

Sir, before I begin I must declare my interests in this matter. As a SE Deputy I represent the communities of St Andrew and St Martin. My children attended St Martin's school, I was formerly Chair of the St Martin's School PTA and still have close ties with the school. My Mother was an award winning primary school teacher. I pledged to support St Andrew's School at the last election and I am fulfilling my promise today.

Fellow members, and for today, ladies and gentlemen of the jury, because that is what you are. You are being asked to sit in judgement on St Andrew's Primary School. A school that has existed for over 270 years and which is at the heart of the Parish. This school is being charged on multiple counts by the Education Department in connection with the allegation that it reduces educational outcomes of its pupils and costs too much money. I need not remind you that the penalty for being found guilty is death. Death, not just of the school but its community and just another bit of what makes Guernsey special.

As such, you must be convinced beyond reasonable doubt, that all evidence presented to you today justifies the closure of St Andrew's school.

And in the next few minutes I will demonstrate that not only is there sufficient doubt but that this sterile report is fundamentally flawed, and must not be used as the basis on which to close a school. That the theory behind it should be discredited, that the evidence, which amounts to no more than erroneous opinion, is circumstantial at best and that the reality actually points to the need to maintain and enhance what has been an integral part of our educational system for nearly 3 centuries. But rather than just condemn this report, in my summing up I will provide what I believe will be a truly workable alternative.

So, why are we debating this report today? Why are we faced with killing off another part of our heritage only 4 years after the States voted to keep St Andrew's open?

What's changed? What's really going on here? Why St Andrew's School?

The Ed Dept at the Grange know they need to make FTP savings. Time's running out. So what do they do? Get some UK consultants in of course. UK Consultants who will get paid only if a school closes. So, they dust off the plans from 4 years ago. Make out that there are lots of surplus spaces that cost us money, say that we're never going to have enough children to fill them. But they're then told St Andrew's doesn't have surplus spaces and is one of the cheapest schools to run. So, then these UK consultants come up with their little wheeze - multiple form entry is better than single form entry. Of course, by doing all that class sizes will increase, but hey its ok as the UK consultants now say that doesn't matter anymore. So, we get rid of some jobs, which aren't really jobs at all and bingo sorted!

Be aware, fellow members, that what is going on here, has been happening in the UK for many years now, with disastrous consequences and the excuses for closure have been on the same lines;

I will quote a former Chief Education Adviser for Gwynedd, Wales, who has criticised the report by Craig that is referenced by the Department. He states: A more sensitive and sophisticated series of arguments concentrating on the ‘best interests’ of pupils now seems to be underway – however, we should not forget that behind all these surface arguments, still lie the simple financial factors of reducing costs within a narrow interpretation of ‘value for money’ and making services more ‘cost effective’.

This report is doing just that.

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OK, so now let’s look at surplus capacity, or educational musical chairs as it should be called. Apparently we have more than 800 surpluses spaces around the Island. Oh no wait, we get another couple of spreadsheets, showing 500 or so, oh but then they includes classrooms that don’t exist and classrooms that don’t have any teachers. Non-catholics being expected to move to the catholic schools and schools that must have the powers of the tardis to look larger on the inside than they do on the outside to fit the children into their classrooms.

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Be in no doubt, this is THE fundamentally important point. This is why the St Andrew’s PTA sent their briefing note on Monday to reiterate the point they make in their rebuttal. The graphs shown in the report on pages 1810 are all wrong as they are based on the assumption that there is capacity for just over 4,500 pupils – their theoretical capacity, as calculated on page 1809, resulting in 800 theoretical spaces. There are not 800 spaces. The Department now admits there are not 800 spaces, just 500 spaces. Remember, this is not the St Andrew’s PTA telling you this, this is what the Department is now openly admitting.

Now, I think it is time for a little lesson. Although, even the education department would accept, it difficult teaching a class of 47. I expect you all to listen, even those at the back, as I will be testing you afterwards. Have your rulers or a straight piece of paper handy as I am going to demonstrate how a big surplus will turn into a serious deficit of places should St Andrew’s school close.

