

CABINET

Wednesday, 30 October 2019 at 5.00 p.m.
C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London,
E14 2BG

SUPPLEMENTAL AGENDA

The meeting is open to the public to attend.

Contact for further enquiries:

Matthew Mannion, Democratic Services,
1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG
Tel: 020 7364 4651
E-mail: matthew.mannion@towerhamlets.gov.uk
Web: <http://www.towerhamlets.gov.uk>

Scan this code
for an
electronic
agenda:



For further information including the Membership of this body and public information,
see the main agenda.

**PAGE
NUMBER(S)** **WARD(S)
AFFECTED**

**6 .2 Report on the outcome of the public consultation on
the closure of Raine’s School and the expansion of
Oaklands School**

412 - 883

All Wards

Agenda Item 6.2

Cabinet Decision 30th October 2019	 TOWER HAMLETS
Report of: Debbie Jones, Corporate Director, Children's Services	Classification: Unrestricted (Apart from Appendix 12)
Outcome of the public consultation on the proposed closure of Raine's School and the proposed expansion of Oaklands School.	

Lead Member	Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People
Originating Officer(s)	Terry Bryan, Service Head (Pupil Services and School Sufficiency)
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	To be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the relevant local authority.
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential

REASONS FOR URGENCY

The report was not published five clear days in advance of the meeting. This is due to the additional time required to review the large volume of appendices in order to provide Finance and Legal clearance. If the outcome of the consultation is not considered at this meeting, it will impact on the council's ability to commence the second stage consultation, if that is its decision, and may cause uncertainty for the students and the school community.

REASONS FOR EXEMPT PAPERS

Appendix 12 contains information that is exempt by virtue of section 100A of the Local Government Act 1972 and paragraph 2 of Schedule 12A of the Local Government Act 1972 (information that is likely to reveal the identity of an individual). The public interest in withholding the information outweighs the public interest in disclosing it because disclosure would be likely to identify the identity of the individuals as although names and addresses of parents and children have been redacted, there is sufficient information within the documents that may enable identification by the public and in particular, by other members of the school community.

Executive Summary

This report is to inform Cabinet of the outcome of the first stage of the statutory consultation process in respect of the proposal to cease to maintain Raine's School, and plans to expand nearby Oaklands Secondary School for the transfer of Raine's pupils.

The report explains the background and reasons for the first stage of the consultation; the responses received with the views of Raine's and Oaklands' parents, pupils, staff and the general public; and the LA's response.

It also sets out the risk implications and how these will be managed through the various stages of the process, should the process continue.

RECOMMENDATIONS:

- A) To consider the outcomes of the informal stage of consultation and Equality Impact Analysis.
- B) Consider whether to publish a Statutory Notice and Proposal for the closure of Raine's Foundation Trust School;
- C) Subject to (B) above being answered in the affirmative, agree to proceed to the next stage of the statutory consultation by publishing the Notice in order to initiate the Statutory Representation Period to run from 4th November to 2nd December 2019.
- D) Note that further proposals are being developed with respect to the potential expansion of Oaklands School.

1. REASONS FOR THE RECOMMENDATIONS

- 1.1 The recommendations are made in order to determine the Council's response to the consultation on proposals to close Raine's School and expand Oaklands School.
- 1.2 Prior to determination of the initial proposals a number of alternatives were explored to support a sustainable future for Raine's School. These were discussed in detail with the London Diocesan Board and Interim Executive Board for Raine's School in meetings on 16th and 30th November 2018. Unfortunately none were found to be viable. These alternatives together with explanations of why they could not be pursued are set out in Appendix 5.
- 1.3 It is therefore recommended that the procedure of publishing a statutory proposal in respect of the closure of Raine's School should be progressed.
- 1.4 Further proposals are being developed in respect of expansion Oaklands School. Dependant on the pathway proposed, a further report will be presented for consideration by the Mayor in Cabinet to ensure that the required statutory process is followed.

2. ALTERNATIVE OPTIONS

- 2.1 Cabinet could decide not to proceed to the next stage of the statutory consultation. In which case the LA would not be able to proceed with the closure proposal for Raine's School and the Council would then have to decide on

how the School's increasing budget deficit would be funded beyond the 2019/20 school year, given that it is not financially viable at its current size and is most unlikely to see a sufficient increase in its pupil numbers for the situation to change in the foreseeable future.

- 2.2 Cabinet could decide to delay its decision on proceeding to the next stage of the statutory consultation, but this would mean that the School's financial position would be very likely to worsen, further impacting on the quality of education for its current pupils and leaving an even bigger budget deficit, should the school close later than the proposed date of August 2020. Officers are convinced that it would not be possible for Raine's School to provide pupils with a rounded education that meets their academic, social and emotional needs and, consequently, any delay would not be in the best interests of educational provision in the area.
- 2.3 Cabinet could seek to make provision for the displaced Raine's pupils in a number of other schools across the Tower Hamlets area, where there is capacity to do so, rather than the further proposals continuing to be developed to expand Oaklands. This would mean that Oaklands School will not be expanded in connection with the current proposal, but it would mean some children in the Bethnal Green area having to travel greater distances to alternative schools.

3. DETAILS OF THE REPORT

- 3.1 The purpose of the report is to inform Cabinet of the outcome of the initial statutory consultation in respect of the proposal to cease to maintain Raine's School, and to expand nearby Oaklands Secondary School for the accommodation of displaced Raine's pupils.
- 3.2 Cabinet is asked to consider the outcome of the consultation, in taking a decision as to whether it wishes to proceed with the publication of a statutory proposal and notice in respect of the proposed closure (Appendix 1). This in turn triggers the 'statutory representation period' which is, in effect, a second consultation. If agreed, the proposed publication date for the notices would be 4th November 2019.

4. INTRODUCTION

- 4.1 The Director of Children's and Culture agreed to proceed with the statutory consultation on the proposals to close Raine's School and expand nearby Oaklands School for the transfer of Raine's pupils. The main facts on the background to this decision, and current position of Raine's and Oaklands Schools, are set out below, with the detailed information from the consultation paper (attached as Appendix 2).

5. BACKGROUND

- 5.1 Local Authority Officers and the London Diocesan Board for Schools (Diocese) have had increasing concerns about the long term sustainability of Raine's Foundation CofE School and how they could work together to secure its future. These concerns were focused on its financial viability, set against a backdrop of declining pupil numbers together with the capacity of the School to achieve a sufficiently rapid improvement in pupil behaviour, progress and outcomes. The number of pupils enrolled at Raine's has been steadily declining, from 808 at the January census in 2012, 747 in January 2014, 669 in January 2016 and

520 pupils in January 2019. The current pupil numbers are well below the School's target of 800 and less than half its planned capacity for 1050 pupils.

- 5.2 It should be noted that, in 2013, the governing body of Raine's School applied to the Secretary of State for the Department of Education (DfE) to convert to academy status. The application made by the then Chair of Governors was refused by the DfE (Appendix 3). In refusing the application the DfE explained that, although Raine's was rated by Ofsted as a 'good school with outstanding features' the rate of pupil progress and GCSE results were below the national standard. There has been no further opportunity for Raine's to convert to academy status, given that what followed were two Ofsted inspections in November 2015 and October 2017, which found that the School 'required improvement' due to its poor governance, leadership and its further decline in pupil progress and standards (Appendix 4). The subsequent monitoring visit by HMI in December 2018 found 'Senior leaders and the interim executive board (IEB) are taking effective action to tackle the areas requiring improvement identified in the last section 5 inspection in order for the school to become good' however this improvement was in relation to the 'parlous position the school was in at the end of the summer term' when a previous unannounced visit was made by Ofsted.
- 5.3 In considering ways for Raine's to secure its future and provide a better quality of education for its pupils, the LA and Diocese considered different courses of action; including Raine's federating with another school or amalgamating with an existing Church of England school. None of these was considered viable and this is detailed in Appendix 5.
- 5.4 The above activities established that no identifiable alternative options for securing a future for Raine's School could be pursued further. It was therefore necessary for the LA and Diocese to consider a process whereby the School would close. The LA, with agreement from both the Interim Executive Board for Raine's School and the governing body of Oaklands School, conducted a feasibility study on arrangements for the closure of Raine's alongside the expansion of nearby Oaklands to accommodate former Raine's pupils who would thereby be displaced. Oaklands was chosen because:
- it had effective governance and strong leadership;
 - it was in the right geographical location;
 - it is popular with local families;
 - it is 4FE school with potential to add more capacity through expansion;
 - it was well placed to provide a good education to additional pupils.
 - It was already providing support to Raine's as part of the LA's earlier intervention plan.
- 5.5 Following the completion of the feasibility study and its findings the Interim Executive Board for Raine's School, the governing body of Oaklands School, LA officers, and the Diocese determined to seek agreement from the Director of Children's and Culture for the LA to begin a statutory consultation process that would consider the closure of Raine's School, alongside the expansion of Oaklands School. The schools also agreed to establish a joint steering group, with an independent chair, to oversee the process.

6. CURRENT POSITION

6.1 The LA determined to consult on the closure of Raine's School and to the following timescales for the statutory process, should each stage of the process progress to the next (which will be determined at each stage):

Stage	Description	Timescale	Comments
1.	Consultation	No prescribed timescale but recommended to be a minimum of 6 weeks, taking into account and avoiding where possible school holiday periods.	Public consultation from 10 th June 2019 to 31 July 2019 (seven weeks). Including publication of consultation materials and public meetings. Following consultation, where Cabinet approval is given, the Council will be required to publish a statutory notice. Cabinet to be held 25th September 2019.
2.	Publication of Statutory Notice	1 day	Propose to publish statutory notice on 4 th November 2019 Publication of the statutory notice commences the statutory Representation Period. Within 1 week of date of publication, the Proposer must send a copy of the full proposal to the governing body, Secretary of State, the CofE and RC Dioceses, Council of Mosques and any other body or person that the Proposer considers appropriate.
3.	Representation	Four weeks from date of publication of Statutory Notice	Representation Period to end 2 nd December 2019. Formal consultation of statutory and other stakeholders including but not limited to: <ul style="list-style-type: none"> - Governing Body - Parents of pupils at the school - Teachers and staff at the school - Any LA likely to be affected, including neighbouring authorities where there is significant cross border movement of pupils - Governing bodies, teachers and staff of any other school that might be affected, including any feeder schools and schools to which pupils may be dispersed (e.g. Oaklands) - Parents of pupils at any other school that might be affected, including any feeder schools and schools to which pupils may be dispersed (e.g. Oaklands) - Trades Unions - MPs for the constituencies of the school(s) that is subject to the proposal or whose constituents may be affected. - Any other interested organisation/person that the proposer considers appropriate (Raine's Foundation Trust, related organisations, etc.) <p>During the Representation Period, any person or organisation can submit comments to the LA on the proposal to be taken into account by the Decision Maker. Any requests for a copy of the full Proposal must be sent out to the person requesting it within 1 week of receiving the</p>

			request.
4.	Decision	LA should decide within 2 months, otherwise it must be referred to the Schools Adjudicator	<p>Key Decision: Formal report to Cabinet setting out summary of representations received and any responses made, risks and opportunities, officers recommendations and decisions available to Cabinet (approve without modification, approve with modifications, approve (with or without modification) subject to conditions as specified in the Establishment and Discontinuance Regulations, or reject)</p> <p>The timescales for publication of the Notice and conclusion of the Representation Period will identify the 2 month decision making period. The decision is proposed to be taken at Cabinet on 29th January 2020</p>
5.	Implementation	No prescribed timescale however the date of implementation must be specified in the published notice, and is subject to any modifications imposed by the Decision Maker Consideration can be given in the Proposal for phased implementation plan for closure and impact upon pupils taking or due to take statutory examinations during the phases of implementation	<p>Subject to the outcome of the representations and decisions made, proposal to implement the closure as follows:</p> <p>September 2019 – July 2020 No changes: Years 7, 8, 9, 10, 11, 12 and 13 to continue at Raine’s. Parents have been advised that, in the event the Year 7 and 12 groups at Raine’s are very small, Raine’s may consider exercising its management powers to provide the education for their children at the site of an alternative school, to enable them to receive a suitable curriculum.</p> <p>September 2020 No year 7 (Parents wishing to express a preference for this year would be informed of the potential for closure in 2020 as part of the Autumn term admissions round 2019)</p> <p>September 2020 School is closed from 31st August 2020 Years 8, 9, 10, 11 allocated to Oaklands School for September 2020. Parents can apply for their children to attend alternative schools.</p>
6.	Closure	Proposed closure date.	Raine’s School officially closes on the 31 st August 2020.

