2 £5,400.00

Priority 3:

Roofs £15,300.00

Floors and Stairs £4,300.00

Ceilings £1,100.00

External Walls and Doors £3,000.00

Fixed Furniture and Equipment £800.00

Redecorations £43,100.00

TOTAL Priority 3 £67,600.00

Even if all of the repairs identified were carried out, a significant number of areas of the building would remain unsuitable for the purpose as defined using DfES suitability criteria. The school's suitability survey identifies several areas of the building as 'unsuitable'. The suitability survey grades rooms / areas according to the detrimental effect they have on education in the premises in the following ways:

Category A - Unable to teach curriculum

Category B - Teaching methods inhibited

Category C - Management or organisation of school affected adversely

Category D - Pupil or staff morale or pupil behaviour affected adversely

Beauty Bank Primary School has a significant number of areas in categories B, C and D:

Mobile Classroom too small, no water, no toilets B

SEN work carried out in inappropriate areas B

Staff room too small and no workspace B

Teaching space used for storage	B
Lack of toilet provision, 4 toilets for 60 pupils	C
Small sized Hall	C
No separate storage for PE equipment	C
Solar heat gain & lack of ventilation to four classrooms	D
All of the points above were reached in collaboration with and agreed by the school staff.	

2. Proposal for Consolidation Of Greenfield Primary School Onto A Single Site

Dudley Council has identified in its proposals that Beauty Bank Primary School will close with effect from August 2006. The Beauty Bank Primary School buildings will continue to be used as additional accommodation for Greenfield Primary School for an initial period before consolidation onto a single site.

The principles underpinning this proposal will enable children attending both schools now and in the future year groups to access the best and most appropriate education within the resources available to the Council. It is anticipated that parents will be able to use the Beauty Bank annexe for at least the next 3 or four years until the school can be consolidated onto a single site.

During this period, the Council will explore and identify through option appraisal work appropriate alternative sites for a new 420 place school and the resources to ensure that this can take place. Children, parents, staff and Governors of both existing school sites will be engaged in the design of a new school whilst ensuring that appropriate and sufficient accommodation will be provided and that all new build proposals will adhere to the design guidance issued by the Department for Education and Skills (DFES). Teaching and learning will be delivered in all parts of the curriculum in spaces of appropriate size, location and with the correct furniture and equipment therefore addressing the suitability issues identified at Beauty Bank Primary School.

Funding opportunities for the project are being explored through capital routes such as Targeted Capital Fund (TCF) Department for Skills and Education bidding opportunities, Building Schools for the Future (BSF) and utilising Basic Need formula capital grant and New Pupil Places formula capital grant awarded by DfES with allocations for future years to be announced shortly.

This scheme is consistent with the stated aims of removing surplus places whilst creating a pattern of sustainable school and improved facilities wherever possible.

NEED FOR PLACES

In assessing the level of need the Guidance directs decision makers to consider: -

- The overall supply and likely future demand for places;
- Whether there is sufficient capacity to accommodate displaced pupils in the area;
- Whether the proposals will reduce the proportion of denominational places.

Schools with a large number of surplus places or high-cost maintenance buildings use up valuable funding unnecessarily and there are no added benefits to pupils. The Directorate has undertaken this review of primary provision in Dudley to achieve maximum efficiency and, therefore, maximum effectiveness by ensuring resources are used primarily to deliver the curriculum and educate its pupils.

Dudley has managed numerous changes to the pattern of schooling at several critical points over the last 60 years. Political, educational and demographic changes have led to the building of new schools, changing their sizes and closing schools. Dudley is now facing again the need to change and, with the benefit of much better information, can respond with a degree of certainty to meet the needs of children for the next 20 – 30 years.

The surplus of places in the Borough's primary schools was highlighted in an external consultancy report by KPMG in 1999, and in the OFSTED Inspection Reports of 2000 and 2002. The more general outcomes of the OFSTED inspection in 2000 caused a delay in the implementation of a full review and action plan, although the need for such a review featured in the Post OFSTED Action Plan in 2000 and 2002.

Consultation on specific school proposals was carried out in 2002. Responses were received from Headteachers, governors, councillors, parents and others. The consultation led to action in several cases including further consultation on the establishment of a new Voluntary Aided (VA) school for Halesowen to replace two existing schools.

The annual birth rates (using academic year September - March) in Dudley have reduced from 4,116 in 1990 to 3,344 in 2003. There was a slight increase to 3,514 in 2004 but long-term projections indicate births of around 3,300. The DfES sets the minimum education budget for Dudley based on the number of pupils attending its schools. As the demand for places falls, schools will receive proportionately lower budgets, adding significantly to the difficulty for schools of meeting the costs of the quality of education to which all pupils are entitled.

Based on the numbers of children already born, primary pupil numbers in Dudley schools are projected to fall by a further 2,358 (almost 10%) between 2005 and 2010. The reduction of 2,358 primary pupils will lead to an annual fall in the Council's revenue grant funding from the DfES and a reduction of £7.8m by 2010, at current prices. The figure of £7.8m is based upon a current 'per pupil' unit funding of £3,329, the DfES baseline assessment for a 'Dudley' pupil in 2005 which will be applied for calculation of the Dedicated Schools Grant (DSG) for 2006 onwards. This data has just been released by the DfES to enable the Council to model future budget scenarios in confidence.

The primary sector delegated budget in the current financial year is £71.3m or 49% of the total resources delegated to schools. If the current provision of 82 primary schools were maintained with 2,358 fewer primary pupil places, it is estimated that each primary school budget would be reduced by an average of 10% by 2010. Individual primary school budgets currently range from £0.5m to £1.9m. Therefore schools could expect to see an average annual budget reduction ranging from £50,000 to £190,000 by 2010. With a projected 5,000 surplus places in the system some schools would experience much greater reductions and also considerable year-on-year instability. This is not in the best interests of children.

Dudley primary schools currently spend their delegated resources in the following proportions:

- Staff 83%
- Premises 6%
- Supplies and services 11%

Premises costs are largely fixed and there is limited scope for reductions in services, learning materials and other supplies. The main focus for balancing budgets is therefore likely to be in the largest area of expenditure, which is staffing. If the £7.8m reduction were directed at staffing in primary schools, this would equate to an indicative reduction of 230 posts in schools, or more than 10% of the current workforce in primary schools.

It has now become imperative to take action to ensure that the pattern of primary school provision is cost effective, with only sufficient surplus places to allow a degree of parental preference and in order to cope with any unplanned expansion. It is important to say that these proposals will affect every primary school in the Borough, ensuring that money is not wasted on maintaining surplus places but directed to the education of children.

The very high number of surplus places locks in substantial resources. These proposals will unlock these resources and enable schools to make better use of money already

available. This will allow a switch of money from surplus places to other areas such as staffing, accommodation or learning resources.

The costs of larger accommodation changes will be met from Dudley's Capital Programme and successful applications for government funding for new schools. Dudley has already succeeded in securing millions of pounds for building and modernising schools. The government has recently announced a massive increase in the level of funding available for new primary schools and Dudley will be well placed to take advantage of this new opportunity.

There will be sufficient places in local schools for children displaced from closing schools. In some cases this will require additional accommodation and this is being planned now. There will be no certainty in numbers until parents express preferences for places in other schools. The accommodation changes will be planned to make sure there are enough places in the right schools at the right time – that is from September 2006 and in subsequent years.

Whilst parents have yet to indicate their preference, there is no suggestion that the local denominational schools will be adversely affected in any way by these proposals.

FINANCE

In relation to the financial effects of the proposal the Secretary of State's Guidance requires the Committee to consider the following: -

- Whether the proposals represent a cost-effective use of public funds;
- Whether the capital resources required are available
- Whether the sale proceeds of redundant sites are to be made available and whether the Secretary of State's consent has been obtained where necessary.

Revenue funding

In 2005/06, Beauty Bank received delegated funding via the Fair Funding Formula of £513,703, Standards Fund Grants of £45,688 and Schools Standards Grant of £20,000.

A significant proportion of this funding is likely to follow pupils as they are re-located, but non-pupil led funding will be available for re-distribution within the ISB following the closure of the school.

For 2006/07, 7/12^{ths} of these allocations are estimated to be approximately £84,000 and could be re-distributed within the Individual Schools Budget if the Beauty Bank site ceased to exist from 1st September 2006. However, as the Beauty Bank site is likely to

remain open until additional capacity at Greenfield is available, then first call on these funds will be required to cover premises costs incurred by the Beauty Bank site until its final closure.

In a full year, the effect of these non-pupil led allocations is estimated to be approximately £144,000.

Capital funding

At December 2005, Beauty Bank held a balance of uncommitted devolved formula capital of £7,000. If this remains unspent, it can be used by the LEA on other priority capital works at schools, including any of the local schools requiring expenditure to accommodate Beauty Bank pupils.

The projected allocation of devolved formula capital for Beauty Bank Primary School for financial year 2006/07 is £26,333 and £28,139 for 2007/08 based on current number on roll. Whilst the full allocation would be available if no further works are carried out up to the date of closure, as it is proposed that the buildings remain as additional accommodation until a new school has been built. The current buildings need to be maintained to an acceptable level so expenditure of some of this grant may be required. As the allocations are based on projected number on roll, the actual amount will not be known until each financial year.

Unit Cost Comparison

The unit cost per pupil at Beauty Bank for 2005/06 was £3,616 compared with the average unit cost per pupil for the primary sector of £2,572. This represents an increase of 29% above the average unit cost and poor value for money. These high revenue costs are not sustainable.