I would request all members to now turn to page 1810. There you see a graph of surplus capacity according to the Education Department, with a grey line showing the theoretical capacity of 4500.

Now take off the 300 spaces that the Department admit don't now exist – ie the 800-500 spaces, which takes you to 4200 and then take off the theoretical capacity of St Andrew's School of 240. That leaves you with a capacity, should St Andrew's school close of just under 4000 places.

Now take your rulers, or other straight line you may have and place it just on the 4,000 line. What do you see now? Yes the curve rises above the capacity line. And what does that mean? Yes, too few places for the number of pupils. And what do we call that? Yes, a right costly mess.

And that is even using the Policy and Research Unit's predictions of pupil numbers.

The Ed Dept quotes the UK Audit Commission as stating that spare places cost between £250 to £350 each and that they have worked out this costs £125-175k, resources, the Department say could be spent on improving and developing their primary provision. But, the difference here is that the Department has **no intention of passing on any savings to the receiving schools**.

But let's look further at surplus capacity as it actually exists in Guernsey today. Let us not get bogged down with the educational theory nor what things used to be like 20-30 years ago when schools had more pupils in them.

Schools have been remodelled since then. Teaching is different, even since Deputy Fallaize was at school. Structured one to one learning areas for Special Educational Needs are required. Health and safety requirements, as well as space needed for laptops and other infrastructure that didn't exist in the 80s now have to be included as part of the learning environment.

In St Martin's, every space is being used, there is no real spare capacity. In order to take the 40 or so children it looks like they are going to be allocated, a room with no windows will need to be converted into a classroom (conversion cost not budgeted), more toilets will be needed (costs not budgeted). Clearly, creating additional teaching space in some of the receiving schools will require compromises on quality, will require building works and will require teachers and assistants for these new teaching areas. Where in the schedule of savings do we see these costs?

Now let's turn to population predictions. The last time the Dept wanted to close schools they stated that the primary school population would decrease by 180 between 2009 and 2020, with an expected population of 3665. However, now they are telling us to expect 4,190 by 2019. An incredible variation of 525 more than their predictions in 2009!

The truth is, projecting future populations is fraught with difficulty. Indeed, as Professor Geoffrey Wood said only the other week, demographers are even worse forecasters than economists. And that's saying something.

I refer you to this month's SSD report P1916 para 464 where this very point is made; 'It should be understood that the model is a statistical model, not a budget. Therefore, the figures presented are subject to variation based on the accuracy of the assumptions made, which may, or may not, prove to be correct.'

Setting aside the fact that by closing St Andrew's, fitting children in the schools will be difficult, if not impossible without building new classrooms, as pupil numbers rise up to 2019 are we certain that pupil numbers will fall, thereafter? Are we even reasonably confident they will? Because if they don't, closing this school will prove to be a very expensive mistake. And I don't know how we can be. The model is already flawed by using a net migration figure of 200 when it has been nearer to 300 on average over the last 6 years. If the model is using incorrect data now then what chance has it of accurately predicting what will happen in the future?

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Well let's move onto class sizes. Remember, the Department is arguing they're not really important anymore , despite the fact that they have had a policy on class sizes for decades.

Now, apparently, a class size of 28 is ok, despite OECD average is 21 and that NUT states it should be 23 for infant classes and despite the best education service in the world which is considered to be in Finland and which has average class size of 20.

The issue of class size is hotly debated and you can find an educationalist that will give you any answer you want. But interestingly, those who say class size isn't the most important thing to influence educational outcomes are those who say paying teachers more is. Indeed this has been the thrust of Mr Mulkerrin's comments. He has spoken about the larger the school the higher the salaries teachers should have. Well, we are going to have larger schools if St Andrew's closes, **but nowhere in this report does it factor in this increase in its calculation of net savings.**

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Now from this report you would think that the Department doesn't believe we are getting value for money in our primary education. A fundamental problem with the FTP, which I have alluded to a number of times in this Assembly, including the debates on the States Accounts and Government

Service Plan, is that FTP savings are being looked at on a piecemeal basis, rather than in the round. Making savings in one place can increase costs elsewhere. I feel making decisions like this in isolation has, and will, negatively impact on what we are trying to achieve. We need to bring in zero based budgeting without delay and work from the ground up to decide what we need and want, and how much it will cost. And what we are looking at today perfectly exemplifies it and I will show you how.