6.2 It should be noted that although the timescale was agreed for the Consultation process, the Council is able to halt or delay the process at any point if a credible alternative option is identified during the consultation period. This would need to include identification of a credible plan to resolve the viability challenges of Raine’s School.

6.3 As a consequence of a legal challenge brought on behalf of a student at the school in respect of the consultation, a decision was taken to delay this report being brought to Cabinet to 30th October 2019, when the outcome of the court hearing would be known. The challenge was unsuccessful, as the Council’s consultation process was held to comply with legal requirements.

7. CONSULTATION

7.1 The first stage of the consultation process was undertaken from 10th June 2019 to 31st July 2019.

- 7.2. Options for consultation were necessarily limited to the proposal for the closure Raine’s School and the expansion of Oaklands School to receive pupils transferring from Raine’s. However, views expressed during the informal consultation will help to inform Cabinet’s decision on whether to agree to proceed to the statutory publication of that proposal and, if so, the timescale and phasing of its implementation.
- 7.3 Consultation information, a list of frequently asked questions (updated at points during the consultation), and an online consultation response form were published on the Council’s website. All parents at Raine’s and Oaklands Schools received notice of the above and the dates of public consultation meetings. Copies of the information and response forms were also available at the public meetings, attached as Appendix 2.
- 7.4 Prior to the start of the consultation, the Director of Children’s and Culture and LA officers held a series of preparatory meetings with Raine’s School to discuss the background and process for the consultation. These included separate meetings with the head teacher and chair of governors, the governing body, the school’s senior leadership team and school staff. The following formal meetings were then held as part of the consultation, to give consultees the opportunity to ask questions and make their views known:

13 th June 2019	Trades Unions and Teacher Associations
19 th June 2019	Public meeting for parents, carers, staff and the local community held at 6pm at Oaklands Community School.
25 th June 2019	Council Overview and Scrutiny Sub-Committee. This meeting was open to the public to attend.
26 th June 2019	Public meeting for parents, carers, staff and the local community held at 6pm at Raine’s Foundation School.
26 th June 2019	Meeting of Tower Hamlets Headteachers’ full consultative.

- 7.5 Notes are available from the public meetings, recording the points and questions raised in these discussions, rather than verbatim minutes. These are attached as Appendix 6.
- 7.6. Views expressed by pupils at the public meetings have been captured in the general notes of the meetings. In addition, support was offered to pupils in understanding the proposal and the process undertaken, seeking to reassure them that they will be fully supported throughout this period.

8. **RESPONSES**

- 8.1 A petition to stop the closure of Raine’s Foundation School was presented to Council at its meeting on 17th July 2019. The petition has been signed by 3,190 people on the change.org website (<https://www.change.org/p/tower-hamlets-council-stop-the-closure-of-raines-foundation-secondary-school/u/24698349>) (at 11:12am 5 August 2019). 324 petitioners left comments and an analysis summary of these and the other responses is presented as Appendix 7. Copies of all the responses to the Public Consultation can be accessed via the link attached as Appendix 8 (https://www.towerhamlets.gov.uk/lgnl/council_and_democracy/consultations/Proposal-to-close-Raines-Foundation-School.aspx)

8.2 During the consultation period a legal challenge by way of Judicial Review was launched on behalf of a pupil at Raine’s by her parent. The Local Authority strongly resisted the contention that its actions had been in any way unlawful and the move failed to secure an injunction that would have halted the consultation. The application for permission to apply for Judicial Review was also refused by the court, but the claimant then applied for oral reconsideration of the judicial review claim. This was again refused permission at the oral hearing. The LA has taken a decision to include the statements submitted in the court proceedings, together with the skeleton arguments by the claimant and Council as responses to the consultation, to be taken into consideration when taking a decision on whether to publish a statutory notice. They have also been considered when preparing the Equality Impact Analysis. These are available for the Mayor and Cabinet to consider as exempt papers (Appendix 12).

8.3 By the formal close of the consultation, the following further responses were received and are also included in the report on the analysis of consultation responses:

1. 7 emails
2. 102 responses to its on-line questionnaire
3. 205 responses to its questionnaire from Oaklands students
4. A formal response from Raine’s School Foundation

8.5 The 102 respondents to the on-line questionnaire identified themselves as follows (some respondents’ ticked more than one category):

Parent carer of a child / ren at Raine’s Foundation School	34
Parent / carer of a child / ren at Oaklands School	3
Member of staff at Raine’s Foundation School	5
Member of staff at Oaklands School	2
Pupil at Raine’s Foundation School	8
Pupil at Oaklands School	1
Member of Raine’s Foundation Trust	5
Local Resident	19
Ex-Raine’s student or staff	30
Other	3
Prefer not to say	11

8.3 The number of pupils on the Raine’s School roll at the beginning of the consultation was 520 and the number of staff was approximately 58. Responses to the consultation were received from 34 parents/carers and pupils and 5 members of staff. The remaining responses were from residents and other interested parties.

8.4 The first four questions of the consultation response form asked respondents to confirm their name; email address; whether they had read the consultation paper; and their particular interest. The remaining four questions asked respondents to comment on the proposed Raine’s closure and the planned expansion of Oaklands, as well as inviting them to put forward alternatives to the options being considered.

8.5 The majority of respondents opposed the proposed closure of Raine’s School. This included 84 of the 102 respondents using the online questionnaire, 7 responses received via email and the response on behalf of the Raine’s Foundation Charitable Trust. The majority of respondents also opposed the expansion of Oaklands School. This included 67 of 102 respondents using the

online questionnaire, 7 responses received via email and the response from the Raine's Foundation Charitable Trust.

8.6 Although the main focus from the majority of respondents was to object to the proposals, there were some alternative suggestions. The general themes from the responses, including the LA response are as follows:

- The contention that the school has made significant improvement.
- The concern that the proposal to close Raine's is simply a means of the council saving money.
- That parental preference for Raine's for September 2019 was made in the Autumn Term and before the school started to show signs of recovery.
- The concern that the school be given more time for another Ofsted inspection, which would, it is argued, result in the school being placed in a 'Good' category.
- The disruption and negative impact on the education of current pupils, particularly those in current Year 9.
- The potential closure of a relatively new school building.
- The concerns around additional travel costs, impact local services, cost of new uniform etc.
- The concern that more time should be given to look at a federation or amalgamation with other 'like-minded' schools.

Question 5 - Do you have any comments on the proposed closure of Raine's Foundation School?

There are 14 main themes to the responses, summarised below:

- i. Church of England School (CofE) - The closure of Raine's will result in the loss of one of the Borough's two CofE secondary schools. This resulting reduction of choice available to families seeking a faith school for their child/ren was criticised.

LA Response: The LA is under an obligation to consider the impact on the balance of denominational provision in the area before it determines the outcome of school closure proposals. As there is another CofE secondary school as well as other faith schools in Tower Hamlets and surrounding areas, the proposed closure will have minimal impact on the balance of faith school provision. A CofE secondary school option would continue to be available in Tower Hamlets at Sir John Cass Foundation as well as at The Urswick School in nearby Hackney. There would also be other faith school places accessible in Tower Hamlets at Bishop Challoner and Canary Wharf secondary schools.

There has been a significant decline in the number of applications for children from CofE primary schools to Raine's over recent years and this mirrors the decline in the borough's Christian population as evidenced by the last national census¹, where Tower Hamlets had the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent.

¹ Source: ONS, 2011 Census (revised data issued by ONS 26.02.15) and 2001 Census (Table KS07).

- ii. History, tradition and former reputation - Attention was drawn to the 300-year history of Raine's Foundation School, and to the loss of the traditions and continuity of education provision that would result. This view was most strongly expressed by former students and staff.

LA Response: The LA is acutely aware of the history, traditions and past performance of Raine's Foundation as a provider of education to the children of East London, as well as the importance of keeping the name of Henry Raine alive in the borough. If a final decision is made to close the school, a commitment has been made to the Raine's Foundation Trust to consider ways in which the legacy and name of Raine's can be preserved within the borough of Tower Hamlets.

- iii. Assumption that future improvement is not an option for Raine's - Several respondents made the point that with sufficient investment, leadership, determination and support from LBTH and LDBS, it may still be possible to halt the decline of Raine's and to begin to restore its popularity and pupil numbers.

LA Response: Raine's School was rated as 'Good' in the 2012 Ofsted Inspection. However both the Inspections in 2015 and 2017 rated the school as 'Requiring Improvement'. Since then GCSE results, particularly in core subjects, have significantly declined and, although the school did receive a positive monitoring report from Ofsted in December 2018, it still remains as a school 'Requiring Improvement'. Whilst it has been clearly explained that the consultation on potential closure is not about standards at the School, this longstanding 'Requiring Improvement' judgement would be a significant factor working against any further attempts to improve its popularity and increase pupil numbers.

The LA and school leaders have invested significant time, effort and determination to improve the performance at Raine's, including the appointment of experienced Interim Executive headteachers from Sir John Cass, then Oaklands School to raise standards. However, this has not prevented the decline in pupil numbers, which has led to the School now facing significant financial liabilities. This has restricted the curriculum offer and resources to the extent that it is difficult to see how the school will be able to continue without these challenges, harming the quality of pupils' education in the medium term. There is also currently no evidence that the school has the capacity or resources to rebuild, without further substantial financial investment – which the LA is no longer in a position to provide, given that the DfE has limited the period of a Licensed Deficit to three years.

- iv. Criticism of the LA and others for allowing Raine's School to decline - Allied to the argument made at point iii. above, several respondents suggested that Raine's School was being proposed for closure as result of the failings of others, including the LA. Allegations have been made that the LA deliberately placed a large number of challenging students at the School.

LA Response: The LA has been supporting Raine's with its efforts to manage its pupil intake over a number of years. This work has included suspending admission of pupils under the Local Fair Access Protocol, to prevent Raine's from having to admit pupils with history of challenging behaviour. There has also been significant investment in the development of the School's 6th Form, however, this did not result in a significant boost in pupil numbers.