Reserves

At December 2005 Beauty Bank had reserve balances of £43,794.

Use of Capital Receipts

The Council at its meeting on 18th July 2005 resolved that “the use of capital receipts, arising from the implementation of specific proposals under the review of the Primary Schools sector for utilisation to help ensure that all Primary School education takes place in high quality buildings, as referred to in paragraph 2.6.1 of the report, to be approved and included in the Capital Programme.”

Proceeds of Redundant Site

This proposal is not dependant on the proceeds from the sale of Beauty Bank or any other site. There is no requirement therefore to include this as a financial consideration or to obtain Secretary of State consent.

VIEWS OF INTERESTED PARTIES

Clearly the Committee must have regard to the wide range of views that have been expressed in relation to this proposal.

Approach to the Consultation

Background

The surplus places in the Borough's primary schools were highlighted in an external consultancy report by KPMG in 1999, and in the OFSTED Inspection Reports of 2000 and 2002. The wider outcomes of the OFSTED inspection in 2000 caused a delay in the implementation of a full review and action plan, although the need for such a review featured in the Post OFSTED Action Plan in 2000 and 2002.

Consultation on specific school proposals was carried out in 2002. Responses were received from Headteachers, governors, councillors, parents and others. The consultation led to action in several cases including further consultation on the establishment of a new Voluntary Aided (VA) school for Halesowen. These actions partially addressed the situation but much more remained to be done.

By 2004, the need for action was becoming critical. A further process was initiated as part of the planning framework Learning for the Future. This process was supported by detailed preparation and a further consultation on specific school proposals. Learning for the Future: Primary Schools Review Consultation Document sets out proposals to change the provision of primary school places. The proposals have developed from:

- Consultation on specific school proposals in 2002;
- Further consultation on Halesowen CE and Hasbury CE Primary school proposals;
- Primary Review Refresh 2004 consultation on principles and statements of intent;
- Briefing meetings with Headteachers, governors and councillors during February and March 2005;
- Further consultation in June and July 2005 with Headteachers, chairs of governors and councillors on the approach to further consultation on school specific proposals.

(Additional information to inform the process was posted on the Dudley Website)

Initial Consultation 12 September – 21 October

Following a decision to start consultation on primary school review proposals a series of meetings were held with individual Headteachers to support the process of informing staff, parents and children. Letters were sent to all parents informing them of the start of the consultation and details of consultation meetings. Copies of the Consultation Document were available in schools from 12 September 2005 and posted on the Dudley Council website. Briefings were also arranged for Union representatives, Members of Parliament and the media.

A copy of the consultation document was sent to the Directorate of Education and Lifelong Learning's consultees, which includes all schools in Dudley, their Headteachers and chairs of Governing Bodies, Dudley MBC Councillors and key partnering agencies. In addition a letter of invitation was extended to all parents to make a response through the questionnaire copies of which were distributed to every school and further copies available on request. Copies of the documents were also published on the Dudley Council website.

Within the consultation document was a questionnaire that asked five questions. Four questions required a 'yes or no' answer and question 5 was open ended. There was also space for comments in questions 1 – 4 and respondents were invited to attach additional information. Additional information provided by respondents included:

- DVD presentations;
- letters;
- emails;
- petitions;
- photographs;
- telephone discussions.

All responses have been entered onto a database to assist with analysis and all original submissions have been retained. The consultation document was published on 12 September 2005. This stage of the consultation ended at 5pm on Friday 21 October 2005.

Consultation meetings were arranged for staff, governors and parents in separate meetings at each of the following schools:

- Beauty Bank;
- Highfields;
- Holt Farm;

- Sycamore Green;
- Mount Pleasant;
- Maidensbridge;
- Thorns.

Each meeting began with a presentation covering the background, main issues and specific details for the school. Questions were taken and answered where possible. Attendees were also able to record questions in writing for response after the meetings. Notes of all meetings were taken to assist with the consultation and the public record.

Information was posted on the Dudley Council website. As new questions were raised, the website was updated. This was essential to enable access to the very high volume of information available from Dudley, the DfES, ONS and other sources. Paper copies would also be provided for anyone that could not access information electronically.

The consultation document also made clear that information could be available in large print or other languages on request. No requests were received during the consultation period. For those individuals without personal Internet access facilities in schools and libraries were available.

Respondents

11,000 questionnaires were made available to schools and the normal Dudley Consultees. The questionnaire was also posted on the Dudley Council website. In total there were 778 individual questionnaire responses received. In addition to this the following form of response was made:

- Letters 318
- Petitions 9
- Email 425
- Questions asked during Consultation 99

Number of Questionnaires Issued	11,000
Number of Responses Received	778
Response Rate	7.07%
Pupil / Student	6
Parent / Carer	540
Headteacher	28
Governor	69
Other School Body Rep	56

Councillors	2
Trades Union Rep	4
Other	39
Not Stated	34

The views of parents and other local residents, including those who may be particularly affected by the proposals or have a particular interest in them

Every response has been entered on a database and the originals have been retained. The record of evidence, that is all submissions, is available to view on request by appointment. The following is a commentary on the responses with statistics summarising the breakdown of the respondents.

There were a total of 778 responses. Of these, 126 respondents made general comments or no comments. Responses were received with reference to 73 of the 82 primary schools. The 126 respondents in the 'none' category gave a higher 'yes' response to all questions.

The highest number of responses (386 almost 50% of total question responses) came from schools where either closure or amalgamation was proposed. The 'no' percentage responses from this group tended to be higher than the 'yes' responses for questions 1, 3, and 4.

Similarly the remaining 169 respondents from representatives of schools where there were no changes proposed or an adjustment in admission numbers, gave a higher 'yes' response.

Question 1

Do you agree with the case for changing the current pattern of primary schools as described in paragraphs 5 - 10.

Question 1 by description of respondent

Description of Respondent	Total	Yes	No	Unanswered	% Yes Total	% No Total	% Unanswered
Pupil/Student	6	3	2	1	50.0%	33.3%	16.7%
Parent/Carer	540	151	367	22	28.0%	68.0%	4.1%
Headteacher	28	21	6	1	75.0%	21.4%	3.6%
Governor	69	37	26	6	53.6%	37.7%	8.7%
Other school body rep	56	24	29	3	42.9%	51.8%	5.4%
Councillors	2	1	1	0	50.0%	50.0%	0.0%

Trade Union Rep	4	0	4	0	0.0%	100.0%	0.0%
Other	39	16	20	3	41.0%	51.3%	7.7%
Not Stated	34	5	21	8	14.7%	61.8%	23.5%
	778	258	476	44	33.2%	61.2%	5.65%

Question 2

Do you agree with re-investing resources released back into education?

Question 2 by description of respondent

Description of Respondent	Total	Yes	No	Unanswered	% Yes Total	% No Total	% Unanswered
Pupil/Student	6	4	1	1	66.7%	16.7%	16.7%
Parent/Carer	540	341	150	49	63.1%	27.8%	9.1%
Headteacher	28	25	1	2	89.3%	3.6%	7.1%
Governor	69	54	8	7	78.3%	11.6%	10.1%
Other school body rep	56	36	13	7	64.3%	23.2%	12.5%
Councillors	2	2	0	0	100.0%	0.0%	0.0%
Trade Union Rep	4	2	1	1	50.0%	25.0%	25.0%
Other	39	24	12	3	61.5%	30.8%	7.7%
Not Stated	34	8	15	11	23.5%	44.1%	32.4%
	778	496	201	81	63.8%	25.8%	10.4%

Question 3

Do you agree with the overall approach based on reducing the number of primary schools?

Question 3 by description of respondent

Description of Respondent	Total	Yes	No	Unanswered	% Yes Total	% No Total	% Unanswered
Pupil/Student	6	2	2	2	33.3%	33.3%	33.3%
Parent/Carer	540	79	441	20	14.6%	81.7%	3.7%
Headteacher	28	18	8	2	64.3%	28.6%	7.1%
Governor	69	32	35	2	46.4%	50.7%	2.9%
Other school	56	16	36	4	28.6%	64.3%	7.1%

body rep							
Councillors	2	1	1	0	50.0%	50.0%	0.0%
Trade Union Rep	4	1	3	0	25.0%	75.0%	0.0%
Other	39	13	23	3	33.3%	59.0%	7.7%
Not Stated	34	2	31	1	5.9%	91.2%	2.9%
	778	164	580	34	21.1%	74.6%	4.4%

Question 4

Do you agree with the approach to achieve sufficient local places for local children by reducing the number of places in schools with surplus places and small increases in others to reflect local demand?

Question 4 by description of respondent

Description of Respondent	Total	Yes	No	Unanswered	% Yes Total	% No Total	% Unanswered
Pupil/Student	6	3	2	1	50.0%	33.3%	16.7%
Parent/Carer	540	141	369	30	26.1%	68.3%	5.6%
Headteacher	28	17	6	5	60.7%	21.4%	17.9%
Governor	69	34	29	6	49.3%	42.0%	8.7%
Other school body rep	56	19	33	4	33.9%	58.9%	7.1%
Councillors	2	1	1	0	50.0%	50.0%	0.0%
Trade Union Rep	4	1	3	0	25.0%	75.0%	0.0%
Other	39	12	23	4	30.8%	59.0%	10.3%
Not Stated	34	4	28	2	11.8%	82.4%	5.9%
	778	232	494	52	29.8%	63.5%	6.7%

Commentary

Response to Question 2 was positive in every category of respondent. Conversely responses were negative overall for the other 3 questions. There is also a distinct difference of view between the responses of parents and carers particularly those directly affected by the proposals and those of Headteachers generally. The responses should be interpreted with considerable care.

