



DJS/NPJG/CAS

13th July 2018

Mrs J Russell
Clerk to the Governors
Dene Magna School
Abenhall Road
MITCHELDEAN
Gloucestershire GL17 0DU

Dear Mrs Russell

Proposal to increase the age range of students taught at Dene Magna School by adding a sixth form and teaching A-level students in the new campus building in the Northern Quarter

Response to consultation

John Kyrle High School ("JKHS") places on record its opposition to the proposal by Dene Magna School ("DMS") to open and operate a sixth form in the new Gloucestershire College ("GC") campus in Cinderford from September 2019.

Our objections are based on the impact on other provision locally, viability, need and practicality.

Impact on other good provision locally

You will be aware that JKHS has a large (c.300) sixth form (the "JKHS Sixth Form") which continues to be an outstanding A-level provider. The JKHS Sixth Form was judged outstanding by Ofsted in 2012 and this judgement was confirmed in our most recent inspection in March 2017. This report noted that:

"Parents and students particularly value the school's successful and high-performing sixth form."

One parent had told inspectors:

"My son joined in the sixth form but instantly felt at home there and had confidence in the teachers. Staff are very supportive and understanding. An excellent sixth form – thank you."

Our academic performance has been consistently strong.

- Our sixth form has achieved **60%+ A*-B** grades at A level for each of the past five years.
- Our 2017 A-level progress score was **+0.17**, above average. In 2016 this measure was **well above average**.
- The independent A-Level Performance Service ("ALPS") has placed JKHS in the top **10%** of A-level providers nationally for three consecutive years.



- We routinely have over 30% of our Year 13 cohort gaining places at Russell Group institutions, including Oxford and Cambridge.

A large part of the success of our sixth form is due to the subject breadth we can offer. This is evidenced in two ways.

- We offer 28 subjects at A-level. This encompasses all facilitating subjects, including English literature *and* language, maths *and* further maths plus three modern languages. We also offer more specialist, unusual courses, such as geology, textiles and music technology.
- We teach these 28 subjects in up to 39 classes per year. Students can, therefore, choose a combination of subjects at A level and we can usually find a way for them to study their choices, as there are multiple classes in many areas.

This breadth and success has been driven by the growth of the JKHS Sixth Form in recent years. As well as our own Year 11 students, we recruit many from nearby 11-16 schools. In our current sixth form we have:

- 170 students from JKHS;
- 116 students from other schools; and
- 286 total sixth formers.

Given that many of our external students come from the Forest of Dean area, it is clear that reducing these numbers would seriously impact provision at JKHS, to the detriment of all concerned.

With the JKHS reputation and proven track record at A level, it is likely that some students would continue to choose us for their post-16 education even if the new DMS sixth form opens. Yet our numbers would fall and this would reduce our capacity to offer our current breadth of provision. It would leave the new DMS sixth form with even more limited numbers and the consequent expense and narrow subject offer. We contend that this would be the worst of all worlds and we draw your attention to section 1 of the Department for Education ("DfE") Guidance "*Making significant changes to an open academy*" ("SCG"), March 2016. This makes it clear that it:

"...expects that academy trusts do not propose changes that will have a negative impact on basic need or other good provision in the area." (p3)

Provision at the JKHS Sixth Form is outstanding and would be impacted negatively if student numbers were to fall as a result of the DMS new sixth form opening in Cinderford.

To further illustrate this point, consider the composition of classes at the JKHS Sixth Form. A reduction in external applicants would mean a reduction either in the number of classes we can run (and the subsequent reduction in breadth of offer) or, in several cases, would mean that subjects would not run at all. For example:

JKHS Year 12 2017-18

Subject	JKHS students	DMS students	Other external students	Number of classes 2017-18	Number of classes if external applications fall
English lit	14	8	6	2	1
Biology	19	4	6	2	1
Further maths	4	4	1	1	0
Physics	9	9	6	1	1 or 0
Sociology	17	12	4	2	1
French	6	1	1	1	0

It is clear that JKHS recruits sufficient students to run its current sixth form provision. It is also clear that there are **insufficient students to make two sixth forms viable**. We can run French, for example, partly because we can subsidise the cost of the smaller numbers by taking it from the larger numbers elsewhere. If the two institutions compete for the same students, the outcome will be that **neither of us** will be able to offer French. Section 2 of the SCG makes it clear that:

“proposals likely to have a significant impact on other local provision must provide evidence that the education of children in the area, as a whole, will not be compromised”. (p9)

In addition guidance in the SCG states that:

“academy trusts will need to ensure that the change is aligned with local pupil place plans”. (p4)

This, therefore, shows the lack of viability of the proposal.

JKHS contends that there are too few students in the area to successfully operate two A-level provisions in such close proximity.