- v. Deliberate undermining of Raine's School ahead of the conclusion of the consultation - Complaints were made about the closure of the September 2019 intake and the actions of staff who have discouraged prospective students from choosing Raine's and encouraged existing students to transfer thus weakening the evidence for Raine's survival. Lack of marketing and advertising of the school was also criticised.

LA Response: Parents have not been encouraged to move their children from Raine's. On 7 May 2019, the LA decided to rescind the offer of places to year 6 students to attend the school in year 7, and year 11 students to attend or apply to the School's 6th Form for 2019-20 on the basis that there was a proposal to close the School and if it was passed, it would severely disrupt these students' education. In July 2019, the LA revoked that initial decision and both wrote to parents of affected potential year 7 students (on 19 July 2019) and updated the school website to make clear that the offers and acceptances of places for pupils in year 7 and year 11 intake are valid, if the parents choose to send their children to Raine's. The LA has also informed parents of the proposal for Raine's School to close in August 2020, in order that they may make an informed decision. A substantial number, particularly those parents of children in Year 9, have applied for other schools as they want to be certain that their child will be able to complete their GCSE studies at the same school. Parents of children in Year 10 have been advised that there is a risk to applying for a 6th form place at Raine's and that they may consider an alternative school for September 2020, given that the proposal under consultation is for Raine's to close at the end their child's Year 11. However, parents are free to choose to apply to Raine's.

The LA has a duty to manage maintained schools responsibly and to be transparent with parents about the possibility that their child's education could be impacted if Raine's were to close.

The public consultation detailed the support that the LA has provided to Raine's in efforts to increase the School's pupil intake over a number of years. Nevertheless, the Raine's School leadership (including governors and the Raine's Foundation Trust) during this period had primary responsibility for publicising and promoting the School, alongside support provided by the LA.

- vi. Suitability of Oaklands as an alternative for current Raine's students - Objections were raised about the standards of student behaviour at Oaklands, with several people referring to violent and aggressive behaviour towards Raine's students on a recent visit. Others objected to Oaklands being a community, rather than a faith, school.

LA Response: The LA and the leadership of both Oaklands and Raine's are aware of the different demographics of the two school communities. The schools and the LA are united and absolutely clear that the underlying principles in any potential joint venture or activity moving forward should be tolerance, respect and cooperation in line with 'British Standards and Values'. An organisation called a 'New Direction' which has worked in Tower Hamlets Schools previously is developing a programme of activities for pupils to help build relationships between the two schools. Raine's and Oaklands Schools have set up a joint steering group to oversee the progress and arrange for any further transition support if required.

- vii. The methodology for projecting future student numbers was flawed. - Only first preference numbers were used. This is different from likely student

admissions due to allocation of second or subsequent preferences for some students; no account was taken of new house building near the school.

LA Response: The projected future pupil numbers takes account of the history of all preferences made for Raine’s School. However, the number of first preferences is a critical factor as generally only a relatively small proportion of 2nd and lower preference applicants end up taking up places. This is because the vast majority will receive offers at higher preference schools, as evidenced by the outcomes for the latest (2019) round of Year 7 admissions to Raine’s, set out in the table below:

Preference	Applications	No. withdrawn due to offer at a higher preference school	Offers/acceptances
1st	29	N/A	28*
2nd	23	16	6*
3rd	35	33	1*
4th	17	17	0
5th	13	12	1
6th	16	15	0*
Total	133	93	36

* This figure accounts for an applicant who withdrew immediately following receipt of offer

The number of applicants for Year 7 entry to Raine’s School has consistently fallen, from 425 in 2011 to 133 in 2019; despite demand for secondary school places in Tower Hamlets rising over the same period (see para. 9.5 below). All relevant housing developments have been appropriately taken into account in the projections of required future pupil places undertaken by the LA to inform its planning responsibilities.

- viii. The financial history of the school has been misrepresented - Lack of financial viability of the school was claimed as a main reason for the proposed closure, yet evidence to support this has either not been made available, or when accounts have been inspected some respondents have reached a different conclusion.

LA Response: A significant element of a school’s funding comes from its pupil numbers. Thus, having far fewer pupils than the school’s capacity puts the School’s financial viability in very grave doubt. Raine’s School has run a deficit since 2016. The deficit was £487,000 for the 2018/19 financial year. On the basis of projected pupil numbers, this deficit is forecast to increase significantly year on year. Additionally, in May 2017 the School had to apply for a licensed deficit from the Council of £1m, whereby the Council loaned the same to the School. This required a staff restructuring to reduce costs by £900,000. The viability of the repayment of the loan whilst meeting running costs of the School was premised on a model of a minimum intake of 110-120 pupils in each year 7, over a 5-year period. This has not been realised. The forecast also indicates that it will not be realised in the future.

- ix. The strength of Raine’s 6th Form has been ignored or underplayed - The Raine’s 6th Form is “Good” according to Ofsted, and in 2018 was oversubscribed, yet this strength in the school is ignored in the consultation report, and in the student intake and financial projections.

LA Response: Pupil numbers in the 6th Form have fallen such that the range of subjects offered is restricted. For the incoming 2019 year there are 132 pupils. This compares very unfavourably against the Department for Education’s recommended minimum size for a viable 6th Form of 200. Although no

assumption is made that a school should be of a certain size to be a good school, its viability and cost-effectiveness are important factors for consideration.

- x. Raine's Foundation Trust representatives have been unfairly or unlawfully excluded from the management of the school - no Foundation representative was invited to join the IEB in 2018.

LA Response: The Interim Executive Board (IEB), responsible for the management of Raine's, was established in conjunction with the Regional Schools Commissioner and with the permission of the Secretary of State for Education. Members of the IEB have to be approved by the Secretary of State. The LA had asked the Raine's Foundation Trust to nominate a Trustee to join the IEB; however the nomination provided was rejected by the Secretary of State. The letter from the Regional Schools Commissioner rejecting the nomination was forwarded to the Foundation Trust. There were no further nominations received from the Trust.

- xi. The allegation that the motive is to acquire the Raine's School land and buildings and/or to sell them off for development. Some respondents have speculated that the true motive for closing the school is to sell the buildings for residential development; others have pointed out that Raine's School Foundation has an interest in the land and buildings

LA Response: The council has no financial interest in the Raine's main building at Approach Road, E2 and has limited financial interest in the site of the former Raine's Lower School at Old Bethnal Green Road, E2. Any proceeds received by the council from the sale of this site would be reinvested into the schools' capital programme.

- xii. There is a clear conflict of interest for the Oaklands headteacher who may not fairly judge the best interests of Raine's School. The supporters of Raine's School do not believe that the senior staff from Oaklands can fairly judge the best interests of Raine's school; there are (unsubstantiated) allegations that the Oaklands Head Teacher has a pecuniary interest in the proposals.

LA Response: A Joint Steering Group with representatives from the governing bodies, staff, and parents of both Raine's and Oaklands Schools has been set up to oversee the transition arrangements. The Steering Group has an Independent Chair and the key objective in its 'terms of reference' is to ensure that there is a clear focus on the best interests of children at **both** schools.

- xiii. No account has been taken of air quality impact on school students. Some respondents say that air quality at Raine's is superior to other locations in the Borough, and that its location adjacent to Victoria Park should be significant factors for the future of children's education.

LA Response: The air quality at Raine's and its environmental surroundings is certainly better than other secondary school locations around the borough. Unfortunately this is not something that the School has been able to successfully exploit when seeking to attract pupils. It is also not something that the LA could reasonably consider as a basis to keep the School running, given its underlying viability issues.

- xiv. Why close a secondary school at the same time as expanding one and opening two schools in other parts of the borough - Respondents have challenged

the relationship between overall demand for secondary places and demand for places at Raine’s School. They suggest that falling demand for places at Raine’s might be typical of the whole Borough. Those that concede that there might be a differential demand then go on to argue that it might be better for the public purse to invest in improving Raine’s than to close it and invest in expanded or new provision elsewhere.

LA Response: The decline in the pupil roll at Raine’s is not typical of the schools across the borough. During the period of decline in the numbers of pupils at Raine’s there has, in fact, been an increase in the numbers of children transferring from primary to secondary school at Year 7. See table below:

School Year	Year 7 Pupil Cohort
2011	2569
2012	2477
2013	2602
2014	2749
2015	2829
2016	2738
2017	2878
2018	2995
2019	3069

All of the other Tower Hamlets schools maintained by the LA have been judged by Ofsted to be either ‘good’ or ‘outstanding’ and most have seen a steady performance in their number of applications and in their rolls for Year 7 entry.

The plans for the LA to increase its secondary school capacity are not just concerned with the overall number of places. It is also about their distribution and whether it ensures that schools will have a viable number of children to ensure a good quality of education.

The LA when making decisions on school organisation, must have regard to key factors, mainly:

- Contribution to local diversity that meets the aspirations of parents and helps to raise standards;
- Presumption in favour of expansion of popular and successful schools. (The LA in these cases will need to consider parallel action to remove the surplus capacity created by unpopular schools);
- Sustainability of provision;
- Availability of funding and land.

The plan to develop a new school at London Dock, E1W is to provide additional provision, but also to provide better access to secondary school places for children in the Wapping Area. The plan to develop the site for a school at Westferry Printworks, E14, is to provide improved accommodation for an existing school on the Isle of Dogs.

Raine’s School is not able to address these capacity and other requirements because the School is in the wrong location, has long since been underperforming and it is evident that it is no longer a popular choice for families in Tower Hamlets.

Question 6 - Do you have any comments about the proposed expansion of Oaklands School?

There are 5 main themes to the responses, summarised below:

- i. Oaklands serves a different community group and integrating the Raine's students will be challenging
- ii. Oaklands is not a CofE school, and so not a suitable replacement capacity.
- iii. the Oaklands site is constrained and unsuitable for further expansion.
- iv. the Oaklands site lacks sports and other outdoor facilities.
- v. the behaviour and conduct of Oaklands students has been observed to be violent and aggressive, and therefore not appropriate to be rewarded with further expansion.

LA Response: In the event that Raine's closes, there is the potential to negotiate to expand Oaklands School by making use of the disused site of the former Raine's Lower School at Old Bethnal Green. This would enable the Oaklands 6th Form and Year 11 to be moved in order to release space on the existing site to provide the additional accommodation that will be required for Raine's students. The Old Bethnal Green Road site would provide additional sports facilities, including an all-weather pitch, changing rooms and fitness suite.

Alternatively, changes can be made to the Oaklands site to facilitate an increase in the planned admission number, or an alternative temporary site identified.

Oaklands is not a faith school, but will provide Religious Education (RE) as part of the curriculum as well as make provision for collective worship. If a decision is made to close Raine's the Diocese will work closely with Oaklands to ensure that the Raine's pupils receive high quality RE and are supported in their spiritual development. Detailed discussions with Oaklands School won't begin unless or until a decision is taken that Raine's is going to close as the Diocese is not pre-judging the outcome of the consultation.

The proposal includes plans for Oaklands School to be expanded to ensure that existing Raine's pupils are able to transfer to an alternative school nearby. However, it is not being presented as the only option. Raine's parents may also apply for places for their children at alternative schools, including nearby faith schools.

Question 7 - Do you have any comments about the proposed merger of Raine's Foundation School with Oaklands School, by closing Raine's Foundation School and expanding Oaklands School?