By far the largest number of respondents were parents or carers totalling 540 out of 778 responses. This is not unsurprising as they form the largest body of those involved in the consultation process. The highest number of parent/carers responses came from schools

where closure or amalgamation was proposed and their responses were primarily 'no'. This situation was mirrored in the 'Other School Body Representatives' which was mainly made up of teaching staff.

Where parent/carers children do not attend schools identified for closure or amalgamation the response is very small with the vast majority of deciding not to respond. Again this was mirrored in the 'Other School Body Rep'.

Twenty-eight of the Headteachers responded and whilst this is a proportionally small number a high percentage supported by the educational arguments and indicated 'yes' in response to all 4 questions. A total of 69 governors made up of 41 individual governors and 28 governing body representatives responded and their views were generally closely divided between those who ticked 'yes' and those who ticked 'no' in three out of four questions.

Non - Questionnaire Responses to the Consultation

Petitions

School Petition	Title	No. of Signatures
Blowers Green	As a parent of a child/children who attend Blowers Green Primary School, I wish to support the Governors in their opposition to the proposals set out in the Primary School Review to reduce the School's Standards Number from 45 to 30.	117
Mount Pleasant	Leave Mount Pleasant Primary School Alone 156 Netherton CE We the undersigned would like to oppose the proposal for Netherton CE Primary School to reduce the admission number from 60 to 30.	210
Maidensbridge	We, the undersigned, oppose the closure of Maidensbridge Primary School.	15,978
Highfields	As you may know there are proposals to close the school and expand Christ Church and Wallbrook schools. If you object to the closure of Highfields in August 2006 please add your name to the petition.	66
Mount Pleasant	The names listed below support the attached letter regarding the proposed closure of Mount	47

	Pleasant Primary School (Home & School Association)	
Holt Farm	Save Holt Farm School Now. Our Children are the future so lets save their school from closure. They are more important that a statistic on a balance sheet. Sign the petition now.	5,332
Beauty Bank	We the undersigned give our support to Beauty Bank Primary School. It is a good school, educating our children to a high standard. It has friendly, approachable staff and it is wrong to close it, disrupting the children's education.	10,319
Highfields	As you may know there are proposals to close the school and expand Christ Church and Wallbrook schools. If you object to the closure of Highfields in August 2006 please add your name to the petition.	5,749
Sycamore Green	Save our School	4,000

Letters

Three hundred and seventeen letters have been received and entered on the database. Where requested a detailed response has been given. On some occasions the response has referred the writer to Dudley Council website where answers to questions are available.

Questions

The 99 questions raised at or as a result of the consultation process have been addressed in the same way as the letters.

Emails

There have been a substantial number of emails sent to the school organisation address. A substantial number of emails have also been sent to councillors or officers. All of these have been added to the record of evidence.

The elected members on the Cabinet took the decision to support the proposal and move to the publication of Statutory Notices for closure of the school.

A statutory notice for closure was published on 21 November 2005 and is included in the Prescribed Information.

Representation Period

During the representation period, 15 letters of objection were received by the Directorate of Children's Services, all in opposition to closure, setting out reasons and asking further questions. Some were signed by individuals and some by groups of people such as parents / carers.

These letters were logged according to recipient details immediately and acknowledged by the Directorate. The content of each letter was summarized and separate points of objection noted. Individual points of objection or query amounted to 50.

All of the representations, along with the Directorate's response to the objections lodged were copied to the Secretary to the School Organisation Committee, in accordance with Statutory Guidance. The letters are being copied to members of the Committee.

Parents and other local residents have expressed their opposition to the closure of Beauty Bank Primary School. The strength of the views is emphasised by the number of objections and their detailed nature.

The views of any Local Education Authority affected by the proposals or with an interest

The views of neighbouring Local Education Authorities have not been fully presented. There is however liaison between Senior Officers and each of the neighbouring authorities is aware of the DfES expectation of cross-border co-operation in planning school places and bids for capital investment.

The views of the Early Years Development and Childcare Partnership

Dudley EYDC Partnership, although not formally dissolved, has in practice had its role subsumed into the work of the Children & Young People's Partnership in relation to strategic planning and delivery of early years and childcare services.

In relation to Beauty Bank there is currently a maintained early education provision for under 5's on the site, consisting of 60 part time places. There is no out of school childcare on site. Closure would adversely impact on existing services by reducing the number of early education places for 3 & 4 year olds available in the area. In this respect a local audit is being conducted to ensure there are sufficient early education places available elsewhere within reasonable proximity to meet the needs of children who

would be likely to use Beauty Bank nursery. The nearest maintained nursery provision would be at Gig Mill or Rufford Primary schools, which is a considerable distance away from Beauty Bank. The Council has a statutory responsibility to ensure that there are sufficient places in the Borough for all eligible 3 & 4 year olds. The proposal to continue using the Beauty Bank buildings as additional accommodation for Greenfield primary School will take account of this requirement.

Other Issues

The Guidance identifies a number of further aspects to be considered and it must be recognised that the Committee must consider this proposal on its own merits.

The length and nature of journeys to alternative provision

The radius of one mile for alternative provision is considered to be reasonable.

The recommended maximum walking distance to schools for Primary aged children is two miles. The Education Authority, for the purpose of this proposal, has identified a key threshold of one mile.

All of the pupils' home addresses have been plotted by Geographical Information System (GIS) and the distances to alternative provision for each child calculated as shown in the following table:

Distance* pupils travel to Beauty Bank Primary								
	No. of pupils in GIS (Jan 2005)	No. of pupils within 0.5 mile	%	No. of pupils within 0.51 to 1 mile	%	No. of pupils over 1 mile	%	
Beauty Bank	133	82	62%	35	26%	16	12%	
Distance* of pupils to alternative schools								
Alternative schools	Beauty Bank pupil addresses (Jan 2005)	No. of pupils within 0.5 mile	%	No. of pupils within 0.51 to 1 mile	%	No. of pupils over 1 mile	%	No. (and %) of pupils over 1 mile where alternative is also over 1 mile
Greenfield	133	68	51%	43	32%	22	17%	16 (12%)
Amblecote	133	8	6%	97	73%	28	21%	16 (12%)
Gig Mill	133	9	7%	78	59%	46	34%	16 (12%)
St James's CE	133	4	3%	84	63%	45	34%	16 (12%)
* Due to the no. of addresses involved, distance is measured via straight line and not via specified walking route								

Analysis of the distance travelled by 133 pupils attending Beauty Bank Primary (as at Jan 2005) indicates that 62% of pupils live within half a mile, and 88% of pupils live within 1 mile of the school. The impact of these pupils travelling to the alternative schools is not as significant in terms of additional distance as might first appear. 83% of pupils live within 1 mile of Greenfield Primary. This figure decreases to 79% for Amblecote and 66% for Gig Mill and St. James's Primary schools respectively. Further analysis shows that 16 pupils live greater than 1 mile from one of the 4 alternative schools, which is exactly the same number of pupils who live greater than 1 mile from Beauty Bank.

Any sex, race or disability discrimination issues or other human rights issues

The Council has appropriate policies in place and is committed to compliance with the law in relation to the Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995 in respect of all of its schools.

Dudley Council supports a highly inclusive policy in its schools and is striving to upgrade the facilities wherever possible with the aim of having as many fully accessible schools as possible in order to satisfy local need. However, this is easier in some cases than others.

So far as disability is concerned, all of the school buildings in the local area have been surveyed by the Special Educational Needs Team as to the accessibility and requirements to bring them up to full accessibility.

Many of the schools on the list have a high degree of wheelchair accessibility within the building, i.e. teaching areas, toilets and other areas accessed by children, making them more suitable for disabled pupils. The Department of Children's Services would therefore recommend those schools to parents of disabled children (requiring the use of a wheelchair or other mobility aids). In addition, many of the alternative schools have better access to the building itself, making them more suitable for disabled access to public areas and the school in general.

All of the new accommodation will be fully compliant with legislation covering disability including 100% wheelchair accessibility.

Human Rights

Article 2 of the First Protocol to the European Convention on Human Rights (the Convention) provides that: -

"No person shall be denied the right to education. In the exercise of any functions which it assumes in relation to education and to teaching, the State shall respect the rights of parents to ensure such education and teaching in conformity with their own religious and philosophical convictions".

The United Kingdom has a reservation to this Article which reads: -

"...the principle affirmed in the second sentence of Protocol 1, Article 2 is accepted by the United Kingdom only so far as it is compatible with the provision of efficient instruction and training and the avoidance of unreasonable public expenditure".

Article 2 leaves the structure and funding of public education to the state's discretion. Similarly it does not prescribe the content or purpose of the education that is to be provided and nor does it guarantee access to a particular educational institution or standard of education.

Furthermore, the Convention right to education is not fixed in content but takes the form of the provision made by each member state. The proposal will not bring about a denial of access to education provided for in the statute law of England and Wales.

Individual Cases

Whilst it is the Education Authority's position that there are no discrimination or human rights issues which are of such significance as to call into question this proposal, it is accepted that the effect of the proposal could cause specific individual hardship or difficulties and the Council is committed to addressing each such situation on its own merits.

The effect of the proposal on infant class sizes

In the context of a surplus of infant class places and the preparedness of Greenfield Primary school and other surrounding schools to accommodate all pupils currently at Beauty Primary it is considered that there will be no adverse effect on infant class sizes by this proposal.

