Office of the Schools Adjudicator

Determination

Case reference: **VAR2824**

Admission Authority: **Gloucestershire County Council for Woolaston Primary School**

Date of decision: **12 November 2026**

Determination

In accordance with section 88E of the School Standards and Framework Act 1998, I approve the proposed variation to the admission arrangements determined by Gloucestershire County Council for Woolaston Primary School, for 2027/28.

I determine that for admission in 2027/28 the published admission number shall be 15.

I have also considered the arrangements under section 88I(5) and find that they do not comply with requirements relating to admission arrangements in the ways set out in this determination.

By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code requires the admission authority to revise its admission arrangements within two months of this determination, unless an alternative timescale is specified by the schools adjudicator. In this case, I require the Admission Authority to revise its Arrangements within one month for the reasons set out in the determination.

The referral

1. Gloucestershire County Council (the Admission Authority) has referred to the adjudicator a proposal for a variation to the admission arrangements for Woolaston Primary School (the School) for 2027/28 (the Arrangements).

2. The School is a community school for children aged four to eleven years in Netherend, Lydney. It is a co-educational, non-selective primary school with no designated religious character. It is federated with Tutshill Church of England (C of E) Primary School

and is part of the Forest Edge Federation (the Federation). Parties to the request are the School and the Local Authority.

3. The local authority for the area in which the School is located is Gloucestershire County Council (the Local Authority). As the Local Authority is the Admission Authority, both terms are used throughout this determination.

4. The proposed variation is that the published admission number (PAN) be reduced from 30 to 15 for admission to Reception Year (YR) in the academic year beginning in September 2027.

Jurisdiction and procedure

5. Section 88E of the School Standards and Framework Act 1998 (the Act) makes provision for variations to determined arrangements. Paragraphs 3.6 and 3.7 of the School Admissions Code (the Code) say (insofar as is relevant here):

> "3.6 Once admission arrangements have been determined for a particular school year, they cannot be revised by the admission authority unless such revision is necessary to give effect to a mandatory requirement of this Code, admissions law, a determination of the Adjudicator or any misprint in the admission arrangements. Admission authorities may propose other variations where they consider such changes to be necessary in view of a major change in circumstances. Such proposals **must** be referred to the Schools Adjudicator for approval, and the appropriate bodies notified. Where the local authority is the admission authority for a community or voluntary controlled school, it **must** consult the governing body of the school before making any reference.
>
> 3.7 Admission authorities **must** notify the appropriate bodies of all variations".

6. The Arrangements were determined by the Admission Authority on 28 January 2026.

7. The Admission Authority has provided me with confirmation that the appropriate bodies have been notified of the proposed variation in line with the Code.

8. I find that the appropriate procedures were followed, and I am satisfied that the proposed variation is within my jurisdiction.

9. I have also used my power under section 88I of the Act to consider the Arrangements as a whole and to determine whether or not they conform with the requirements relating to admissions and, if not, in what ways they do not so conform. I will refer to these as 'other matters' and they are covered in the section of the determination under that name.

10. In considering the variation request and the matters considered under section 88I, I have had regard to all relevant legislation and the Code.

11. The information I have considered in reaching my decision includes:

- the referral from the Admission Authority dated 2 November 2026 and supporting documents;
- the determined Arrangements for 2027/28 and the proposed variation to those Arrangements;
- responses from the Local Authority and the School to my requests for further information;
- maps, including Google Maps and those showing the location of the School; and
- information available on the websites of .GOV.UK (including 'Get Information About Schools' (GIAS) and 'Financial Benchmarking and Insights Tool' (FBIT)), the Local Authority and the School;

12. I would like to extend my thanks to the Local Authority and the School for their timely responses to my requests for further information.

13. There is no formal consultation required for a variation and so parents and others do not have the opportunity to express their views. Clearly, it is desirable that changes to arrangements are made via the process of determination following consultation as the consultation process allows those with an interest to express their views. It also allows for objections to the adjudicator. None of this is afforded by the variation process.

14. I note here that the Arrangements for 2028/29 have not yet been determined. This means that if I decide to approve the proposed variation to the Arrangements for 2027/28 by reducing the PAN from 30 to 15 as proposed, it will have the effect of forming the 'baseline' for subsequent years. However, I also note that the LA are consulting on reducing the School's PAN for 2028/29 from 30 to 15 as part of a wider consultation on its admission arrangements. I will, therefore, only consider the impact of the proposed reduction in PAN on entry to YR in 2027/28.

Consideration of proposed variation

15. The Admission Authority has proposed that the PAN of the School is reduced from 30 to 15 for entry to YR in September 2027. The proposed variation has the support of the School's Governing Body.