There are 7 main themes to the responses, some of which repeat themes mentioned above, summarised below

- i. Oaklands is not a CofE school; Sir John Cass would be a better choice of school to expand.
- ii. 300 years of history – concern about the loss of tradition and recognition that it used to be a good school.
- iii. Allegations of violence, bullying and general poor student behaviour at Oaklands.

- iv. Poor communications by Raine's IEB in February 2019, and in general by LBTH and LDBS.
- v. Oaklands serves a different community group and integrating the Raine's students will be challenging.
- vi. I/my son/daughter/grandson will not transfer to Oaklands.
- vii. Proposals assume that Raine's School cannot be improved; suggestion that with more time, investment and effort the decline could be reversed.
- viii. The Raine's site should be kept open.

LA Response: Although the LA did invite Sir John Cass and Redcoat Foundation CofE School to consider expanding as part of an amalgamation/federation with Raine's; the governors of Sir John Cass Foundation declined to explore this option.

The LA, through the work of the Joint Steering Group, will continue to ensure a smooth transition of pupils from Raine's to Oaklands, were the proposal to go through. The LA is of the view that this would support local integration and community cohesion objectives. Further details of this are provided in the action plan contained within the Equality Impact Analysis.

All of the other points made in relation to this question have been addressed in the LA responses provided in the earlier sections of this report.

Question 8 - Do you have any alternative suggestions to the options presented in this consultation?

There are 7 main themes to the responses, summarised below:

- i. installing new governors and new senior leadership and investing in an improvement plan, including increased marketing to prospective parents.
- ii. managing it as a smaller school.
- iii. converting it to an academy.
- iv. converting it to a private school.
- v. closing Oaklands and expanding Raine's.
- vi. selling some of the Raine's school land and buildings for re-investment in Raine's.
- vii. retaining the "Raine" name for the future.

LA Response: In relation to the alternative options of academisation, amalgamation, reducing the planned admission number, and expanding Raine's School, a summary of how these options were initially considered and later assessed as not suitable are set out in Appendix 5.

The ownership of the buildings and land of Raine's School is shared between the Raine's Foundation Charitable Trust and Diocese. The sale of part of the Raine's School land and buildings would therefore be a matter for consideration by the Trust and Diocese. In any event the sale of capital assets could not offer a permanent solution to the school's increasing structural budget deficit.

The remaining points made in relation to this question have been addressed in the LA responses provided in the earlier sections of this report, which should be read as a whole.

9. UNDERLYING VIABILITY ISSUES

- 9.1 The LA is proposing the closure of Raine's school because it no longer believes the school is sustainable due to the detailed reasons presented in the public consultation document. However, it is evident from the responses to the public consultation that this view is not held by the majority of respondents. The respondents held a range of views, which are outlined in para 8.6 above and presented in detail in Appendix 5. A recurring theme in the consultation responses was that the school's performance could be turned around with strong leadership and that the positive comments made during the recent Ofsted monitoring visit was evidence of significant improvement. Respondents argued that the school should be given more time for another Ofsted inspection which could result in the school being placed in a 'Good' category. Respondents considered that this would result in more parents choosing to send their children to Raine's and improve its financial position. Some respondents also took the view that the school's financial position had been misrepresented.
- 9.2. The LA does not agree with these views because of what it considers to be key underlying viability issues for Raine's School, relating to its very low pupil numbers, admission patterns and substantial budget deficit. This is further exacerbated by the School having been in the Ofsted Category of requiring improvement since November 2015 and its consistently poor exam results. This trend in its exam results was first identified by the DfE in a letter to the then Chair of Governors on 10th January 2014, turning down the school's application to become an academy because standards were below national averages.
- 9.3 On the national GCSE benchmark of the percentage of pupils achieving grade 5/C or above in English and maths, Raine's average student score was significantly below both the Tower Hamlets and national averages in 2015/16 (Raine's average of 35% in comparison with TH average of 63%), 2016/17 (Raine's average 30% in comparison with TH average of 44%) and in 2017/18 (Raine's average of 22% in comparison with TH average of 44.8%).
- 9.4 Raine's has long since ceased to be a popular choice amongst parents in the borough. It is also evident, from the children moving to secondary school from Church of England (CofE) Primary Schools in Tower Hamlets and surrounding areas, that Raine's is no longer the school of choice for the majority of families with a Christian faith. The proportion of children that applied from CofE primary schools to Raine's substantially reduced over the past eight years as shown in the table below:

Year	No. of Children transferring from C of E Primary Schools	No. applying to Raine's	% applying to Raine's
2012	239	77	32.2%
2013	254	67	26.3%
2014	256	60	23.4%
2015	318*	71	22.3%
2016	264	60	22.7%
2017	261	48	18.3%
2018	250	49	19.6%
2019	269	40	14.8%

* Cohort increase due to reception blip class at St Luke's CE Primary in 2009

- 9.5. Admission patterns also show that over an eight year period from 2012 to 2019 when the numbers of applications for Year 7 entry to secondary schools in the Tower Hamlets area has increased from 2569 to 3069, Raine's has never been full. The highest pupil roll during this period was as 808 in 2012, against a capacity of 1050. Please see chart below:

Pupil Roll (Jan census)	Roll	Capacity	% Surplus
2012	808	1050	23%
2013	762	1050	27%
2014	747	1050	29%
2015	703	1050	33%
2016	669	1050	36%
2017	559	1050	47%
2018	562	1050	47%
2019	520	1050	51%

- 9.6 Number of applications for Year 7 entry to Raine's

Year	1st Pref	2nd Pref	3rd Pref	4th Pref	5th Pref	6th Pref	Total
2011	96	106	107	46	34	36	425
2012	71	94	90	56	22	37	370
2013	63	61	72	46	37	28	307
2014	65	85	74	57	33	36	350
2015	62	64	62	44	24	22	278
2016	57	55	57	28	36	23	256
2017	62	54	37	37	30	13	233
2018	49	65	40	26	25	11	216
2019	29	23	35	17	13	16	133

- 9.7 It should be noted that in December 2015 the LA's Corporate Director for Children's Services, with the support of the Regional Schools Commissioner, wrote to the then Chair of Governors highlighting concern about the substantial decline in Raine's pupil numbers and that the School was in serious financial difficulty. The Corporate Director's letter highlighted concerns raised by the November 2015 Ofsted inspection - identifying a need for a review of the governing body, given its ineffectiveness and inability to present a clear vision for the school's future and determine effective school policies. The Ofsted report welcomed the steps that the headteacher was taking for the school to establish an 'open' admissions policy, encouraging applications from all world faiths. It was felt that this would help to attract applications from the wider community. Although, it was accepted previously by the governing body that the church expectations within the admissions policy was a key factor in the decline in applications to the School, the LA identified the actions of the Chair in obstructing the headteacher from making this change as a key area of concern.

- 9.8 The table below shows the numbers on roll in at the end of the last academic year (2018/19) and the numbers at October 2019, based on the number of in-year requests from parents taking action of their own volition to transfer their children to alternative schools:

Year Group (2018/19)	Roll as at 23 July 2019	In-Year Transfer requests	In-Year Transfer Offers	Year Group (2019/20)	Roll at Oct 2019
7	61	21	11	7	0
8	89	36	22	8	46

9	64	57	48	9	60
10	85	3	3	10	0
11	73	0	0	11	75
12	77	N/A	N/A	12	0
13	58	N/A	N/A	13	42
Total	507	117	84	Total	223

*

9.9 In terms of demographic growth, pupil projections show that there is no material increase in the projected numbers of pupils within Bethnal Green. Based upon actual primary data in the relevant planning area/s numbers of pupils moving from primary schools in Bethnal Green will remain, at the very best, static.

9.10 The current pupil projections for the LA are attached as Appendix 9. This includes the planned secondary school capacity through to 2028.

9.11 An analysis of the current financial position of Raine's School is provided as Appendix 10 to this report. It should be noted that current Education and Skills Funding Agency guidance states that any deficit balance on a closing school is the responsibility of the LA.

10. EQUALITIES IMPLICATIONS

10.1 An Equalities Impact Assessment has been conducted by the LA and is attached at Appendix 11. This must be considered in detail when the Cabinet considers the matters above, as part of its decision on whether to publish the statutory notice and proposal to close Raine's and the same in relation to expanding Oaklands.

10.2 The Equality Act 2010 requires the LA, when exercising its functions, to have due regard to eliminate discrimination, harassment, victimisation; advance equality of opportunity; and to foster good relations between persons who share a relevant protected characteristic and those who do not ("the Public Sector Equality Duty").

10.3 The proposed representation period will involve a broad range of stakeholders and a thorough updated Equalities Impact Assessment ("EIA") will be undertaken in relation to the proposal to close Raine's. All representations, the EIA, and all matters relevant to the Public Sector Equality Duty will be meaningfully considered prior to any final decision on closure of the school.

10.4 This will also ensure that equality and diversity issues are represented and considered to ensure the fair and equal treatment of current and potential pupils and staff in both Raine's and Oaklands schools and the LA's area.

11. COMMENTS OF THE CHIEF FINANCIAL OFFICER

11.1 Appendix 10 gives an analysis of Raine's school's financial history and its continuing difficulty in setting a balanced budget. As the analysis shows, the school has not demonstrated that it can achieve a balanced annual budget in the foreseeable future nor reduce its accumulated deficit of £0.91m as at 31 March 2019. Its continuation would therefore require additional support, estimated by the school as £0.21m in 2019-20 and increasing thereafter, with no foreseeable prospect of repayment. As this is not a sustainable position the CFO supports proceeding to the next stage of the statutory consultation.

- 11.2 If the decision is taken to close the school the deficit and the associated costs of closure will be a charge to the General Fund. The deficit will grow the longer the school continues without a balanced budget.
- 11.3 In the event that closure is agreed negotiation can proceed on the expansion of Oaklands School. The cost of any purchase will be subject to negotiation as will any interim rental costs. In this event resources will need to be identified from the funding options outlined in Appendix 4 to the cabinet report on Pupil Place Planning.

12. COMMENTS OF LEGAL SERVICES

- 12.1. Under section 15 of the Education and Inspections Act 2006 (“the 2006 Act”), a Local Authority can propose the closure of all categories of maintained school. The LA must follow a statutory process to close a foundation school. The statutory process is set out in Part 4 of the 2006 Act. It is a detailed process that will require the publication of statutory proposals for the school’s closure. As well as the provisions in the 2006 Act, the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 must be followed and the LA must have regard to the statutory guidance – Opening and closing maintained schools (“the Guidance”)
- 12.2. The reasons for closing a maintained school include, but are not limited to, where the school is no longer considered viable, or there is no predicted demand for the school in the medium or long term, or it is to be “amalgamated” with another school. The report sets out relevant reasons.
- 12.3. The Guidance additionally sets out that where a school that has been designated with a religious character, decision-makers should consider the effect that any proposal for closure will have on the balance of denominational provision in the area, as well as the number of pupils currently on roll, the medium and long term need for places in the area, and whether standards at the school have been persistently low.
- 12.4. The power of the governing body of a voluntary or foundation school to publish proposals to close its own school does not extend to an Interim Executive Board (IEB).
- 12.5. The report recommends that following the pre-publication consultation which has been carried out, a decision is taken to publish a statutory notice and proposal (‘statutory publication’) for the closure of Raine’s Foundation Trust School. The pre-publication consultation has been carried out at a formative stage, when responses can be taken into account in the development or taking forward of the proposals and before taking the decision about whether to publish the statutory notice. Cabinet must take the outcome of the consultation conscientiously into account in taking a decision about whether to progress to statutory publication.
- 12.6. If a decision is taken to publish the statutory notice, the statutory representation period runs for 4 weeks from the date of publication. The draft notice at Appendix 1 complies with the statutory requirements. The statutory proposal should be published within 12 months of the initial consultation.