The overall effect of a closure on the local community, particularly in areas receiving funding as part of regeneration activity

The use of the schools facilities have been considered community groups that currently use the school will be supported to continue their activities within existing provision in the neighbourhood. This may include the Beauty Bank site.

4. EDUCATION DEPARTMENT RESPONSE

The Education Department's responses to the points of objection and comments or queries in the letters are as follows:

1 Greenfield Primary parents, staff and governors only found out about the plan to make Beauty Bank an annex of Greenfield Primary through the local press. Why were we not informed properly in a reasonable amount of time?

The proposal to use the Beauty Bank buildings as additional accommodation for Greenfield Primary School arose from concerns raised during the initial consultation about the immediate impact on Beauty Bank children, parents and staff and on the accommodation at Greenfield Primary. The alternative proposal which developed into the annex of additional accommodation proposal was received towards the end of the consultation period and there was no time for additional consultation with Greenfield parents. When the initial consultation began on 12 September the Director of Children's Services wrote to all parents to inform them of the consultation starting. Regrettably, there was not enough time between the Cabinet Member and the Director agreeing the recommendations to Cabinet and the Cabinet meeting to inform parents in the same way.

Experience of earlier consultations shows the importance of being able to provide parents, staff and governors with additional details of what a proposal means. These additional details required discussion and commitment from Headteachers, Chairs of Governors and subsequently governing bodies before there was sufficient detail about the proposals to share more widely. Immediately after the Cabinet meeting on 17 November thirteen meetings were organised with the Heads and Chairs of the schools proposed for closure and with the schools named in an “annex” relationship and in some cases more than one meeting was required. These meetings were critical in explaining how the proposals might work, where authority for decision making would lie and what it would mean for children, parents, staff, governors and others. Where there was sufficient interest Governing Body meetings were convened. The Greenfield Governing Body was interested in supporting the proposal but were seeking some assurances from Dudley Council and wished to consult their parents before giving a commitment. All of this took place during an extremely busy time for schools as they prepare for and enjoy the Christmas festivities.

The meeting with Greenfield Governing Body was held on the 5 December and the subsequent meeting for Greenfield parents was organised as quickly as possible on 15 December. There will be further opportunities to discuss the details as they develop subject to School Organisation Committee decisions.

The Governing Body asked parents to give their views on
Proposal 1 – Increase admission number from 40 to 45 with extra classrooms to be built on the Greenfield site (original proposal)
Proposal 2 – Annex Beauty Bank with Greenfield Primary and consolidate on a new site in 3 – 5 years.
Proposal 3 – I am willing to support the Governing Body in its final decision.

Of the 92 returns received

- 59 opted for Proposal 2 – in support of the current Beauty Bank proposal
- 19 opted for Proposal 1 – in support of the original increase on the Greenfields site
- 8 supported the Governing Body in its final decision
- 6 gave either a mixed response or stated that they did not have enough information to respond.

After consultation with their parents revealed the majority were in support of the proposals Greenfield Governing Body gave their commitment in writing on 20 December which is included in the annex.

2 Due to Council members not being available for meetings to discuss the implications of your proposals, Greenfield parents were only given a few days to formally respond to the consultation and left little time to digest the information and for the proposals to be considered.

Please see response to point 1. Senior officers made every effort to arrange meetings as early as possible. From the Cabinet meeting on 17 November there were very few working days left in the autumn term to arrange a series of meetings involving Heads and Chairs, Governors and parents. These arrangements also had to fit in with school commitments during one of the very busiest times for primary schools.

- 3 **Greenfield Primary is already over subscribed and is very short on space. Raising the admission numbers will only make this worse. The location means access is already difficult and there is inadequate playground space as it is. There is no room for expansion. Parents may no longer choose to send their children to a crowded school therefore affecting the intake to Greenfield.**

Greenfield Primary has capacity for 280 places. The number of children attending since 1997 has been slightly above or slightly below this figure. The school is under pressure for its accommodation and external areas. The building was designed relatively recently but does not include some of the facilities that are required to meet the needs of all children in 21st century learning. For example, there is dual use of the hall area for school meals that prevents its use for other purposes at times of the day and there are too few spaces for small group or individual support. The proposal to build a new school with 420 places will ensure that all of the accommodation and external areas are fit for purpose and support every aspect of learning and personal development. The proposal to continue on two sites will minimise disruption on both sites and enable every opportunity for learning from the process of creating a new school to be taken. This will be a powerful process for learning and building a stronger community.

- 4 **It is uneconomical to keep Beauty Bank open as an annex even with an additional grant. Can you provide details of funding in order for the annex to be implemented successfully and, more importantly, sustained?**

Beauty Bank will receive funding based on the number of pupils from April to August along with additional elements such as for premises. Greenfield Primary will receive funding on the same basis but based on a larger number of pupils. From September to March 2007 Greenfield will receive the funding for the total number of pupils and the funding for both sets of premises. The Education Finance team will provide accountancy support for both schools during this period. The precise details of the funding including the small schools allowance currently in the formula will be confirmed when the January 2006 pupil count is verified and the government grant is applied through the funding formula for schools. This should be completed in February.

As the pupil numbers drop at Beauty Bank there will not be sufficient income to pay for existing levels of staffing, supplies and services and accommodation. This will be addressed by Dudley Council over the next few weeks and months in collaboration with Beauty Bank and Greenfield Schools to ensure that the proposal is implemented successfully.

- 5 **The annex will dilute the leadership and management of Greenfield Primary**

as the workload will increase significantly. It took two leadership teams before so how can you expect one to cope? Especially with a distance of half a mile between the two schools.

Schools Forum a group established to advise the Director of Children's Services on financial matters agreed in December to provide additional funding to support the management of schools proposed for closure and for those involved in an annex arrangement. This means that Greenfields and Beauty Bank will each receive an additional £40k to meet the extra demands on management capacity. In addition to this a project manager will be assigned to the school to ensure that the work required in closing Beauty Bank, preparing for increased capacity in September and the capital programme will be supported.

- 6 The excellent ethos, standards and atmosphere of Greenfield Primary will be ruined if it becomes a split site school. At present Beauty Bank and Greenfield both have very different catchment areas with very different needs.**

Beauty Bank and Greenfield Schools have significant strengths. The proposal to increase in size will enable more opportunities for professional dialogue and to learn from each other. The proposals provide a powerful opportunity to grow both professionally and as a community. This will be a major contribution to securing improved outcomes for children as set out in Every Child Matters.

- 7 If Beauty Bank does become an annex of Greenfield does this mean that Greenfield children and staff could be moved to the Beauty Bank site to even out class numbers? Won't this have a detrimental effect on the teaching standards and education?**

Over the next few weeks detailed discussions will take place between Greenfields Primary and Beauty Bank regarding the options for organising children and staff on two sites. These discussions will be facilitated by Dudley Council but decisions regarding the deployment of staff will be with the Governing Body of Greenfield Primary School in much the same way as now. There is no reason why the arrangements should be detrimental as there are many opportunities to be more flexible because there will be more staff and a broader range of expertise. Both schools will be seeking to ensure that these strengths are fully utilised in the arrangements that emerge over the next few weeks and months.

- 8 The LEA have mentioned the building of a new larger school in the area for pupils of Beauty Bank and Greenfield. If there are already excess places in Stourbridge why would we need this? Assuming that it is actually possible (permission, budgets etc), how can the Council justify the cost when Greenfield is a modern, well-located school? How will it affect staff and pupils? By this time won't Beauty Bank pupils already have been absorbed into other schools?**

Dudley Council has a responsibility to ensure that its resources including the government grant for education is used as effectively as possible. This means that the excess surplus places across the whole of Dudley have to be removed and the resources freed from the process reinvested in education. The proposals

reduce capacity in two schools in Stourbridge, close Beauty Bank and increase capacity at Greenfield Primary. In the short term this will be of significant financial benefit to all of the schools in Stourbridge and across Dudley.

The Council also has to plan for the future and the current proposals take full account of the known housing developments in the area. There is sufficient capacity in the proposed changes to absorb any growth from the relatively small number of housing developments. In the long term there are three major sites to the north and north east of Beauty Bank that may become housing developments (or other developments) in the next 5 - 15 years. There are no proposals for these sites and they may not be developed but there is sufficient time to make sure that school place planning is flexible enough to respond to any significant increase in the demand for places that might affect schools such as Greenfields and Amblecote. Beauty Bank is not viable now and the possibility of housing developments in the long term does not change the position.

The new school will incorporate all of the facilities required for 21st century learning.

No discussions have taken place regarding the future of the existing Greenfield Primary School, as the Beauty Bank proposal has not been considered by School Organisation Committee. If the proposals are supported the existing building will be required for several years and there will be appropriate time to consider any future use in due course. Whilst the building has some shortcomings for a primary school of the size of Greenfield it could be suitable for other purposes.

9 It seems the LEA are fixed on the proposal that Beauty Bank will become an annex to Greenfield and have not given any thought to alternative options. It looks like the Council using their position to influence the outcome they want which is unfair to pupils, staff, parents and leaders of both Beauty Bank and Greenfield Primaries.

The consultation on the original proposals ran from 12 September to 21 October. The concerns raised during this consultation included concerns about

- increasing capacity on the Greenfields site when it is already under pressure in its current buildings
- the difficulties of managing and using a remote playing field
- the impact on children, parents, staff and community of closing Beauty Bank

The Council has considered these views carefully and brought forward a proposal that addresses both sets of concerns as well as creating a new fit for purpose school on a single site.