At the bottom of the briefing notes sent to us late last week on why 2-3 form entry can improve educational outcomes, it states, and I quote, ‘across the island we could and should be doing better in the primary phase.’

Lets look at the facts.

The average spend per pupil in Guernsey is, according to the report £4,263 against £5,236 before the pupil premium in the UK. That's £1,000 less. Astonishing given the higher cost base in Guernsey. I would say that this is a strong indication of under-investment. Linked to this, Deputy Conder has stated in his presentations about the significant variation in costs per pupils between our schools – from £3,693.71 to £6,211.77. Well there is an even greater variation in the UK from the cheapest at 4428.70, to the most expensive 9372.60. Before pupil premium. Of course there will be variation unless every school is identical with identical children in it. Interesting that, during this time costs per pupil in St Andrew's have fallen in the last 5 years.

So, at a time when it appears we are under-investing in our children's primary education, the Education Dept says that it can, indeed must, cut costs BUT- THIS WILL IMPROVE educational outcomes. I say to you CAVEAT EMPTOR (I know the assembly likes its Latin) If it sounds too good to be true, it probably is LET ME REPEAT IF IT SOUNDS TOO GOOD TO BE TRUE IT PROBABLY IS. If they can do more for less it may well be the first time in the history of the States of Guernsey. Let's be clear, they're not just saying they can do the same with less – they are saying they can actually do more with less. Well, based on their track record I remain to be convinced.

I wonder if the Department could and should do better in the primary phase if they treated their teachers with more respect and actually listened to them? Certainly, the approach they have taken in the development of this report, the fact they didn't consult with their major assets, as they call them in their vision, seems to imply they could do better. As an example, in the briefing note headed ‘what has the greatest impact on teaching and learning? The Department’s total disrespect is shown. As part of their argument that class size doesn’t matter anymore they state ‘unsurprisingly 96% of headteachers and teachers believe that small class sizes have a major impact on children’s

educational experience' and then' this is a subjective assessment which is not borne out by the empirical research on class size and educational achievement'.

Where on earth are they getting their empirical research from if not from the teachers working in the actual classroom with actual children? Perhaps their research draws on the 87% of statistics made up for a specific purpose!

Now I was lucky to be taught by one outstanding teacher in my primary school. I saw her improve the outcomes of children who had been written off and turn their futures around such that some ended up going to university at a time when few did. She was an inspiration to me and I wanted to be a teacher just like her. That was until the consultants came in. It started with the national curriculum and went downhill from there. From what I have worked out it would seem that educational consultants are like Ofsted Inspectors, teachers who couldn't hack it in the classroom.

What makes this report more questionable is that the experts the education department are using are being paid by Capita, who have a financial interest in making short term savings. Therefore, the conclusions that have been reached cannot be relied on to be objective. Like you would never listen to a report advising you of the benefits of smoking if the scientists behind it were funded by British American Tobacco so you shouldn't listen to the educational advantages of closing schools from those paid to close them.

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And that leads me, as inexorably as it must , to the Financial Transformation Programme. The Department claims it can make savings of approximately £600k from closing St Andrew's school through eradicating staff costs. Simple. Efficiency savings banked. Capita get their cut.

However, what about the costs that should be netted off that saving? Somehow absent in this report?

What about the costs of fitting out those classrooms that are currently used for something else?

What about the teachers needed to fill those classrooms?

What about the extra teaching assistants required to support teachers managing larger class sizes?

What about the extra training provision that will be required to match that available in the smaller schools and promised by the Director of Education?

What about the salary increases the teachers will now expect working in larger schools with larger class sizes?