- 12.7. The LA can publish a proposal to close one school (Raine's) and enlarge or transfer site (following the statutory process) of an existing school (Oaklands) to accommodate displaced pupils. The report includes consideration of proposals to expand Oaklands School to make available places for the pupils by the potential closure of Raine's Foundation. The expansion is supported in principle by the Governing Body of Oaklands School, Raine's Foundation IEB and the Anglican Diocese. However, the details of how Oaklands could be expanded are still under review as this may be negotiated through a move to the Raine's lower site (which is currently vacant), by making changes to Oaklands' existing site, or seeking an alternative temporary site. The legal procedure for this proposed expansion will depend on which pathway is planned, and will therefore be dealt with separately in due course.

Employment considerations

- 12.8. The proposal for closure of the school may lead to the staff being made redundant. A dismissal for redundancy purposes is defined in section 139 of the Employment Rights Act 1996 and includes circumstances where an employee is dismissed for reasons wholly or mainly attributable to the fact that the employer has ceased or intends to cease to carry out the business for the purposes of which the employee was employed. By section 135 of the Employment Rights Act 1996 an employee is entitled to a redundancy payment if the employer dismisses the employee by reason of redundancy. Separate consultation with staff regarding any school closure, redundancy situation or amalgamation will be required, if the proposals are taken forward. The school should follow its redundancy and redeployment process (or any adopted diocese or LA process if none is in place).
- 12.9. The impact of TUPE provisions may need to be considered later depending upon the final proposals including decisions about amalgamation.

Equality considerations

- 12.10. When deciding whether or not to proceed with these decisions the Council must also have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristics and those who do not (the public sector equality duty).
- 12.11. In light of Raine's Foundation School's designation as a Church of England school, the equality impact assessment has had particular regard to the impact on the religious needs of the affected children, parents and staff and balance of denominational provision in the area. It is essential that the Cabinet considers the appended Equalities Impact Analysis in detail before taking a decision in respect of proceeding with publication of a statutory notice.

13. ONE TOWER HAMLETS CONSIDERATIONS

- 13.1 The LA has to plan for the overall social infrastructure to meet the needs of its local population. This informs the development of the council's asset management and service planning to ensure that the necessary infrastructure is in place and that any competing issues are properly balanced.

14. BEST VALUE (BV) IMPLICATIONS

14.1 This report confirms serious concerns about the future financial viability of Raine's School, given that the school budget is based upon pupil numbers, which have reached a critical stage of decline. No decision as to the future of the Raine's School site has been made and this cannot be properly considered until the outcome of the consultation process on the school's future has been determined and a decision finalised.

15. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

15.1 There is no sustainability or environmental implications arising out of this report. Any environmental and sustainability implications arising from the representation period will be duly considered.

16. RISK IMPLICATIONS

16.1 If authorised, continuation of the process will be carefully managed and evaluated in line with statutory guidance and taking account the views of consultees in order to minimise and mitigate risks.

16.2 As can be seen from the table in paragraph 9.6 above, the future viability of Raine's has been further debilitated by the number of requests from parents to move their children to Oaklands or alternative schools now, rather than wait to move in a managed cohort in September 2020, as described in the implementation plan in paragraph 6.1. Despite the LA writing to all parents to explain the option for their children to remain at Raine's until the time came for their whole year group to move, this risk was always present from the point that the consultation on the School's closure commenced. It will be important to ensure an effective transition of pupils to minimise any impact. The Council is working with Raine's, Oaklands and the other schools to support them in mitigating this risk.

16.3 Any delay to a decision on the future of Raine's is likely to further exacerbate the impact on the school, its pupils and staff. The continuing decline in pupil numbers leads to greater financial challenges adversely affecting its staffing and the School's ability to deliver a full and balanced curriculum. The timetable and transition arrangements set out at Stage 5 in paragraph 6.1 is proposed to mitigate this risk.

17. CRIME AND DISORDER REDUCTION IMPLICATIONS

17.1 There are no specific implications arising.

18. SAFEGUARDING IMPLICATIONS

18.1 The report deals with the Council's approach to providing school places for the local population. The supply of school places contributes to the safeguarding of children by ensuring their early access to 'good quality' and sustainable education provision.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

Background Documents – Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012

- Appendix 1 Draft Statutory Notice
- Appendix 2 Public consultation paper, further information and response form
- Appendix 3 Letter from Department of Education
- Appendix 4 Ofsted inspection reports from November 2015 and October 2017
- Appendix 5 Report on alternative options to the closure of Raine’s School
- Appendix 6 Notes from the public meetings on the consultation proposals
- Appendix 7 Analysis of the consultation responses
- Appendix 8 Copies of all responses to the public consultation
(https://www.towerhamlets.gov.uk/ignl/council_and_democracy/consultations/Proposal-to-close-Raines-Foundation-School.aspx)

- Appendix 9 LA Pupil Projections 2018-2028
- Appendix 10 Summary analysis on the current financial position of Raine’s School
- Appendix 11 Equalities Impact Assessment
- Appendix 12 Exempt papers: Witness statements and skeleton arguments from judicial review proceedings

Officer contact details for documents: N/A

This page is intentionally left blank

Appendix 1

Statutory Proposal to close Raine's CofE Foundation School

1. Contact details

Name and address of Local Authority publishing the proposal:

Tower Hamlets Council, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

Name, address and category of school proposed to be discontinued:

Raines Foundation School, Approach Rd, Bethnal Green, London, E2 9LY

2. Implementation

Date on which it is proposed to close the school: 31 August 2020

It is proposed to implement the closure as follows:

- No year 7 for 2020 (Parents wishing to express a preference for this year have been informed of the plans for closure in 2020 before the Autumn term secondary transfer admissions round in 2019).
- Years 8, 9, 10, 11 allocated to Oaklands School for September 2020. Parents can apply for their children to attend alternative schools.
- Year 12 will continue their Year 13 exams study at Oaklands School.

3. Reason for closure

The proposal arises due to a fall in pupil numbers and the associated impact on the educational and financial viability of the school. The School is being recommended for closure due to underlying sustainability issues relating to its considerable and unrecoverable cumulative budget deficit at 1 April 2019 of £0.91m, very low pupil numbers, and admission patterns that has seen a substantial decline in applications over the previous eight-year period:

Raine's	1st Pref	2nd Pref	3rd Pref	4th Pref	5th Pref	6th Pref	Total	PAN	Offers*
2011	96	106	107	46	34	36	425	150	150
2012	71	94	90	56	22	37	370	150	114
2013	63	61	72	46	37	28	307	150	102
2014	65	85	74	57	33	36	350	150	95
2015	62	64	62	44	24	22	278	150	89
2016	57	55	57	28	36	23	256	150	88
2017	62	54	37	37	30	13	233	150	91
2018	49	65	40	26	25	11	216	150	72
2019	29	23	35	17	13	16	133	150	36

PAN = Planned Admissions Number

*Offers made to Raine's applicants on National Offer Day (1st March)

NB. Not all applicants would be offered a place at Raine's as the majority secured a place at a higher preference School

The School's position is further exacerbated by it being in Ofsted category of 'Requiring Improvement' since November 2015 with below standard GCSE results.

A seven-week period of public consultation, including meetings with staff, governors, and parents, along with other interested parties has been undertaken from 10th June to 31st July 2019 in relation to whether the Council should publish this notice and proposal to close Raine's School and move students to Oaklands School from the 2020/21 academic year. The consultation documents and responses can be viewed [here](#).

4. Pupil numbers and admissions

The numbers for whom provision is currently made at the school:

The school is a co-educational mainstream community school for pupils aged 11 to 19. The school has a Published Admission Number (PAN) of 150 for each year group, giving a total of 1050 places. As at 22 October 2019 the school has 223 pupils on roll.

5. Displaced pupils

There are currently 223 pupils on roll: 0 in Year 7, 46 in Year 8, 60 in Year 9, 0 in Year 10, 75 in Year 11, 0 in Year 12 and 42 in Year 13 (October 2019).

This proposal is being considered alongside a parallel proposal, to expand Oaklands School. It is considered that the proposals are interrelated, and therefore the plan is for provision to be made to accommodate all displaced pupils at Oaklands School, Old Bethnal Green Road, London, E2 6PR (under that parallel proposal). During the informal consultation it was indicated that some families have preferences for other local schools and/or may live closer to other schools. Some schools in the surrounding areas have vacancies in some year groups and the Local Authority will endeavour to meet parental preferences for school places, where possible.

The local authority will continue to monitor the projected need for future school places and propose changes, if required, to ensure sufficient places are available in its area. However, given the parallel proposal and plan to use an expanded Oaklands for displaced pupils, it is not anticipated that the closure of Raine's will cause a shortage of secondary school places elsewhere in the local authority's area for secondary school places if that proposal were to be approved.

Where pupils do not wish to take up a place at Oaklands, they also have the option of applying for other schools in the local authority's area. The Council will support those applications, where students meet the admissions criteria and there is sufficient space at the relevant school. The same applies to the Urswick School in Hackney, at which the local authority and Diocese have agreed there will be priority places given to displaced pupils from Raine's should the proposals pass. Urswick School is geographically nearby to Raine's and therefore a potential option for some pupils to attend.

6. Impact on the community

Raine's School does not directly provide community access to its facilities.

The building at Approach Road, E2 is currently rented to an external organisation to run community sports activities outside of school hours. This organisation will be provided with the opportunity to continue to run its provision out of a nearby alternative school with similar sports facilities.

There may be an impact on the community, as the particular composition of students attending Raine's, and their parents and guardians, will no longer exist at the school. However, these students and their parents have the opportunity to continue to socialise as a community through secondary educational provision at Oaklands School.

Parental choice will be comparatively diminished by the removal of Raine's as an option to send children to. However, insofar as parents are concerned to obtain Christian or CofE educational provision for their children, there remain options within both Tower Hamlets (Sir John Cass, Bishop Challoner, and Canary Wharf – on which please see section 8 below) and in Hackney (Urswick School). Sir John Cass is a very popular school and therefore children from Raine's are unlikely to obtain a place there. However, there is greater space available at the other schools.

7. Rural Primary Schools

Not applicable.

8. Balance of denominational provision

The local authority is under an obligation to consider the impact on the balance of denominational provision in the area before it determines the outcome of school closure proposals. Raine's is a CofE school. Were Raine's to close then a CofE secondary school option would continue to be available in Tower Hamlets at Sir John Cass Foundation. It is noted that this is a popular school and is often oversubscribed therefore is not an option for all Raine's current pupils. There are however other faith school places accessible in Tower Hamlets at Bishop Challoner and Canary Wharf secondary schools.

Oaklands is a non-denominational School. However, were the proposal to be passed then steps would be taken to ensure that former Raine's pupils who wished to practice their religion could secure chapel time at the school.

As there is another CofE secondary school as well as other faith schools in Tower Hamlets and surrounding areas, the proposed closure will have minimal impact on the balance of denominational school provision in the local authority's area.