10 If numbers are dropping and budgets are cut we are concerned that a new school may not materialise. Can we have any reassurance that this will happen and that it will be in place within 3 to 5 years? If it doesn't happen and Beauty Bank has been annexed to Greenfield in anticipation of it, both of these schools could fail.

The Greenfield Primary School playing field, a few minutes walk from the main school site, is large enough to build the new school and is already in Council ownership. Dudley is receiving increasing levels of capital funding each year and as the number of schools decrease and schools' devolved capital increase there is less demand on the total capital programme. The different funding streams can be used to finance the building of a new school and there are other possibilities. There are additional sources including the recently announced DfES primary capital programme intended to rebuild or refurbish half of the primary school in England over the next 10 – 15 years. Dudley has committed to the Primary Schools Review which is about removing surplus places to release resources for reinvestment. The main aim however is the creation of a new pattern of schools that are all suitable and all with high quality 21st century learning facilities. The new Greenfield Primary School is part of that commitment.

11 There are plenty of surplus places at Gigmill, St James CE and Amblecote primaries. Why can't Beauty Bank pupils be absorbed by these schools? Surely this would cause less disruption to all schools involved and be more financially viable?

The original proposal was based on closing Beauty Bank and providing alternative places at nearby schools including Greenfields Primary. There are very few places available at Greenfields Primary and additional capacity would be needed. In discussions with Headteachers over the previous year there has been an emerging need to address the variety of planned admission numbers and to try and secure a better match of admission numbers with class size legislation. This means that planned admission numbers wherever possible should be based on 30 or multiples of 30 such as 60 or 90. This has not been possible in every situation and Headteachers argued that if it was not possible then mid points such as 45 would make organisation much easier especially in Key Stage 2. The original proposal would have created some extra capacity at Greenfields as well as supporting the school with the organisation of classes.

Greenfields Primary is the nearest school to Beauty Bank and in line with the principles and statements of intent set out in the Primary Review Refresh 2004 Consultation regarding local schools for local children this would best be achieved by increasing capacity on the Greenfields site. The proposal to build a new school avoids the need for this increase on the Greenfields site and will channel the resources into a much better fit for purpose new school for all of the children in the local area.

12 If numbers continue to fall in the Stourbridge area does this mean that staff in all schools, especially Beauty Bank if it does close, will be under threat of redundancy?

If the proposals to reduce the number of schools and reduce capacity in others are implemented now there is every reason to believe that there will be no compulsory redundancies. The schools budget for 2006/7 will be based on around 400 fewer pupils than 2005/6, which means that there will be about £1.4 million less to distribute through the formula. Every school will be affected regardless of how many pupils there are on roll because there is less to share

around. For smaller schools the impact is much more significant and without action reductions in staffing and other areas are inevitable. The Primary School Review proposals include a number of schools that will increase in capacity and will require additional staff which, combined with the normal annual turnover of staff and the opportunities provided through workforce remodelling there should be no compulsory redundancies.

- 13 **At the meeting for parents of Greenfield Primary an LEA representative accused some parents of being cynical. It is this sort of action by the LEA that engenders this cynicism and leads to distrust.**

The Council is responsible for ensuring that the resources available are used effectively to meet the needs of children and young people. As the numbers of pupils fall and the level of resource falls the need to improve the provision of primary places becomes increasingly important. To achieve this requires a balance between a range of statutory processes, local political processes and the need to engage stakeholders as much as possible. Every possible effort has been made during the Primary Schools Review to be open, transparent and responsive whilst recognising that speculation about particular schools could lead to increased instability if children and staff leave prematurely. Achieving the right balance between communication and protection of individuals is not always easy and it is understandable in the context of large organisations such as Councils and governments that motives are questioned.

- 14 **We feel that the proposal to annex Beauty Bank to Greenfield has appeared with limited supporting evidence and we fail to follow the basis on which it was formed. There would appear to be many different options proposed so why pick this one? As a matter of public record some evidence to back up this proposal should be made available. We would also like to know of the legal position on which DMBC has based this proposal.**

The primary Schools Review section on the Dudley website www.Dudley.gov.uk contains a wide range of data and other information to support the proposals. The proposal to continue using the Beauty Bank buildings as additional accommodation for Greenfields arose from the consultation responses. All of the responses to the consultation process are available as part of the public record. A summary of the responses were reported to Cabinet on 17 November and the reports are included in full in the annex to this response. Many options were considered in the context of the criteria agreed following the Primary Review Refresh 2004 Consultation before developing specific proposals for consultation from 12 September to 21 October. After detailed consideration by Senior Officer these proposals were considered to be the best for each local area and for Dudley overall.

School Organisation changes are proposed under the relevant legislation and guidance which is referred to in earlier sections of this response.

- 15 **The basis of the LEA proposals is to save money. How can maintaining two under capacity schools for 3 to 4 years whilst building another one possibly save any money?**

The basis of the proposals is to remove surplus places and create a new pattern of schools that are all sustainable educationally and financially. The proposal will close Beauty Bank and increase capacity at Greenfields. This will enable economies of scale to be achieved in a range of areas and provide more flexibility in the use of staffing and other resources. Using the Beauty Bank buildings for a period will also avoid the need to build additional accommodation at Greenfields and enable more resources to be invested in the new school. The proposal will not maintain two under capacity schools.

- 16 There is a lack of clarity in how the annex will operate in relation to the main school. Will there be combined events / assemblies / lessons / facilities? If so what are the timescales for this? How will the budget be split between the modern larger school and the 'condemned' smaller school? Beauty Bank may need even more funding to bring it up to Greenfield's standards.**

The proposal to close Beauty Bank is based simply on the fact that there are not enough children to keep the school open. The proposal is not related to standards of education currently offered. The lack of children and the impact on budgets means that Beauty Bank cannot sustain the quality of education currently offered. Please see the OFSTED inspection reports on Beauty Bank and surrounding schools and other data on www.dudley.gov.uk.

The details of how the arrangements will work will be developed in collaboration with Greenfields and Beauty Bank over the next few weeks and months. There will be regular communications with parents, staff, governors and others as the detail develops.

- 17 How will the legal responsibilities be managed? How regularly will either the annex or the main site be without a member of senior management? What procedures will be put in place to manage the increased risk of incidents, which warrant their attention having to be managed by others without seniority? In a climate of increased legislation, can the Council be sure that they will meet their obligations over the 3 – 4 year period of split site management?**

Please see response to points 5 and 16.

Both sites will require the presence of a senior manager. Over the next few weeks the Governing Body of Greenfields Primary in discussion with Beauty Bank, will determine the staffing structure required to manage two sites and provide for the total number of children. These discussions will be fully supported by the Director of Children's Services and other Council Directorates as appropriate. The Governing Body will be responsible for the same range of areas as now.

- 18 OFSTED reports for Beauty Bank and Greenfield show some very pronounced differences between the two schools. Beauty Bank has poor results compared to Greenfield and has above national average free meal places (30%) whereas Greenfield is low nationally (3%). Attendance at Beauty Bank is well below national average whilst Greenfield is**

consistently above. Such cultural and socio-economic differences should be considered and addressed. The next OFSTED report for Greenfield may be affected by these factors. What effect will this have on staff and the school as a whole? Where will management have to spend their time to bring the standards up?

Beauty Bank and Greenfields have significant strengths. This proposal will provide a powerful vehicle for building on those strengths, learning from each other and building a stronger community. The increase in pupil numbers will require an increase in staffing which will provide more opportunities for professional dialogue. Larger schools have more opportunities for professional development, career progression and more staff with a broader range of expertise and interests. This will create an enriched resource that will benefit more children, parents, staff and the community.

- 19 **Instead of wasting money on a new school or overcrowding Greenfield as it stands, why can't Greenfield be extended upwards to accommodate Beauty Bank pupils?**

Please see responses to points 8, 11 and 14.

- 20 **Annexing Beauty Bank will only provide short-term stability for children. It is just postponing the inevitable – children will still have to move to a different school with different children at some time.**

Please see response to point 9.

- 21 **The financial saving as a result of a lost Headteacher will not be a significant value. The ISR of the larger school will increase and the pay scale of the Greenfield Head will increase together with the deputies. The deputy of both schools will need additional increase salary due to extra responsibilities. Additionally, other leadership posts will need to be implemented.**

Schools with more pupils receive larger budgets and have more flexibility in how the additional finances are used. Over the next few weeks, the Greenfields Governing Body will determine the staffing structure required to manage the increased number of pupils on two sites. This will include changes to the ISR, additional posts and levels of pay. In the short term Greenfield and Beauty Bank will each receive a one off grant of £40k to support the additional demands arising from this proposal.

The proposals across Dudley will see a reduction in the number of posts which will be in line with the fall in the number of children. It is not anticipated that there will be any compulsory redundancies. This reduction is expected to occur through staff displaced from schools proposed for closure filling vacancies in other Dudley schools and a gradual reduction in posts as other staff leave as part of the normal turnover.

- 22 **If annexation is successful, Greenfield school could be more attractive with its additional building and early years centre. Governors could see**

possibility of increase in numbers at Beauty Bank site. This could cause problems in other local schools. Setting admission numbers at 20 at the Beauty Bank site could put Governors under pressure to increase as new pupils are attracted to Greenfield. Please remember that Greenfield currently turn new children away due to space problems. The annexe at Beauty Bank could allow for this.

The Governing Body of Greenfield Primary will determine how the children are organised and staff deployed between the two sites. The Directorate of Children's Services will provide any support required for this process.