What about the costs of re-opening or expanding schools as the population predictions turn out to be wrong, as they have proven to be in the UK?

And those are only the financial costs. This report is acutely focussed on the department and education in the narrowest sense of the word. It only considers what goes on in the classroom. But you and I know that children don't exist in a bubble, their education is so dependent on other social, environmental and economic factors outside school. Factors that will be adversely affected by the proposals in this report.

Now we accountants are often criticised as being those who know the price of everything and the value of nothing.

But in this case the roles are reversed. Those who you would expect to think about the social impact of their actions have not taken them into account at all. There's a good deal of fluffy educational mumbo jumbo and how direct savings will be made but nowhere, nowhere in these 80 pages or all their briefing notes or presentations do they talk about the wider economic, environmental and social outcomes associated with their actions.

What cost the loss of social cohesiveness for those coming from challenged backgrounds?

What cost the loss of the rich and stimulating outdoor classrooms where children's senses are developed and grown.

What cost the increased pressure on our already congested roads?

What cost to parents of longer journeys?

What cost to our children's health as they are transported around instead of walking to school?

What cost to our community?

And yes these are real costs. I have witnessed the real effect of the closure of schools and the impact on communities. I was at school during the time that whole swathes of rural schools in Devon were closed, decimating local villages. At the same time the classes I was in grew larger year on year. I saw the impact on teachers, coping with larger classes with no additional support and no pay rises either.

It's déjà vu. I chose to leave England and move to Guernsey – I don't want to see Guernsey become a little England.

So this can't be FTP can it? FTP is about doing things better. Now I refer members to section 3.12 of the Budget where it states, 'It is recognised that it is imperative that the FTP targets do not imperil the delivery of frontline services and that suitable projects that can reasonably deliver the agreed targets are developed and monitored.' As is stated in the independent fiscal policy review, there is only so far a policy of efficiency and expenditure restraint can reduce the structural revenue deficit. The revenue deficit has resulted from reduced revenues not uncontrolled expenditure growth. So what is it going to be? is it cutting frontline services? Increasing taxes or cutting capital expenditure? Well we haven't yet signed up to any of these yet, and we certainly can't until we know the outcome of the changes to our personal tax, pensions and benefits system at the very least.

Throughout these last few weeks we've heard every board member say they have been persuaded of the case for closure – though unwilling to say by whom – unelected officials feeding them reports to support what they want to do? If we make these decision now it will cost us in the future. You only have to see what happened at the end of last year when the HSSD Board agreed to close wards for short term savings based on the information they were given, only to result in substantial increased costs as a result of their actions. Are we going to see the same thing here?

The message is simple.

The big savings aren't there. And the costs, both quantitative and qualitative cancel out any small, short term savings arising from disappearing away a few jobs now. And even if there were, why close St Andrew's which has few surplus spaces, is the model of efficiency, has room to grow and adds value socially and environmentally to its community?

So, shouldn't we be looking elsewhere first? Well clearly there are sensitivities in the Department when it comes to their Education Office. We are told in their recent briefing that the Department's army of pen pushers is actually made up of fewer than 60 FTEs. Well based on the fact it cost £4.8m last year that's an average of over £70k per person. Not many teachers will be on that! The last accounts also show that we lost an average of 5 teachers last year at the same time established staff went up by 6. Part of the work done is estate management but given that they have known for 3 years that work has been urgently needed at St Andrew's I wonder what these guys are doing.

Now I said at the start that I would propose an alternative. And there is an alternative that will save money and help educational outcomes and retain a school that the parish does not want to lose. An alternative that is not mentioned in the report in the context of St Andrew and that is to federate.

This is where small schools form a larger unit across several locations, under common leadership and with one governing body. Local authorities in many countries are increasingly looking at Federations as an alternative to closure as they have the upside of cutting costs and without the social downsides. They have become popular as they have resulted in savings and at the same time have raised standards.

This model has been used for many years in the Netherlands where the following advantages have been found;

- principals have more time to lead their schools
- there is economy of scale and averaging of costs (staffing and resources)
- there is mobility of staff and resources
- there is a support and advice network
- there is joint planning and wider thinking

So all the benefits without the disruption to our communities and the negative social and environmental impact that a closure would have.