There has been a significant decline in the number of applications for children from CofE primary schools to Raine's over recent years and this mirrors the decline in the borough's Christian population as evidenced by the last national census, where Tower Hamlets had the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent.

Raine's has a Planned Admission Number of 1050, but had 526 students on its roll when the original consultation was conducted to consider issuing this statutory notice. It is currently operating with 223 students on its roll.

9. Maintained nursery schools

Not applicable.

10. Sixth form provision

Pupils currently in Year 11 will have the option to continue their 6th form studies at Oaklands or transfer to other 6th form provisions and this will be co-ordinated with support from the staff at Raine's School and the LA.

There is a greater provision of educational opportunities at Oaklands because of its size and viable funding model.

11. Special Educational Needs provision

Raine's School does not provide educational provision recognised by the local authority as being reserved for children with special educational needs. There are 43 pupils on roll who have been identified as having special educational needs, of which there are 5 pupils with an Education Health and Care Plan.

At Oaklands there is a dedicated Special Educational Needs department that assists students with a range of educational requirements. The proposal is therefore expected to improve special SEN provision.

12. Travel

Distance for home to school travel for the 223 pupils in Years 7, 8, 9, 11 and 13 currently attending the Raine's ranges from 0.07 to 13.7 miles.

The table below gives the travel distances for these same pupils to Oaklands School.

Travel to Oaklands School	Number of pupils	% of pupils
Up to $\frac{1}{2}$ mile	9	4%
Between $\frac{1}{2}$ -1 mile	43	20%
Between 1-2 miles	94	42%
Between 2-3 miles	48	22%
More than 3 miles	29	13%
Total pupils	223	100%

It is recognised that these displaced pupils will need to make new journeys to school and may need to travel slightly further to Oaklands. However, in the majority of cases the journey to the new school will be less than 2 miles.

Eligibility for support with home to school transport will be determined in line with the local authority's home to school transport policy, which can be accessed via this link: [School Travel Support](#).

Increased car use (compared to that for Raine's) is unlikely under the proposal (and parallel proposal to expand Oaklands) due to the distance to Oaklands being walkable for similar proportions of (and most) students. Where that is not the case, there are bus routes and support under the school transport policy set out above which would prevent individual families from needing to use cars. The distance between the Raine's and Oaklands school sites is 0.6 miles. Therefore, the difference under the proposal is negligible.

13. Procedure for making representations (objections and comments)

Within four weeks from the date of publication of this proposal any person may object to or make comments on the proposal by:

Email: school.organisation@towerhamlets.gov.uk

Post: School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children's Services
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

Closing date for responses is 2nd December 2019 at 5pm.

We will not be able to consider any responses received after this date. All responses received during the representation period will be published on the Council's website in mid-January 2019. The website address is: www.towerhamlets.gov.uk/rainesfoundationschool.

DRAFT

This page is intentionally left blank

Review Findings : Oaklands-Raine's

1st April 2019

Report prepared by Alasdair McDonald and Jan Woodhead

NB Throughout this report, the use of the term 'Oaklands Site' can be assumed to refer to the current Oaklands site, the use of the term 'Raines Site' to the current Raines Lower School site and the use of the term 'Approach Road Site' to the current Raines main site.

1 Introduction

- 1.1 In early 2019, a decision having been taken - for both educational and financial reasons - to assess the future sustainability of Raine's Foundation School, the LA initiated a detailed exploration of the potential impact and implications of closure.
- 1.2 As part of this – it having been established that Anglican Diocesan officers were open to the idea of making the currently unoccupied Raine's Lower School site available for use by another school – the LA also began exploring the possibility of transferring the school places to nearby Oaklands.
- 1.3 In view of this, further planned improvements to the Raine's site were put temporarily on hold, pending receipt of the findings included in this review - as carried out at the request of the LA by two experienced former headteachers, who were asked to report back as appropriate under the following headings :
- The proposed size and organisation of the new school
 - Premises site and accommodation requirements
 - Proposed governance and leadership structure
 - Educational vision, aims and ethos
 - Curriculum delivery model
 - SEN
 - Admission arrangements
 - Finance
 - Staffing model
 - Parent and pupil engagement
 - Proposed sequencing and timescale of the two linked projects
 - Overall conclusions
- 1.4 The two consultants subsequently met with relevant stakeholders, reviewed accommodation at both sites and carried out appropriate benchmarking with other schools of a similar size and type to the proposed new Oaklands School – findings and recommendations as per the following.
- 1.5 As agreed, the key recommendations have been shared, thoroughly discussed with and broadly welcomed by key senior leaders at Oaklands (HT, DHs, SBM) in advance of final submission of this report.

2 Summary of Recommendations

- 2.1 Key recommendations as follows :
- No pupils to be admitted to either Y7 or Y12 of the Raines School roll in September 2019. See also Appendix D.
 - Pupils holding offers of places in Raine's Y7 for September 2019 - currently less than 30 in total - to be instead offered places with Oaklands, unless preferring to seek places elsewhere.
 - In particular, families still indicating a strong preference for places for their children in an Anglican school to be provided with priority support – from the LA or Diocese as appropriate.
 - Approach Road to remain open to Raine's pupils due to enter Years 8-11 and Y13 in September 2019 through the academic year 2019-2020 **only**.
 - Raines School to formally close on 31st August 2020, with all Raine's pupils about to enter Years 9-11 transferring to the Oaklands roll - unless preferring to seek places elsewhere – releasing Approach Road to other uses.
 - Longer-term – ie from August 2020 - Oaklands Site to house Years 7-10, Raine's Site to house Years 11-13 plus **all** PE teaching to be delivered at Raine's Site.

- However, September 2019, Oaklands post-16 provision **only** to be moved to Raine's Site – thereby ensuring release of sufficient teaching space at Oaklands to support enrolment of up to 3FE of new Y7 pupils, if needed.
 - In relation to which, Accommodation Plans for both sites – Raine's and Oaklands – to be prepared by the LA, with the Raine's site as first priority.
 - Work to be carried out to Raine's Site March-August 2019 as follows :
 - Further refurbishment of the ground floor areas – as a minimum sufficient to provide :
 - Additional classrooms spaces beyond those already available on the upper floors
 - An adequate reception area
 - Acceptable dining arrangements
 - Remainder of the Raine's Site to be separated off as a construction site, enabling construction of sports hall, MUGA etc plus further refurbishment/building as agreed. (See also Appendix B.)
 - Oaklands PAN for all Years 7-11 to be increased to minimum 180 (6FE) but preferably 210 (7FE) from September 2019. See also Appendix A.
- 2.2 See following detailed findings/recommendations in response to headings set out in 1.3 above.

3 Proposed Pupil Capacity/PAN

- 3.1 Regarding the final size of the new Oaklands, with respect to Years 7-11, the recommendation is that the new school should preferably be 7FE - thereby securing one for one replacement of the 3FE which have consistently been assigned to Raine's over recent years – but, if not, minimum 6FE.
- 3.2 With respect to target numbers for post-16 pupils, the recommendation is that – with the new facilities not yet up and running and the expansion programme not yet even commenced – it is too early to say with absolute confidence whether or not the school will be successful in recruiting to its stated target of 300.
- 3.3 However, assuming an increase at pre-16 level, even only to 6FE, it seems not unreasonable to estimate that – assuming full take up of pre-16 places – post-16 numbers will increase to at least 250.
- 3.4 See also Appendix A.

4 Premises Site and Accommodation Requirements.

- 4.1 Based on conversations with senior staff at Oaklands and detailed consideration of both the current and potential capacity of both sites – in particular taking careful note of the extensive works already carried out at the Raine's Site to transform it into a predominantly post-16 centre – the recommendation is that the Raine's Site should house (a) Years 11-13 and (b) **all** the school's PE facilities.
- 4.2 With respect to the recommendation to consolidate all PE teaching on to the Raine's Site please see also details included in Appendix B.

5 Finance

- 5.1 No specific recommendations to offer in relation to ongoing financial management – which, it is assumed, will continue to operate in line with normal best practice.
- 5.2 However, it is strongly recommended that illustrations are prepared as a matter of urgency, setting out what might reasonably be expected by way of income, should Oaklands expand to (a) 6FE and (b) 7FE – however also clearly indicating potential variations to income if less than full uptake.

6 Staffing Model

- 6.1 No specific recommendations as regards the fine detail of any staffing model – decisions in relation to which will ultimately rest with the Oaklands GB.
- 6.2 However, drawing on benchmarking with appropriately comparable 6FE and 7FE schools, both with 6th Forms, the following indicative FTEs are offered for guidance :

	FTE Teachers (including HT)	FTE Support Staff
6FE + small 6 th Form	71	61
7FE + larger 6 th Form	79	65

- 6.3 See also Appendix C.

7 Sequencing and Timescale : Recommendations

- 7.1 No further admissions of pupils to any year group at Raine's not already operational – ie no admissions at all to either Y7 or Y12 for September 2019. See also Appendix D.
- 7.2 Raines pupils currently in any of Years 7-10 or Y12 to continue to be educated on site at Approach Road through 2019-2020.
- 7.3 Thereafter, Raine's School to formally close on 31 August 2020 – with any pupils, who by then will be about to enter Years 9-11, being guaranteed places at new Oaklands, unless preferring to take up places elsewhere.
- 7.4 Additionally, it is very strongly recommended that the LA also takes steps to engage the involvement and support of other headteachers and governors in relation to ensuring :
- Full understanding of the educational and financial importance of as many Raine's pupils as possible transferring to the Oaklands roll - specifically no aggressive marketing by schools potentially wishing to expand their own rolls, as consistent with expectations already set out in the agreed LA policy.
 - Sympathetic response to requests for places for Raine's pupils whose families are specifically requesting **not** to transfer to Oaklands, for whatever reason.
- 7.5 If at all practicable, Oaklands post-16 provision to be relocated to the Raines site for September 2019 – ie moved across to occupy all those areas of the site that have already been fully refurbished **and** such parts of the ground floor as can be readied for use for September 2019 - particularly the ground floor classroom spaces to the East end of the site.
- 7.6 If 7.5 above agreed, work to be carried out between now and end of August 2019 to ensure (a) access for 6th formers to the upper levels of the building by way of a refurbished ground floor section to the east end of the site and (b) separation of the rest of the site as a construction site, enabling safe construction of the sports facilities and refurbishment of the rest of the ground floor to continue through 2019-2020.
- 7.7 Interim catering arrangements also to be devised and actioned to ensure that – as an absolute minimum - 6th form students entitled to FSM can be catered for.
- 7.8 Timescale for remodelling other spaces at the Oaklands Site, as set out in Section 4 earlier, to be over a longer-term period yet to be agreed.
- 7.9 See also Appendix B.