- 23 If annexation is unsuccessful, pupils might leave and put the annexe under worse pressures than at present. Smaller classes, some year's merged, low budgets and unfair equality of resources between the two schools. This will see the option of a new build school taken out of the equation with parents and carers selecting other local schools which was the first proposal now achieved by default but prolonging the agony of inevitable closure with decline in standards at the annexe.**

The Directorate of Children's Services is confident that working together with Greenfields and Beauty Bank all of these issues will be addressed and the proposal will be implemented successfully. On the basis that Beauty Bank parents expressed strong views regarding the Beauty Bank site it is unlikely that there would be any premature departure to other schools. It is very important that strategies are put in place as soon as possible to begin building relationships between the schools for children, their families and the wider community. The chances of leaving for other schools are likely to recede when children and their parents become more familiar with Greenfields and supported during the integration process. They need to feel welcome.

- 24 If numbers reduce across the two sites the increased staffing will be subject to reduction. Possible redundancies may occur across more staff than at present causing greater problems to staffing and LEA.**

Over the next few weeks, the Greenfields Governing Body will determine the staffing structure required to manage the increased number of pupils on two sites. It is expected that the additional vacancies in this new structure will be ring fenced initially for Beauty Bank staff and that appointments will be made where there is a good match. There is a possibility that some of these posts may be on a fixed term basis which may be particularly appropriate for some staff. These proposals should have no adverse impact on staff currently at Greenfields. However if the proposals across Dudley are not implemented the financial impact will be severe in each of the next few years and all schools will have to balance their budgets appropriately including any required reductions in staffing or cuts in other areas.

- 25 Beauty Bank has facilities that are not available at Greenfield at present such as field, maintained early years facilities and catering facilities. Opportunity for the use of these facilities will have to be made available to all pupils and their families. Movement of families and children between**

schools may have to take place, is this efficient?

Beauty Bank and Greenfields have significant strengths in similar and different areas. The proposal provides a powerful opportunity to build on these strengths for more children, their families and the wider community. Over the next few weeks, Greenfield in discussion with Beauty Bank will determine how the arrangements will work including whether there should be any movement between the two sites or not and if so by whom, when and how it might work.

- 26 **If the new build is a high possibility why should the Beauty Bank site be available only to those parents who wish for their children to attend Greenfield school? All current families should have the opportunity to attend the new school without having to make choices through admissions. Parents and carers have chosen Beauty Bank for their own personal reasons and the forced re-direction goes against democratic principles. Through this process even less pupils will be left at Beauty Bank Primary School.**

All pupils have to be enrolled on the register of a school. The register of Beauty Bank will close when the school closes on 31 August. From 1 September those parents wishing their children to attend Greenfield Primary School would need to enrol on their register. It is not practical for children that might be in the Beauty Bank buildings to be on the register of other local schools. It has to be one school and in this case the proposal is for it to be Greenfields Primary School.

- 27 **Do you realise the amount of stress your proposals have put on the on the entire community of Beauty Bank especially pupils and parents? Beauty Bank is the highest achieving school in the area – beating the other local schools with education levels and achievement standards. Our children are happy and content at Beauty Bank and YOU are going to destroy all of this. Do you realise the impact it is already having and what is to come if the school does close? Why close us when we have so many good things at our school?**

The proposals have been brought forward because there are not enough children for Beauty Bank Primary School to be viable. It is the smallest school in the Borough and will not have enough money to pay for the staffing, supplies and services and accommodation required. The government grant for education budget for 2006/7 will be based on around 400 pupils fewer than 2005/6 which means about £1.4 million less to distribute to schools. Every school will be affected and the loss of pupils will affect Beauty Bank even more.

It is very important that Greenfields and Beauty Bank put in place a range of strategies to ensure that children, their families, staff and others begin working on integration as quickly as possible.

Please see responses to earlier points.

- 28 **Beauty Bank is capacitated with all the Special Needs Facilities that is required. We have a disabled toilet, flat access to ALL areas of our school, ramps and children who are well mannered and offer help, when needed,**

with our disabled children. Are children at other schools respectful enough to do this? Would they be able to deal with it? Have all the other schools got flat access? Have they all got disabled toilets at their schools? Do you have Special Needs teachers at all the other optional schools? Greenfield School has an IT room that is upstairs and also a library. Does this mean that children with mobility difficulties, will have to have these lessons on their own as they will not be able to access these facilities?

Beauty Bank and Greenfields Primary Schools have significant strengths. The proposal provides a powerful opportunity to build on these strengths. All schools work towards the development of values such as respect for each other. All schools have staff trained in meeting children's special educational needs. It is anticipated that the additional staff required to meet the needs of the increased number of children at Greenfields will be appointed from Beauty Bank. The buildings at Beauty Bank will continue to be used as additional accommodation for Greenfield which means that the disabled facilities will still be used. There are additional IT facilities on the ground floor at Greenfields. The new building will be fully compliant with all disability legislation including 100% access.

- 29 **Do you guarantee that the change to another school WILL NOT affect the children, Special Needs children in particular, with regards to bullying and alike? Do the other schools have teachers trained to cope with children with ABN or MLD? Basically, I feel the cost that will be involved, as regards to installing all these facilities, within all of these schools, could keep Beauty Bank open for, possibly, the next five years!!**

Over the next few weeks, the Greenfields Governing Body will determine the staffing structure required to manage the increased number of pupils on two sites. It is expected that the additional vacancies in this new structure will be ring fenced initially for Beauty Bank staff and that appointments will be made where there is a good match. The larger staff will provide a broader range of expertise and staff from both schools will be able to share their expertise more widely.

All schools take bullying very seriously. Greenfields and Beauty will work together to ensure that children and staff become more familiar with each other and work towards a smooth transition. The process of planning for a new school can be a powerful way of building a stronger community.

The fall in pupil numbers is affecting the annual budgets that schools receive to pay for staffing and other areas. Beauty Bank will not have the money it needs to pay for the quality of education that it currently offers. The cost of installing facilities comes from capital sources and this is not affected in the same way. However, the reduction in the total number of schools and the gradual investment in schools will release capital resources and ensure that more schools have better facilities for meeting special education needs.

- 30 **Beauty Bank offers several courses, FREE, for Adult Learning. It has utilised its facilities that are available, on-site, to cater for this. It has worked tremendously, bringing in parents and friends together from Beauty Bank and other schools around and out of the area. It's a beautiful, peaceful and friendly community room. We have all our own facilities that**

are required, toilet, kitchen etc. Also again it has flat access to cater for disabled adults. The courses run on days of the week and also are available at nights for people who have daytime commitments. The tutors are friendly and pleasant and put you at ease and have time for one to one teaching if needed. Many of the parents from Beauty Bank who attended these courses now work within the school as Classroom Assistants! If it weren't for these courses this would not have been possible. It has given us more confidence and enthusiasm to go back to full time employment. If the school were to close, all this would be lost and would take away the learning facilities available for adults too therefore taking away another facility for a deprived area.

The closure of Beauty Bank as a school does not mean that the adult education provision will cease. The buildings will continue to be used as additional accommodation for Greenfields Primary School. Discussions will take place over the next few weeks and months about how this type of provision might continue after 1 September. All schools will be required to offer extended provision from 2010 and Dudley is committed to building on the current provision wherever possible.

- 31 Greenfield School has no sports field on-site. Children need recreation areas at playtimes, just a concrete playground is not good enough, and with the extra children possibly attending the school it would make it more open to accidents. Have you thought about this? What about the fire regulations? Are the other schools going to be within the regulations regarding numbers of children in the school and are there adequate fire escapes to deal with extra children?

Both sites have access to a range of external play areas. There is no overall increase in children although Greenfield will see an increase in the total number of children registered. This increase will require an increase in the number of staff required for safe and effective supervision. When the new school is completed on a single site all of the children will have access to superb facilities both inside and out on the same site.

All schools are inspected with regard to fire safety and all requirements will continue to be met on both sites.

- 32 What is proposed to happen to The Robins Wood Centre? Couldn't that be re-opened and Greenfield move to that site? Beauty Bank as it stands could take in Greenfield pupils from Nursery, Reception, Class 1, Class 2, Class 3 merged with ours. The Robin Wood Centre would accommodate for Class 4, Class 5 and Class 6 merging our pupils into theirs – basically having an infant and junior school on the same site. Greenfield pupils would then have an on site playing field and all accessible areas for disabled etc. All children from both schools would obviously be kept within the same vicinity; hence no child would lose their friends and experience any trauma of any kind.

Greenfields Primary School capacity for 280 places. It has been slightly above or slightly below capacity every year since 1997. This is not the case with Beauty

Bank where numbers have fallen from 197 to around 130. Beauty Bank cannot afford to pay for staffing and other aspects of education. Proposals to reduce the capacity in other schools would cause disruption for a greater number of families and there is no guarantee that they would attend Beauty Bank as there will be places in other schools.

Also the Beauty bank and Robin Wood buildings cannot offer the quality of education that will be available in new fit for purpose accommodation on a single site.

The concern about children is taken very seriously. Most children take a lead in these situations from adults. If adults are confident and provide enough reassurance most children will adapt to change relatively easily. It is important that schools and parents work together on a range of strategies that help children become familiar with new faces and new environments. The Headteachers of Greenfields and Beauty Bank are already working closely together to ensure that ways are found of bringing children, staff and parents together. This is a very good start to building relationships whatever the outcome of School Organisation Committee although there is still much to be done. The proposal will allow existing relationships to continue and provide opportunity to form new friendships. This can be a powerful opportunity for building a stronger community across the whole area.