16. Paragraph 3.6 of the Code (as above) requires that admission arrangements, once determined, may only be revised, that is changed or varied, if there is a major change of circumstance or certain other limited and specified circumstances. I will consider below whether the proposed variation is justified by the change in circumstances.

17. The Admission Authority told me that the reason for it seeking a variation for the School is:

> "The school faces a severe, structural risk to its financial viability and operational stability due to a sustained drop in local pupil intakes. To prevent a catastrophic

budget deficit and avoid compulsory staff redundancies, the Governing Board has already compressed the school's structure down to just four mixed-age classes for the upcoming 2026/27 academic year. Retaining an unmanaged legal PAN of 30 for the 2027/28 intake threatens to completely destroy this recovery framework by legally forcing the school to open a fifth class that it cannot afford to staff."

18. I have given careful consideration to the latest available data in order to form a view about the sufficiency of school places in the local area if the PAN of the School were to be reduced from 30 to 15 for 2027/28. I have also considered the demand for places at the School, the reasons given for the change in demand, the potential effect of the proposed PAN reduction on meeting parental preference, and whether the proposed reduction is justified taking into account all relevant circumstances.

19. The Local Authority has a duty to ensure that there are sufficient places for the children in its area. To fulfil this duty, it assesses the likely future number of places to be needed and plans to meet that need. The Local Authority uses planning areas, which are geographical areas and the schools within those areas, for this purpose. The School is based in the Tidenham planning area. There are four primary schools in the planning area, including the School, that admit children to YR.

20. Table 1 summarises data for the schools in the planning area that admit children to YR from 2024/25 through to 2028/29.

Table 1: Summary of YR school admissions and vacant places in the planning area. (based on data provided by the LA on 2 November 2026)

	2024/25 Actual	2025/26 Actual	2026/27 Actual	2027/28 Forecast	2028/29 Forecast
Offa's Mead Academy	7	30	10	15	20
St. Briavels Parochial C of E Primary School	20	15	11	11	10
Tutshill C of E Primary School	30	30	30	30	25
Woolaston Primary School	17	10	12	12	17
The total number of children admitted or forecast to be admitted in the area	74	85	63	68	72
The sum of the PANs	110	110	110	95*	90**
The number of vacant places	36	25	47	27	18
The number of vacant places as a percentage of the total number of places	33.3	22.7	42.7	28.4	20

* This assumes that the proposed reduction in PAN for the School is agreed.

** This assumes that a proposed reduction in PAN from 20 to 15 for another school in the planning area from September 2028 is agreed. This has not yet been determined.

21. Table 1 shows that the numbers of pupils admitted, or forecast to be admitted, to each school, and across the area as a whole, fluctuate from year to year. It also shows that there is a high number of surplus places, even if the proposed reduction in PAN for the School is agreed. The percentage of vacant places is considerably higher than the minimum requirement of two per cent referred to in the DfE document “Basic need allocations 2026-27 and 2027-282025-26: Explanatory note on methodology”.

22. I am satisfied that there would be sufficient places in the area for any child requiring a place in YR in 2027/28 if I agree to the proposed reduction in PAN. However, I note that the other schools in the planning area are located more than two miles from the School. As a child under the age of eight is eligible for free travel to their nearest suitable school if it is more than two miles from their home, the Local Authority might have to facilitate free-of-charge travel arrangements should a child be unable to secure a place at the School.

23. The School told me that it has experienced falling pupil numbers for a number of years and that, with the help of the Local Authority, it has reviewed its class structure in response to the financial pressures created by declining pupil numbers. It has recently moved from a five-class structure to a four-class structure: early years (YR); key stage 1 (Years 1 and 2); lower key stage 2 (Years 3 and 4) and upper key stage 2 (Years 5 and 6). The School said that this "is the model that the proposed reduction in PAN would enable us to maintain on a sustainable basis". The School said that without a reduction in PAN, the School may need to appoint additional teaching staff which would create "an additional staffing cost … at a time when the school is already forecasting a budget deficit".

24. The School went on to say that:

> "Reducing the PAN would help ensure the long-term sustainability of the school by aligning pupil numbers with available accommodation, staffing structures and financial resources while maintaining high-quality educational provision."

25. With regard to its financial situation, the School told me:

> "Whilst the school is still forecasting a deficit budget, moving to a four-class structure has reduced expenditure and slowed the rate at which the deficit increases. This change has already had a positive impact on the school's financial position and represents a more sustainable staffing model based on current pupil numbers.
>
> The proposed reduction in PAN will further support this work by allowing the school to maintain a stable four-class structure over time. A reduced PAN would provide greater certainty in pupil number projections, enabling more effective financial planning and reducing the need for reactive staffing changes resulting from fluctuations in cohort sizes."