Something that has also been supported by the Ofsted report of 2011 which stated that in a survey of federations where schools have joined together to raise standards, improvements have been seen in the three key areas of teaching and learning, behaviour and pupils' achievement. Indeed, case studies shown in that report so closely ally with the situation we are facing now that it seems the natural solution.

Fellow members, I usually keep my speeches relatively short but in this case I have had to make an exception. It has been essential for me to convey the number of material errors and omissions in this report. A report written with just one aim in mind from the start – to close a school. As such, the information contained is highly selective and does not set out the full costs of the Education Department's report and consequently it is not objective and must not be relied upon to make a decision that could have serious short, medium and long term consequences not just to one community but the Island as a whole.

These last few weeks I've seen a community in action a community that understands the importance of good education and how a school binds people together – rich and poor, young and old. **[I would like to thank and to commend all those people who have made a contribution to the campaign to save the school for their unstinting efforts, and for their care and commitment to their Parish, and without whom, this debate would already be over]**

When I visited St Andrew's school a few weeks ago I asked the children in Year 6 whether they were happy and each and every one of them shouted yes. Then I asked why and I will quote you now what Emma said to me. She replied, 'because we are one big happy family'. Priceless.

I'm very proud to represent this community in the States of Guernsey and I will continue to do so to the best of my ability.

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We've heard many people here this week talk about the need to make difficult decisions to support FTP. Well here I am asking you all to make a difficult decision. The easy decision here is to side with Education – surely they have the figures and the experts and they assure you that this is all for the greater good and children will be better off, and we'll save money to boot. How could a decision be easier? Make no mistake – the easy decision here is to vote for closure and no doubt some of you here will take the easy decision today. However, the difficult decision is to look deeper – to examine the work done by the unpaid volunteers on the PTA, to look at the contrary evidence of which there is much. The difficult decision is to commit the time to thoroughly reading both sides and coming up with the right answer, the challenging and courageous and clever and correct decision is to vote against closure – Why?

This is not FTP – FTP is not about cutting services, and whatever education may pretend, closing a much loved community school and forcing children into cars and buses to get to school is a cut in frontline services – increasing school and class sizes is a real and recognisable reduction in the quality of education whatever the Minister may try to say to the contrary

This is not FTP because the savings promised are not real –

the reality is here that with a rising school roll we will soon have to spend more money enlarging other schools to cope – is that a real saving?

hiring teachers that have not been budgetted for – is that a real saving?

This is not FTP because FTP is about doing things more efficiently – I put it to you that this proposal we will be providing a lesser education at a potentially higher cost.

This is not about educational outcomes and it's not going to save money – The huge pressure here is toe the line, give in to the persuaders (whoever they are), to vote with the education department and close the school – that must be the easiest decision for any deputy. The hard decision is to see the big picture, understand the real issues and resist the faceless, unelected forces pushing for closure – so yes –make the difficult decision that Guernsey as an Island will benefit from for generations to come – vote against closure, vote against bigger schools, vote against wasted money.

I know that several deputies have deliberately held back to speak after me today, and I hope that they will have listened fairly and given due thought to the concerns and doubts raised, and respond in a respectful and appropriate manner.

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I want to finish with a few words by WH Auden, such a talented poet who manages to sum up in 3 short lines what it has taken me 11 pages to read today;

Time will say nothing but I told you so
Time only knows the price we have to pay;
If I could tell you I would let you know.

Now fellow Members, ladies and gentlemen of the jury. Can you be sure, beyond all reasonable doubt, even on the balance of probabilities that St Andrew's school should be allowed to die. Is the case against it cast iron and are you sure that it will have proven to have been the right decision 5, 10 or 20 years from now?

Or will time say nothing but I told you so?

I urge you for the sake of a school, a community, and our Island life, say no to closure and yes to a brilliant social, environmental and educational outcome for all our children, now and in the future.