The DMS proposal says that, *“Local Authority forecasts of pupil numbers across the Central Forest Secondary Schools (not including Wyedean and Newent) and analyses of projected numbers of students who may achieve grades that enable them to study A levels show a healthy cohort who, we know are not all accessing the wider provision.” (DM proposal, FAQ, Q2)*

It goes on to say:

“Note: These projections are based upon 2017 GCSE outcomes across the four Central Forest Schools. These numbers will rise in line with continued improvements across the 4 schools.”

We would like to see the local authority forecasts, as we believe these statements are too vague to be of use when asking for a large sum of public money to fund a new sixth form. This case is not proven. Students **may** achieve the grades – but these are new GCSE exams and students **may not** achieve the grades. Indeed, across the four central Forest schools, the numbers attaining grade 5 in English and maths in 2017 were:

School	% attaining grade 5 in English & maths 2017	Number of students attaining grade 5 in English & maths 2017
Dene Magna School	40%	58
Forest High School	21%	10
5 Acres/Lakers	31%	35
The Dean Academy	28%	38
Total		141

(Source: <https://www.compare-school-performance.service.gov.uk>)

This is not an extensive pool of students reaching the minimum necessary standard to study the new, revised A levels. Nor does this demonstrate capacity within the central Forest schools to deliver sufficient students qualified to the necessary levels. To even come close to the proposed figures the new sixth form would have to attract *every single learner* in the area who reached the required standard. This is completely unrealistic. Students choose a variety of paths at 16, and rightly so. Some will choose JKHS because of our track-record of success at A-level. Some will choose college courses, in the Forest and beyond. Others will pursue employment and apprenticeship routes. There is a presumption in the proposal that is not borne out by the demographics and attainment in the central Forest area.

The DMS proposal says that entry requirements will mirror those of nearby A-level providers. At JKHS (the nearest) we ask for 5 grade 5s, including English and maths. Within any student population, there will be a

variety of destinations post-16 for a variety of reasons. Students in the central Forest area can access comprehensive school sixth forms, selective school sixth forms and a variety of colleges, as well as employment and training opportunities. There are simply not enough students to make a new provision viable and the contentions in the DMS proposal are just that – contentions. There is no evidence to back up the claims made and, when examined, we believe the information which is in the public domain shows that there are insufficient student numbers to support a further post-16 provision. To set a pupil admission number ("PAN") of 250 is unrealistic. To say that there will be 261 in 2019/20, when only Year 12 would be at the new provision is nonsensical, as are projections of 250+ for later years (see DMS FAQ, Q2). We request to see breakdowns of student destinations from DMS for the past three years. The latest publically-available destinations data for the central Forest schools, included below, do not support the arguments in the DMS proposal.

School	Pupils staying in education and employment (National average 94%)	FE college or other FE provider (National average 38%)
DMS	94%	57%
Dene Academy	86%	61%
Forest High	96%	79%
Five Acres/Lakers	94%	72%

(Source: <https://www.compare-school-performance.service.gov.uk>)

Even with outstanding sixth form providers nearby, it is clear that many students choose routes other than A levels. It also shows that students are *already finding* viable routes post-16, negating earlier contentions that there is a lack of engagement in the area. **Any new provision is going to negatively impact on the range of organisations who currently provide pathways for central Forest students.** Students will continue to choose different paths at post-16 and the DMS proposal guesses at the numbers of students who will stay if the new provision is opened. With limited public funds available for education, this proposal is a gamble.

This is further illustrated by the claim in the preamble to the DMS proposal that:

"In April 2017, Gloucestershire College reviewed its A-Level provision (across three campus sites). It cited competition in Cheltenham and Gloucester in particular, as well as the difficulties in recruiting staff across the campus sites on shorter contracts as a key factor in deciding to end its A-Level provision."

This was contradicted in a statement to the press on the decision to end A levels in May 2017 when Dr Karen Morris, assistant principal of Gloucestershire College, said:

"The College has taken this difficult decision due to declining student numbers applying for A-Level courses. This is primarily because there is a significant drop in the number of young people aged 16 to 18 in the county combined with an increase in the number of sixth form places available in the county's secondary schools." (The Forester, May 2017)

When one A-level provision has already failed in the area because of a lack of students (and this was a key reason behind the change at the then Whitecross High School in Lydney some years ago when its sixth form closed) and because of a recognised surplus of places, it is **not viable** to open a new sixth form as DMS proposes. Sixth forms need substantial numbers to be viable – the SCG makes it clear that 200 is a minimum number for a sixth form (SCG p9) and this not evidenced here. Indeed, were the new provision to open, the impact would be that **both** JKHS and DM would have sixth forms of less than 200 – two non-cost effective provisions instead of one healthy and successful one.