33 You have predicted that birth rates are falling and are to continue for the next five years – what if they don't? Birth rates have a cyclical nature. We had a baby boom in the 60's – 70's who's to say that won't happen again? What if it does? Will you have the funding to build yet another school?

Dudley has responded to changes in the demand for school places on previous occasions both in the total numbers of children and in local areas. The Office for National Statistics (ONS) was established as the primary source for a wide range of data on many different areas. Data on birth rates is collected from health authorities and undergoes a series of quality checks before they are posted as official statistics. The birth rates for Dudley show a marked decline from a peak of 4,116 live births in 1990/01 to 3,344 in 2003 a drop of around 18%. The birth rate showed a slight increase to 3,514 in 2004 but the average taken across any period of three or more years shows a downward trend. The ONS projections to 2030 show stabilisation at around 3,300. Similar trends are evident for neighbouring authorities.

The Primary School Proposals are not driven by predicted birth rates. The numbers of children that will attend Dudley primary schools in 2009/10 have already been born and the fall in total numbers has been evident in January pupil counts since 1997. These figures are robust as they are required for statutory returns to the DfES and based on identifiable children.

The ONS data records actual birth data recorded in previous years and shows long-term predictions. These figures show that Dudley's annual birth rates are predicted to settle at around 3,300 per year for the foreseeable future. If the birth rate were to rise it would take at least five years for there to be any impact on schools and there are sufficient surplus places built in to the proposals to cater for any growth. Any such growth would be too late to change the severe financial implications facing schools now and over the next few years.

The money for new schools has often come from the government capital sources by way of successful bids such as the £8.5 million to replace Wrens Nest Primary and Old Park Special Schools. These bids have to meet strict criteria and it is important that Dudley is able to demonstrate that it is making good use of its resources by removing surplus places whilst simultaneously supporting schools in raising standards.

- 34 **At Greenfield School there is already no space for any special needs teaching, music lessons or 1-to-1 reading (corridors, the staff room and the head and deputy head teachers' rooms are frequently used for these purposes). The library is often used as a teaching area, quiet areas are now used as cloakrooms and there is hardly any storage space. Playground / PE space is already overused and restricted as the school playing fields are not adjacent to the school.**

Please see responses to points 3, 7 and 9 and comments about Greenfields accommodation in the earlier sections. The proposal to continue using the Beauty Bank buildings as additional accommodation for Greenfields Primary will ease the pressure in the short term whilst the new accommodation is being planned. The new building will meet all of the needs and will provide a range of facilities that neither of the existing buildings can offer.

- 35 **Whatever happened to freedom of choice? By annexing the schools you are taking away parental choice in the area.**

Parents have a right to express a preference for places in any school in Dudley or anywhere else. The criteria used for allocation of places and parents' rights to appeals are set out in the Parents Guide to Primary School Admissions published by Dudley Council. Legislation also provides for changes to the organisation of schools which includes closures, changes of size, location or status and the opening of new schools. The proposals take full account of this legislation. Parents of children at Beauty Bank will still be able to express preferences for the Greenfields or the other four nearby schools or any of the other schools in Dudley. Whilst it is acknowledged that Beauty Bank will no longer be available some pupils in the area already attend schools in other parts of Dudley.

- 36 **The inevitable redevelopment of the Enville St / Beauty Bank / Gas Works**

areas will most likely increase residential capacity in the catchment area of both Beauty Bank and Greenfield. New developments attract families and pupil numbers will rise. Immigration and the Black Country Study may also attract people to the area. Have you taken this into account? There may be a need for both schools to continue as they are now.

Please see response to point 8. Whilst there is clearly some potential for growth in population from these sites there are no proposals in place and it is unlikely that there would be any significant change in the current demand for primary places within the next 10 years. Even if there was an increase in demand it would be too late for Beauty Bank. The proposal will also create a new fit for purpose school with 21st century facilities that neither Greenfields or Beauty Bank can offer.

All relevant factors have been taken into account. Please see Appendix 1 of the Cabinet Reports which are included as Appendix H in this response. The Black Country Study is a starting point for a longer-term strategy for the region. The outcomes of any changes such as initiatives to increase the birth rates would not affect Dudley schools for at least 5 years. By 2010 there will be 2,358 fewer pupils in Dudley schools than now based on children that have already been born. This means that school budgets will have £7.8million less than this year. This will happen irrespective of any school review proposals.

Failure to acknowledge the significance of this crucial factor or take action by implementing the primary school review proposals will result in very serious difficulties for children, parents, staff, governors, communities and all other parties.

37 No adequate response was received from Dudley Council to questions, points and proposals sent in during the initial consultation period. In addition, minutes of meetings were not made available as promised.

The total number of enquiries by letter, email, telephone and website has not yet been calculated but will be in the region of 10,000. From September to December there were 6059 enquiries to the Primary Review Web Pages on www.dudley.gov.uk. This included 4,269 enquiries to the primary review site and 594 specific enquiries to Presentations and notes, 293 to Freedom of Information Responses and 903 to Frequently Asked Questions.

In addition to the provision of this information Dudley has also responded to hundreds of letters, emails, telephone calls and questions posed at meetings. There have been 21 consultation meetings organised for staff, governors and parents at schools with additional meetings convened by request. There has been a range of additional meetings including Area Committees, parents groups,

campaign groups, community groups, individual parents and a wide range of meetings with other Council directorates and external agencies.

Invitations have been extended to individuals or groups to discuss Primary Review issues on several occasions.

38 Almost three quarters of respondents rejected the Authority's plans in the initial consultation.

Around 11,000 questionnaires were distributed and the documentation was also available for printing directly from the website at www.dudley.gov.uk. The total number of 778 questionnaire responses received was disappointing. A return rate of only 7.07% on an issue of such importance is difficult to explain.

Comments offered in explanation have suggested that other schools may have been reluctant to respond due to a sense of loyalty to colleagues in schools proposed for closure. Others suggest that the current workload in schools is so demanding that schools may have had different priorities particularly if they felt that they were not directly involved. It has also suggested that schools are being consulted on so many issues that the notion of consultation overload may have reduced participation.

Whatever the reasons for such a low response may be, the responses received should be considered with a degree of care. For example, Question 1 asked Do you agree with the case for changing the current pattern of primary schools as described in paragraphs 5 – 10? There were 476 respondents that said no to this question of which 367 were parents with the vast majority (348) from nine schools - Beauty Bank (23), Brook (13) Maidensbridge (68), Mount Pleasant (41), Ham Dingle (72), Holt Farm (40), Highfields (36), St Mary's CE (31) and Sycamore Green (24). Some of these respondents stated they could not say yes to this question, as it would have influenced any future decision on their school. In some instances the concerns were based on proposals to reduce capacity or increase capacity. The remaining "no's" came from parents from 13 schools (22 schools represented and no response from the parents of 60 primary, 6 special or 22 secondary schools).

This compares with 158 parents that said yes from 23 schools including eight of the nine schools above.

The response from parents is also very different to that from Headteachers. 21 Headteachers (75% of 28 respondees) said yes to question 1. Only six Headteachers (21.4%) said no. Similar differences appear with other categories of responses.

It is unwise to draw any conclusions on these returns other than

- The return rate was very low
- The percentage of no responses to questions is higher from those schools directly affected than from other areas
- The views of children, parents, staff, governors and others across all Dudley schools are not reflected 778 responses

It is true that of a very small return of 778 there was a high proportion of negative responses from a small number of schools directly affected. It is also true that there was a high percentage of positive responses from a greater number of schools.

39 Dudley Council failed to inform all four Borough MPs of their plans until after informing the local press. This shows total disdain for the office of Member of Parliament and for the constituents it represents.

An outline project plan was developed during the early part of 2005 and confirmed during the summer with senior officers and the cabinet Member for Education and Lifelong Learning. Emphasis was placed on ensuring that the release of information took account of the need to manage and respond to the high emotions and likely interest from parents, media and others. A detailed process was planned for 8 September to inform

- Unions in preparation to respond to any staff welfare of other concerns
- Headteachers of schools proposed for closure or amalgamation, provide personal and professional support and agree arrangements for school consultation meetings
- Parents through a letter from the Director of Children's Services with details of consultation meetings agreed with Headteachers
- Media contacted to attend a briefing on 9 September on the consultation and proposals.

Although the sequence of events was planned well in advance the dates could not be confirmed until the cabinet Member approved the start of the consultation period. The involvement of Members of Parliament should have been sought at an earlier stage and this was a regrettable oversight. Members of Parliament were invited to a briefing on 9 September. Three of the four MPs were able to attend.

Comments from Headteachers involved were appreciative of the way this very difficult period was approached.

40 Is there a guarantee that students will be able to attend the closest schools if Beauty Bank closes? A guarantee will help provide a smooth transition and the least drastic amount of change which will cause less disruption.

The nearest school to Beauty Bank is Greenfields Primary. All parents who express a preference for this option will be guaranteed a place. There are also places at Amblecote, Gig Mill, The Ridge and St James CE Primary Schools. It is anticipated that most parents if not all will opt for Greenfields.

41 Local citizens will be affected by the change in traffic flow and business owners will be affected by the reduction in customers.

Analysis of the distance travelled by pupils attending Beauty Bank Primary indicates that on the whole there is little negative impact on these pupils travelling to the alternative schools proposed, with 83% of pupils within 1 mile of Greenfield compared to 88% within 1 mile of Beauty Bank. Further analysis shows that 16 pupils live greater than 1 mile from one of the 4 alternative schools, which is exactly the same number of pupils who live greater than 1 mile from Beauty Bank. These proposals are consistent with the principles and statements of intent set out in the Primary Review Refresh 2004 Consultation.