8 TUPE Implications

- 8.1 Subject to careful checking by LA-HR, the recommendation is to proceed as follows, as consistent with agreed LA policy.
- 8.2 All Oaklands staff, both teaching and support, currently holding permanent contracts, to automatically retain their substantive posts – ie no requirement to compete for posts with Raine's staff.
- 8.3 However, in the case of any vacancies subsequently arising – whether through natural turnover over or as a result of overall staff increases, linked to expansion – staff currently holding permanent contracts with Raines to be entitled to first consideration for these posts.
- 8.4 Definition of 'First Consideration' to be as follows :

- Raines staff at risk of redundancy – and also holding permanent contracts - to receive priority notification of any vacancies arising at Oaklands at any time from **April 2019 to August 2020**.
 - Any Raines staff requesting to be considered for a vacancy as above to be considered **before** the post in question goes to open advert.
 - In situations where at least one Raine’s staff member holding a permanent contract is able to demonstrate a sufficiently close match to the person specification for the post, an appointment will be made.
 - In situations where no Raine’s staff member holding a permanent contract is able to demonstrate a sufficiently close match to the person specification, the post will go to open advert.
- 8.5 In the case of vacancies potentially arising as a result of natural turnover, the expectation is that there will normally be a necessity for these to be filled immediately – ie any Raine’s staff wishing to be considered for such posts will have an absolute right to first consideration for such posts.
- 8.6 However, in the case of vacancies resulting from an overall expansion of Oaklands staffing, the likelihood will be that not all of these will be immediately affordable.
- 8.7 The recommendation therefore is for a shadow staffing structure for the new Oaklands to be agreed as a matter of urgency – including the following details :
- Exact number and nature (eg salary grading) of FTE posts expected to be needed, assuming full take up of all available pupil places.
 - Clear timelines indicating by what date each new post is expected to become affordable.

9 Matters to be decided by the Oaklands GB

Educational Vision, Aims and Ethos

- The recommendation is that decisions in relation to these should largely be left to what will be the new Oaklands GB and senior leadership team – however, fully taking account of the fact that it may be that a considerable number of pupils, out of those either currently enrolled or hoping to be enrolled at Raine’s, will transfer over at some point.

Governance and Leadership Structures

- No detailed recommendations to offer in relation to governance, which it is assumed will closely follow the current governance arrangements for Oaklands School – or in relation to leadership structure, which it is assumed will be determined by the new Oaklands GB.
- However, it is advised that the governors should take careful note of the FTE staffing illustrations included in Appendix C.

SEN

- No specific recommendations in relation to this, other than that all statutory requirements must be adhered to - as it is assumed will already be the case for both schools - and that careful consideration is given to the differing composition of the school populations.

Admission Arrangements

- No specific recommendations in relation to this – as a maintained school, it is assumed the current Oaklands admissions arrangements will continue to apply.

Curriculum Delivery Model

- No specific recommendations in relation to this – acknowledging the fact that, ultimately, decisions about a school’s curriculum and mode of delivery rest with the GB.
- However, it is advised that very careful comparison should be carried out - of both the curriculum and the teaching and learning approaches currently in place for Raines – and, where appropriate, taken account of.

Parent and Pupil Engagement

- No specific recommendations to offer in relation to this, other than to advise that all normal good practice in relation to formal consultation procedures be followed - again bearing in mind the differing school populations.

Appendix A New Oaklands PAN : 6FE or 7FE?

A1 Preliminary investigations confirm that the two sites combined – ie Oaklands and Raine’s – potentially have the capacity to be developed to accommodate 7FE + 6th form. For further details, see Appendix B.

A2 Whilst it is noted that there are potential drawbacks to 7FE as opposed to 6FE, it is felt that these are significantly outweighed by the potential advantages.

A3 The recommendation, therefore, is that the new school should preferably admit 7FE across Years 7-11.

Arguments for 7FE

A1 Whilst Raine’s is nominally 5FE, it currently runs year groups of maximum 3FE and has done so for some considerable time, due to low parental demand for Raine’s places. Expanding Oaklands to 7FE will therefore fully replace the operational places currently available at Raines – ie no obvious need for any other school to increase its PAN.

A2 Whilst this will obviously need to be checked with Building Services, initial inspection of the accommodation potentially available across the Oaklands and Raine’s Sites suggests that 7FE can be comfortably accommodated. For fuller details, see also Appendix B.

A3 A 7FE school – assuming good uptake of available places – can, under all normal circumstances, reasonably be expected to be much more financially viable than a 6FE school.

A4 A 7FE school also potentially provides a much more efficient vehicle for delivery of the curriculum. This is because almost all schools see it as educationally desirable to teach classes of less than 30, wherever practicable. What this usually means in practice is 7 teaching groups minimum across year groups of 180 (ie 6FE) and 8 teaching groups minimum across year groups of 210 (ie 7FE). Timetabling an even number of classes generally results in much more cost-effective deployment of staff than timetabling an odd number of classes.

A5 It also needs to be noted that a school developed as described in Appendix B following – ie with a purpose-designed 16-19 centre and state of the art sports facilities available for extensive community use – might well have potential to market itself to both its immediate and the wider community very effectively indeed.

Potential Arguments against 7FE

A6 The most obvious place for additional students for Oaklands to come from – at least initially - is the current and future Raine’s pupils. But it has to be presumed that most parents who have actively chosen Raine’s for their children - or at least been willing to accept a place there, failing their first choice – have done so for one or more reasons linked to the following :

- Faith status of the school – ie CofE
- Small (actual) size of the school – ie 3FE
- Proximity to home
- Friendship group

A7 With respect to faith status, it probably has to be accepted that families - for whom this is a key consideration – will likely opt to look for places elsewhere, at least in the first instance.

A8 With respect to small year group size, again, families for whom this is a prime consideration will likely begin by looking elsewhere. However, it needs to be noted that it is very unusual now to find schools of such small size.

A9 With respect to proximity to home, due to the geographical closeness of Oaklands to both Raines sites – ie very short walking distance from both – it seems unlikely that this will emerge as a major deciding factor for any families considering a transfer from Raine’s to Oaklands.

A10 With respect to friendship groups, whether or not this emerges as a deterrent factor for some families will probably largely depend on how successful or otherwise the Oaklands team is at marketing what the new Oaklands will have to offer.

Appendix B Options for new build/remodelling

B1 The matters dealt with in this appendix are as follows :

- Practicalities of housing 7FE + 6th Form, as opposed to 6FE + 6th Form
- Matters to be considered in relation to Oaklands Site
- Matters to be considered in relation to Raines Site (General)
- Matters to be considered in relation to Raines Site (PE Provision)
- Key Issues to be discussed/agreed with Oaklands HT and GB

Practicalities of housing 7FE

B2 A key recommendation of this report is that Years 11-13 should all relocate to the Raine's Site – together with **all** of PE. This will reduce the overall numbers of pupils currently housed at the Oaklands Site (800) by 320. Adding only 2FE to each of Years 7-10 will take the number of pupils needing to be housed at the Oaklands Site to 720 – ie considerably less than are currently housed.

B3 At the same time, relieving the Oaklands site of the need to maintain dedicated areas for post-16 and PE will release a number of other spaces to general use - thereby further increasing the capacity of the building.

B3 Adding 3FE to the Oaklands PAN – ie increasing to 7FE – will take the number of Y7-10 pupils needing to be housed at the Oaklands Site to 840 – ie slightly more than currently, however with more general use accommodation potentially coming available.

Oaklands Site

B5 Subject obviously to verification by Building Services, it is recommended that the following issues be addressed when agreeing an Accommodation Plan for the Oaklands site :

- Assumption to be that minimum 36 teaching spaces, will be needed at any given time – these to include some use of specialist spaces (eg Technology, Science), however, no PE facilities needed (all relocated to Raine's site).
- One or both indoor PE spaces (sports hall, gym) to be considered for conversion to potentially 4-5 classroom spaces across 2 floors.
- Review of space currently allocated to PE changing to see if feasible to release some/all of this to other uses.
- Review of dining area and adjacent kitchen area – both very small – to see whether these might be improved, whether through expansion or relocation (eg to part of one of the released PE spaces).
- Review of current LRC space – a very large space, which currently frequently has to be timetabled as classroom space – to ascertain whether a better use of this space might be to create a smaller dedicated LRC (ie safeguarded from use as classroom fallback under all normal circumstances) - releasing the remainder of the space for development as full-use general classrooms.

Raines Site (General)

B4 Again subject to verification by Building Services, it is recommended that the Raine's site be further developed as follows :

- Upper floors to be left largely as is – however, with some consideration being given to possibly combining one or more classroom spaces into a larger space capable of accommodating large scale examinations.
- If developing one or more spaces as above, these also to be fitted with sliding partitions to support their division back to normal sized classrooms, when not needed for examinations.
- Review of overall number of large teaching spaces needed to comfortably simultaneously accommodate Year 11-13. (Reasonable assumption = minimum ten Y11 classes, minimum five Y12 classes, minimum five Y13 classes at any given time = minimum 20 classes to be accommodated, including some use of specialist spaces, eg Technology, Science.)
- PE Provision as per the following.

Raines (PE Provision)

B5 Existing planning for the Raine's site already assumes construction of both a large sports hall – presumably with changing - and a sizeable MUGA.

B6 It is a key recommendation of this report that all PE teaching at the new Oaklands should take place at the Raine's site. In practical terms, this will be straight-forward enough to manage, for the following reasons :

- The Oaklands and Raine's sites will be literally minutes apart from each other along the same road. It will therefore be entirely feasible for pupils in Yrs7-10 to be walked down to the other site for one double period per week.
- Oaklands pupils already routinely go off site for some PE lessons.

Matters for Discussion/Agreement with Oaklands HT and GB

B7 It is recommended that the following matters be discussed/agreed asap with the Oaklands HT and GB, to establish a confirmed position, ahead of finalising any accommodation plans :

- Examinations – where will these take place? What implications, if any, will this have for the accommodation plan?
- What additional PE spaces, if any, will the school wish to have access to, beyond what has already been planned for, assuming all PE teaching relocates to the Raine's site - particularly in relation to the practicalities of delivering PE to half-year groups (c100 pupils) when all activities have to be delivered indoors, due to serious bad weather.
- What improvements would the school like to see in relation to dining at the Oaklands site?
- Any other key questions, as identified by Oaklands.

Appendix C Benchmarking Data : 6FE versus 7FE

C1 The details following relate to 2 actual schools - albeit here anonymised for obvious reasons – both well-known to one or both consultants and currently operating on funding levels very similar to what might reasonably be expected in TH.

C2 This data has been included to illustrate the very significant differences to FTE staffing that can exist between 2 schools serving comparable intakes but of slightly different size.

C3 In connection with which, the following should also be noted.

School B

C4 School B has very recently had to formally restructure, so has had to pare down its staffing levels very considerably and is now operating with virtually no financial reserves – ie the staffing shown very close mirrors what it can reasonably expect to afford year on year into the future.

C5 Most year groups are close to full. However, the 6th form is not large – currently c100 total – and not all subjects available to pre-16 pupils can be offered post-16.

C6 The school is single site.

School A

C7 School A is currently in a more favourable position financially, still having access to some reserves built up in previous years – and therefore enjoying some small scope for leeway, where needed, in relation to overall FTE, particularly teachers. The likelihood for this school is that, over time, even on current funding levels, it will, at some point, have to pare back to some degree on its overall staffing FTE.

C8 This school also is close to full in most year groups but also has a much larger 6th form – currently c200. It also offers a very wide choice of subjects post-16, currently thought to be wide enough to accommodate a significantly larger 6th form without needing to timetable additional groups

C9 This school also is single site.