Need

The central Forest area is served by a plethora of post-16 institutions. These include:

- Comprehensive school sixth forms in Ross-on-Wye, Newent, Chepstow and Monmouth;
- selective school sixth forms in Gloucester city;
- Gloucestershire College in the Forest itself; and
- additional FE campuses at Hartpury (rated *Outstanding* by Ofsted in June 2018), Gloucester city and Cheltenham.

Students, therefore, already have access to a wide range of opportunities after Year 11. Whilst, in some instances, students have to travel to that provision, it is important to recognise that this is normal. Students from Ross-on-Wye have to travel to access FE courses in applied subjects, or equine studies, for example. This is not an argument for saying that an FE college should be built in Ross. There is no need to open a new sixth form in the Forest, especially at a time of financial stringency and, as recognised by Gloucestershire College in 2017, insufficient student numbers.

Practical issues

There are further unsubstantiated claims in the DMS proposal. The FAQ Q2 outlines the issue of transport and says that, "*some students face journey times of over two hours to access current A-level provision on public transport*". How many is *some*? Where are they going? What research was done to show this? No student spends two hours a day on a bus to access the JKHS Sixth Form.

This section of the DMS proposal also cites transport difficulties and cost as barriers for disadvantaged students and that an increase in students who are NEET (not in education, employment or training) results. Again, this is not evidenced.

Progress 8 for disadvantaged students at DMS has been -0.5 for the past two years. Low outcomes for disadvantaged students will be more important in preventing access to appropriate post-16 courses than transport issues.

There are further questions raised by the DMS proposal. Staff have been trained to deliver A levels, it says, but what work has been done to ensure that pre-16 education is not impacted adversely by this focus? How will staff travelling between sites be managed to ensure teacher workload is manageable? How will staff provide the necessary levels of close support of their A level students if they are moving between sites?

What arrangements have been made for the governance and financing of the new provision? The DMS proposal is clear that facilities *have already been built* in the new college for A level provision. How was this funded? How much did it add to the build cost?

Why are the arts under-represented in the list of subjects to be offered at the new sixth form?

Summary

JKHS believes that the DMS proposal to open a sixth form at the new Gloucestershire College site in Cinderford is flawed for the following reasons:

- student numbers are insufficient to make this a viable financial or educational provision;
- it would cause damage to the good provision by existing sixth form providers nearby, including JKHS, against the clear direction of the SCG;
- the DMS proposal is opposed by JKHS, Herefordshire LA, Herefordshire Secondary Heads Association, Hereford Sixth Form College and John Masefield High School. We understand that Gloucestershire institutions have also objected;

- the DMS proposal is assertive, lacks evidence and in many areas, especially on projected pupil numbers, is based on conjecture. This is no basis to spend public money on an untried, untested, limited sixth form for which there is no demonstrable need or the capacity locally to serve it.

We have enjoyed a positive relationship with DMS over the years. DMS students have been an asset to our school. We have seen them flourish in our sixth form, achieve well and move on to excellent universities, employment and high-level apprenticeships after they leave us. We believe that DMS students have been well served by JKHS and the other sixth form provision available locally. There are insufficient numbers of sixth form students and there is no demonstrable need for a new sixth form in the area. Our sixth form numbers, classes and, ultimately, our staff's jobs are at risk if the DMS proposal is approved. This is counter to the principles set out in the SCG and we trust that the decision will be not to proceed with the DMS proposal.

The SCG makes it clear that any new sixth form must:

- be large enough to be viable – over 200 students (this is not evidenced in the case of the DMS proposal because there simply are not enough students in the area who matriculate to A-level standard);
- offer a breadth of around 15 subjects (the lack of arts provision in the proposed DMS sixth form narrows the DMS offer and the proposal would reduce the subjects on offer in neighbouring institutions because of the limited pool of students);
- show demand, including any shortage of post-16 places and an assessment of the quality of level-3 provision in the area (there is no evidence of a shortage of places and the quality of level-3 provision nearby is *Outstanding* at JKHS and at Hartpury college);
- show the impact on other providers (we have shown here that JKHS would be seriously impacted by the new DMS sixth form, if it were to open); and
- financially viable (this huge element is not touched on in the DMS consultation document including in relation to; how DMS will manage if sixth form numbers do not reach those estimated, and the impact on 11-16 core provision should DMS cross-subsidise A-level teaching from other budgets?).

The DMS proposal is deeply flawed and should be rejected on the grounds that it cannot meet the conditions set out in the SCG. Our hope is that governors at Dene Magna will pause, reflect on the negative impact of learners in the area and decide not to submit a full business case to take this proposal forward.

Yours sincerely



Chair of Trustees



Headteacher