As the distances are very similar it is extremely unlikely that there will be any impact on traffic flow. Equally, it is extremely unlikely that there would be any impact on business owners. It could be argued that the impact of better access to a broader range of educational opportunities provided by larger schools will in time, improve training and employment opportunities and lead to higher income per capita with clear benefits for the local economy.

42 How were the schools to be closed chosen? It is hard to understand the rationale of choice as not all of the schools are losing pupils at a fast rate and there are other schools in the borough whose rolls are falling faster.

The criteria are fully described in the reports to Cabinet (Appendix 1) included in Annex H to this response and in the Primary Review Refresh 2004 documentation available on the Primary Review Pages of www.dudley.go.uk.

43 For all citizens affected by the school closures, their political representation at council level is with an opposition party or in an area of high deprivation, minority ethnic concentration or on land which would release a high resale value. This is an unusual statistical anomaly which merits further investigation.

The schools proposed for closure are the smallest schools in the Borough. Beauty bank is the smallest (130). Halesowen CE 2nd smallest (131), Sycamore Green 3rd (147), Highfields 4th (147), Holt Farm 6th (164) and Maidensbridge 7th (174). All five townships have significant levels of surplus places and each township has schools proposed for closure, reductions in capacity and increases in capacity. There is no connection with political affiliations and there have been

no discussions regarding the future use any of these sites. It would not be appropriate to enter into such discussions before final decisions have been taken regarding their use as schools.

The published criteria referred to in point 42 have been applied consistently.

- 44 **While Beauty Bank is an integral part of the community, its role will be inherently different if the building is no longer a school. Any converted buildings have different community roles. The needs of the community must be taken into account if the building is converted. If Beauty Bank Primary School must be converted it must remain as a community centre and is not used for any other purpose or bulldozed in order to have the land sold.**

No discussions have taken place regarding the potential uses of the site and buildings if the proposal to close the school is approved. There is a list of schools that have closed in previous years attached as an annex to this response. Although the list is work in progress many of the former schools are still in use for a variety of different purposes. Closure of schools therefore does not automatically mean disposal and development.

- 45 **Reassurance is needed that any monies saved through combining the schools will be reinvested into education and not be used in other pursuits.**

In June 2005 the Cabinet approved a recommendation to reinvest any resources released from the Primary schools Review into education.

- 46 **Ideally Beauty Bank Primary School should remain as a primary school in order to have it remain in its same and present community role. Has the Council explored the option to use the available space in the schools for alternative purposes? If available space is used in more creative ways, education money can be saved and the changes in the community will be the least drastic. Many other authorities have faced falling rolls and employed creative ways of using premises such as children's centres, Sure Starts and so on. I would like the Authority to confirm and show evidence that they have investigated this and other options such as federation as suggested by local parents. I believe demonstration of such studies is a requirement of the Ministry's guidelines also.**

Schools receive the major part of their funding based on pupil numbers. As pupil numbers fall, the budget also falls. The overall costs of providing staffing, supplies and services and accommodation continue to rise. The running costs of a school can be offset through using the accommodation to attract additional income through lettings or other purposes. This is a very difficult challenge however in areas of deprivation where the income per capita of the local population works against the school charging the true costs of the accommodation and services. For example, families with low incomes may have other priorities and cannot afford high charges to use facilities. In larger schools the additional income is helpful as it is likely that the accommodation will be open

for other purposes and the additional costs of lettings are less. For Beauty Bank such income would be essential and there is no evidence that there would be sufficient income to either cover the true costs of the lettings or subsidise the core activities that the school budget cannot provide for the children. If this was a viable option it is likely that Beauty Bank like other schools would have already been involved in these types of activities.

47 The Borough's track record is less than sparkling when considering that its plans to merge two Church of England schools in Halesowen, St John the Baptist and Hasbury have been rejected by the Education Minister twice already. Can the Authority guarantee this will not happen to their plans this time around?

Dudley has had previous success in bidding for capital funds for new developments. In the DfES Targeted Capital Fund Dudley has secured funding for secondary schools including Holly Hall and Ridgewood. In October the Secretary of State announced that Dudley was to receive £8.5 million to replace Wrens Nest Primary and Old Park Special School. This bid was scored in the top 10 of 500 bids from LEAs in England. The third element of this bid was turned down for the second time and other funding options are being considered.

The DfES have strict criteria for allocating funding and it is essential that Dudley can demonstrate that it is addressing the removal of surplus places whilst simultaneously investing in the creation of a new pattern of sustainable fit for purpose schools. These proposals are consistent with those aims.

48 Many new school buildings are desperately needed in Dudley. Old Park Special School for example, where severely disabled pupils are in dismal conditions and Bromley Hills school is, in parts, leaking and worn. Why consider building a new Beauty Bank / Greenfield School when the building and education within is superb and other schools are in greater need?

Please see response to point 47. Dudley has successfully bid for funding to replace Old Park Special School and a project team have already begun to work on the detail. The new school for Greenfield Primary School will provide fit for purpose 21st century learning facilities for children across the area and serve as a model of good practice as other schools due for replacement begin to shape their ideas. As the repairs and condition backlog is reduced through either the existing capital programme or by replacing schools there will be more funding available to meet the needs of fewer schools. The capital programme is currently considered by the Asset management Group with representation from headteachers and governors. Capital is allocated on the basis of need but some schools with relatively low priorities may fail to rise up the list as more urgent needs arise. This approach will improve every school's potential for receiving funds from this programme.

49 An annexe would be insulting to Beauty Bank pupils, they need to be split and welcomed into thriving vibrant school communities.

The word annexe has been widely misunderstood. The proposal is to close Beauty Bank Primary School. The buildings will continue to be used as additional accommodation for Greenfields Primary School until consolidation onto a single site. All children will be registered on the roll of Greenfields Primary. The staff will Greenfield Primary staff and work within its policy framework. There should be no difference for staff or children arising from whether they are working in the Beauty Bank or Greenfield buildings. Other schools in Dudley occupy more than one building such as Red Hall Primary and there is no detrimental affect. It is however better to be on a single site and this will be achieved with a new school on a single site.

- 50 **As parents we feel that a more workable solution would be to build a few new temporary classrooms at Greenfield School for the 35 children presently at Beauty Bank who would be designated to Greenfield if split between three schools. In the longer term a solution would be to change the catchment area slowly so a few children each year in the South Avenue/ Road area and beyond go to Gigmill School which has spare places to take them. This would therefore free up places for a percentage of the Beauty Bank area children to be admitted to Greenfield each year. Surely this would make a less stressful solution for all involved and would involve minimal cost and upheaval for everyone.**

The basis of the original proposal was to close Beauty Bank, increase capacity at Greenfields by providing additional accommodation and providing alternative places at St James CE, Gig Mill and Amblecote. The consultation responses raised concerns from both Greenfields and Beauty Bank which resulted in the current proposal to close Beauty Bank and use the buildings as additional accommodation until a new fit for purpose school can be built on a single site.

The Governing Body of Greenfields Primary asked parents to give their views on Proposal 1 – Increase admission number from 40 to 45 with extra classrooms to be built on the Greenfield site (original proposal)

Proposal 2 – Annex Beauty Bank with Greenfield Primary and consolidate on a new site in 3 – 5 years.

Proposal 3 – I am willing to support the Governing Body in its final decision.

Of the 92 returns received

- 59 opted for Proposal 2 – in support of the current Beauty Bank proposal
- 19 opted for Proposal 1 – in support of the original increase on the Greenfields site
- 8 supported the Governing Body in its final decision
- 6 gave either a mixed response or stated that they did not have enough information to respond.

There is a degree of support for the proposal amongst parents and it is important that Dudley Council work closely with all of the stakeholders to ensure that the proposal is implemented successfully and smoothly.

CONCLUSION

It is considered that a compelling case for the closure of Beauty Bank Primary School is in existence. The case for closure of the school is based on the substantial and incremental fall in the live birth rate over the last few years. The fall in pupil numbers has been known in Dudley for at least 8 years and a framework of principles and statement of intent for using in formulating specific school proposals was developed early in 2005.

Beauty Bank has seen a fall in the number of pupils attending from 197 in 1997 to 130 in January 2006. Nearby Greenfields Primary school will continue to use the beauty Bank buildings as additional accommodation until consolidation onto a single site with a new school and learning facilities for the 21st century. With these new facilities including access to early years provision children have better opportunities across the full scope set out in Every Child Matters. Dudley Council is implementing its School Organisation Plan Commitment to address surplus capacity and create a new pattern of schools that are financially and educationally sustainable.

Existing and intending pupils of Beauty Bank can be confidently expected to receive as good as or better overall provision at nearby primary schools. These schools are willing and capable of welcoming the displaced pupils from Beauty Bank without detriment to those schools or their existing pupils. The proposals to continue using the Beauty Bank buildings as additional accommodation for Greenfields Primary will ensure a high degree of stability and integration. This is consistent with Dudley Council's declared aims of putting children and young people first and improving educational standards and achievement for all. Although the Early Years Development and Childcare Partnership have not expressed a view on these proposals, there is strong support for the establishment of a Children's Centre nearby. It is anticipated that the EYDCP would support a proposal that improves access for all children and families in the local area including Beauty Bank to the range of excellent services that will be available.

The Secretary of State has established a position against the closure of small schools. The compelling nature of the case for closure of Beauty Bank speaks for itself in the specific local circumstances. Acknowledging that this presumption is in existence, Dudley Council contends that it can be and is clearly rebutted in respect of the closure proposals for Beauty Bank.