26. The School is subject to the provisions of the School Admissions (Infant Class Sizes) (England) Regulations 2012 (the Infant Class Sizes Regulations). The Infant Class Sizes Regulations require that early years and key stage 1 classes (those where the majority of children will reach the age of five, six or seven during the school year) must not contain more than 30 pupils with a single qualified schoolteacher, except in specific exceptional circumstances. A PAN of 15 children would ensure that, overtime, there would be no more than 30 children in the key stage 1 class, and the School can plan its staffing structure with more certainty.

27. Table 1 forecasts 12 children will require a place in YR at the School in 2027/28. From forecast data provided separately by the Local Authority for 2026/27, I can see that the Local Authority slightly overestimated the number of places required both in the planning area and at the School. The School has also told me that "historically, [it has] not received the full number of pupils forecast within Reception cohorts". I am, therefore, satisfied that the reduction in PAN will have little or no impact on meeting parental preferences in 2027/28.

28. Taking everything into consideration, I am of the view that the variation is justified by the circumstances, and I approve the proposed variation to reduce the PAN for 2027/28 to 15.

Other matters

29. Having considered the Arrangements as a whole it appeared to me that there are matters which may not conform with the requirements of the Code and so I brought them to the attention of the Admission Authority. These matters are (paragraphs of the Code are indicated where relevant):

- Appendix A. "Admissions Criteria for Community and voluntary Controlled Infant and Primary Schools in Gloucestershire September 2027" lists three oversubscription criteria but then states "In the event of a tie between two or more children when applying criterion 4…"

  This may be confusing for parents and is in breach of paragraph 14 of the Code which states, in part: "Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated."

- Section 4. Sibling Definition, Appendix A. "Admissions Criteria for Community and voluntary Controlled Infant and Primary Schools in Gloucestershire September 2027" and Appendix B. "Admissions Criteria for Community and voluntary Controlled Junior Schools" refer to 'companion' infant and / or junior schools. However, the Arrangements do not provide any information about which schools are 'companions' to each other. This is also potentially confusing for parents and so is in breach of paragraph 14 of the Code.

- Section 16. Waiting Lists states: "Where any school is oversubscribed during the normal admission round for entry to the school (i.e. where all children requesting a place at a particular school have not been allocated one) the waiting list will be held until the end of the academic year. All waiting lists will be prioritised according to the school's oversubscription criteria, regardless of the date the application was made, and should any places become available at the school they will be offered to the child at the top of the waiting list."

  This is in breach of paragraph 2.15 of the Code which states, in part: "Each admission authority must maintain a clear, fair, and objective waiting list until at least 31 December of each school year of admission, <u>stating in their arrangements that each added child will require the list to be ranked again in line with the published oversubscription criteria.</u> (my underlining).

30. The Admission Authority has told me that it will address these matters, as permitted by paragraph 3.6 of the Code, which is welcomed. As the Admission Authority has accepted that changes are required, I will not discuss them further other than to make clear that the Code requires that the Arrangements be amended to address the points set out here.

31. The School Admissions Code requires the Admission Authority to revise its Arrangements within two months of this determination, unless an alternative timescale is specified by the schools adjudicator. In this case, I require the Admission Authority to revise its Arrangements within one month. This is because the national closing date for primary school applications for 2027/28 is 15 January 2027. As a result, many parents seeking a Reception place for their child in September 2027 will be actively considering for which schools to apply. Parents may well consider a school's arrangements as part of that application process. Revising the Arrangements within a month will allow parents to apply for a place in 2027/28 using arrangements that conform with requirements of the law relating to admissions.

Determination

32. In accordance with section 88E of the School Standards and Framework Act 1998, I approve the proposed variation to the admission arrangements determined by Gloucestershire County Council for Woolaston Primary School, for 2027/28.

33. I determine that for admission in 2027/28 the published admission number shall be 15.

34. I have also considered the arrangements under section 88I(5) and find that they do not comply with requirements relating to admission arrangements in the ways set out in this determination.

35. By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority. The School Admissions Code requires the admission authority to revise its admission arrangements within two months of this determination, unless an alternative timescale is specified by the schools adjudicator. In this case, I require the Admission Authority to revise its Arrangements within one month for the reasons set out in the determination.

Dated: 12 November 2026

Signed:

Schools Adjudicator: Catherine Crooks