	School A 7FE c200 Post-16 Single Site	School B 6FE c100 Post-16 Single Site	Expanded Oaklands (Proposed) 6FE	Expanded Oaklands (Proposed) 7FE
--	--	--	---	---

Support Staff				
Business Manager	1	1	1	1
Finance	2	2	2	2
Head's PA	1	1	1	1
Admin	12	10	11	12
Data/Exams	2	3	3	3
LRC	1	1	1	1
Premises	5	3	4	4
ICT	3	2	3	3
Technicians	5	5	5	5
Teaching Assistants	19	17	18	19
Inclusion	14	11	12	14
Total FTE	65	56	61	65

Teaching Staff				
SLT	7	5	6	7
English	10.8	7.8	9	11
Maths	11.2	7.8	9	11
Science	12.8	8.6	11	13
Hums	9.8	9	9	10
MFL	4.8	3	4	4
Technology	2.8	2	3	3
Computing	2	2	2	2
Business	5	2	4	4
Art	2	2	2	2
Drama	2	2	2	2
Music	2	1	1	1
PE	4.6	4	4	4
SENCO	1	1	1	1
SEN-EAL	1	1	1	1
Other	0	0	3	3
Total FTE	78.8	58.2	71	79

Appendix D No Y7 admissions for Sept 2019

D1 The recommendation is that the educational arguments against admitting pupils to Raines Y7 in September 2019 massively outweigh any arguments in favour.

Arguments Against Admitting pupils to Raines Y7 for September 2019

D2 Pupils joining Y7 next September would be unacceptably educationally disadvantaged on a number of fronts.

D3 Firstly, by then the school will be widely known to be closing and the reasons for it – namely (a) serious underperformance – despite multiple interventions - over a lengthy period of time (b) serious and sustained lack of confidence in the school – as indicated by repeated low take up of available places and (c) financial unsustainability – linked to both the above.

D4 Secondly, once staff currently employed by Raines become aware of the impending closure, almost certainly the vast majority will begin looking for other jobs. As staff leave, they will inevitably have to be replaced by other staff on either fixed-term contracts or supply contracts. These replacement staff – having no long-term job security with Raines – will inevitably themselves be on the lookout for permanent posts. The likelihood is that some, at least, will find employment elsewhere and themselves move on – necessitating further staff changes.

D5 All pupils attending Raines through 2019-2020, at some point will have to navigate a change of school – whether to Oaklands or elsewhere. For pupils currently already on roll at Raines, there is no way this can be avoided. However, for pupils not yet on roll – ie prospective Y7 pupils – it can be, by ensuring they start their secondary school career elsewhere, with an expectation of being able to continue with that institution through to the end of Y11.

Arguments For Admitting pupils to Raines Y7 for September 2019

D6 The recommendation is that there are no obvious educational arguments for admitting pupils to Raines Y7 in September. The only arguments regarded as even worth considering all relate to possible legal challenges and potential negative publicity, as follows.

D7 The current situation, as understood, is that 29 families – ie all those having put Raines as first choice - have been formally told that their children have places in Raines Y7 for September.

D8 Assuming no admissions to Raines Y7, these parents will now all have to be told that the places they thought they were being guaranteed are no longer available. It may be that some parents will seek to challenge the decision to withdraw the places.

D9 Even if not, it may be that these same parents – for whatever reason - will to varying degrees be resistant to the idea of accepting a place at Oaklands. If so, considerable time and energy will need to be employed to finding appropriate places elsewhere.

D10 Further to point D9 above, it could turn out to be the case that an awkward proportion of the 29 did accept the immediate offer of a place at Oaklands – resulting in Oaklands having to run an additional Y7 class without necessarily accruing sufficient additional income to fully cover the costs of any additional teaching staff or other front-facing staff (eg teaching assistants) it might need to employ.

D9 Further to D8 above, depending on how details of the story reach the media, it may be that there will be negative reporting of the story. It is assumed that careful thought is already being given to the strategy for coordinated release of information relating to the likely closure of Raines.

This page is intentionally left blank

Raine's Foundation School

Public consultation on a proposal to close Raine's Foundation School from 31 August 2020 (including plans to expand nearby Oaklands Secondary School, for the transfer of Raine's pupils)

~~**This consultation closes on 24th July 2019**~~

The consultation document was amended on 3rd July 2019 and the closing date extended to 31st July 2019.

The amended sections have been struck through and replaced with new paragraphs on the following pages:

Page 3 - New date for consultation to close

Page 10 - What would happen to the children currently attending Raine's?

Page 12- 13 - Applications for admission to Year 7 for September 2019

Page 19 - New date for consultation to close

Contents

Introduction

1. Summary

2. Raine's Foundation School

3. Exploring the Different Options to School Closure

- Converting to academy status and joining a multi academy trust
- Federation
- Amalgamation with an existing Church of England School
- Reducing the School size through its Planned Admission Number
- Expanding the School

4. School Places and the Proposal to Close Raine's Foundation School

5. Managing the Closure of Raine's Foundation School

- What would happen to the children currently attending Raine's?
- How will this affect Raine's staff?
- A place at Oaklands School
- Will parents have to accept a place at Oaklands School?
- What about spiritual guidance and the Raine's legacy?
- What if a parent wants their child to continue at a Church of England school?
- How will this affect pupils in years 9 and 11?
- Applications for admission to Year 7 for September 2019
- Children with special educational needs and disabilities (SEND)
- Will parents get travel assistance for their child to attend an alternative school?
- What about help with a new school uniform?

6. Oaklands School

- Why does the LA need to expand an existing school?
- Why did the LA decide on Oaklands School?
- How will this affect pupils at Oaklands School?
- Will there be changes to the School's building(s)?
- How will this affect Oaklands staff?
- How will this affect the local community?
- Why are we consulting on this as part of the Raine's proposal?
- What will happen if the proposal to close Raine's as part of its amalgamation with Oaklands does not go ahead?

7. How parents and the public can give their views

- Your comments

8. Timetable

9. Raine's Foundation School Data

- A. Historical 1st Preference applications
- B. Historical and predicted number of pupils on roll
- C. Historical number of pupils on roll in the 6th Form
- D. The School's Financial Position

10. Maps

- 1. Where pupils currently attending Raine's Foundation live
- 2. Secondary schools in and around the Tower Hamlets area

Introduction

Tower Hamlets Local Authority, the Church of England London Diocesan Board for Schools (Diocese) and the Interim Executive Board (IEB), which is currently providing governance for Raine's Foundation School (Raine's), are considering the School's closure as part of an amalgamation with nearby Oaklands Secondary School.

This proposal is being made in response to the declining and now low number of pupils who attend the school (520 pupils attending a school with a capacity of 1050) and the significant financial problem this presents. There is every indication that the number of pupils attending Raine's will fall even further over the coming years. The Local Authority (LA) has a duty to secure high quality education for all children. Despite best efforts to find robust solutions, the LA and Diocese are unable to be confident that this School can become secure enough to provide the best quality education for the children of Tower Hamlets and surrounding areas.

The LA is therefore seeking the views of all interested parties on a proposal to close Raine's School as part of its amalgamation with Oaklands School with effect from 31st August 2020.

Please take the time to read this document and attend one of the meetings that have been arranged to discuss the proposal further, and ask any questions that you might have. Details of meetings can be found on page 18. This document provides details of the proposal, other options that have been considered, and how you can make your views known.

In reaching this stage the LA along with the IEB and the Diocese has explored a number of options to maintain the School, but none have proven to be feasible. The LA is aware that the previous Raine's Governing Body explored the potential for the School to convert to academy status, but decided against this option.

If Raine's School is to be closed a legal process will be followed and this is explained in Section 4 below. This public consultation is the first step of that process.

~~The final date for receipt of responses to this consultation is **24th July 2019.**~~

The final date for receipt of responses to this consultation has been extended because of amendments made to this document and is now **31st July 2019.**

1. Summary

Raine's School is located in the Bethnal Green area with a Planned Admission Number (PAN) of 150 and a total capacity for up to 1050 pupils (11-19).

It serves the local community, as well as a small number of pupils who live in neighbouring boroughs, mainly Hackney and Newham. Map 1 on page 21 shows where pupils' currently attending Raine's live.

The number of pupils applying for Year 7 entry at Raine's has been declining for some time (see Table A. on page 19). As a consequence, the pupil roll at the school has been falling over a number of years and pupil forecasts indicate that that the number on roll in Years 7 - 11 will continue to fall over the coming years (see Table B. on page 19).

Numbers on roll in the school's 6th Form have also declined and this is having an impact on the range of options and subjects available for post 16 students (see Table C. on page 19).

Because of the increasingly low numbers of pupils at Raine's (that are not predicted to increase), financial pressures have been building at the school which makes it financially unsustainable (see pages 5 and 6 and Table D on page 20 for more information). It is therefore necessary to consider options, including whether the school needs to close. In addition, it is proposed to expand nearby Oaklands School to provide places for all of the pupils currently on roll at Raine's. Oaklands School has been consistently judged by Ofsted as 'Good' and has amongst the highest GCSE outcomes in the borough. It is popular with local families due to its performance, effective governance and strong leadership. The school has the facilities to add more capacity and is well placed to provide a good education to additional pupils, without an adverse effect on standards. Oaklands is already providing support to Raine's as part of the LA intervention plan.

The IEB of Raine's has been in discussion with the LA and the Diocese about the declining number of applications and the predicted falling roll. Discussions have included consideration of ways for the school to secure its future and provide a better quality of education for its pupils. The options discussed include federating with another school, amalgamating with an existing Church of England school, reducing the intake of the school and expanding the school. Previously, the Governing Body of Raine's had considered joining an academy trust.

More detail on these options can be found on page 7. Unfortunately, none of the options discussed to sustain Raine's going forward appear achievable. The closure of the School, as part of a process of an amalgamation with nearby Oaklands School, seems the best option.

Details of the proposed closure of Raine's and the planned expansion of Oaklands School, along with information about the process, can be found from page 9 onwards.

2. Raine's Foundation School

Raine's aims to provide an environment that ensures all pupils can be the best they can be every day and achieve their potential in all aspects of life.

To achieve its aims it is critical that the school is able to fund and deliver a full range of educational and extra-curricular activities. Schools are funded by a national formula that is based on the number of pupils registered at the school as well as a lump sum. Low and falling numbers of pupils registered at a school result in less funding available, and difficulty in providing the full range of services needed.

When inspected by [Ofsted in November 2015](#), Raine's was judged to 'require improvement'. A Targeted Intervention Group (part of the LA strategy for raising school standards) consisting of LA officers was established in December 2015 to challenge and support the school's leaders. However, the school's GCSE results were poor in August 2016.

Pupil numbers, which were already declining, were further affected by the GCSE results alongside attendance and behaviour issues in the school. As a consequence, the school roll continued its downward trajectory. This had a detrimental impact on the budget resulting in sustained financial losses. The school applied to the LA for a licenced deficit (effectively a loan) of £1m and this was agreed in May 2017. The conditions of the licensed deficit required a staffing restructure to reduce the school's annual costs by approximately £900k and this was implemented in 2017-18. Savings were achieved largely through significant staffing reductions – a mix of redundancies and natural turnover. The ability of the school to repay the loan as well as meet its reduced running costs was based on an minimum Year 7 intake of 110 -120 pupils per year over a five year period.

Since 2014 the LA has been supporting Raine's with its pupil admissions through the development of scholarship programmes in both Modern Foreign Languages and Sports Studies; rewriting the school's admissions policy to encourage applications from children from all world faiths; and enabling the school to adopt the LA's arrangements for pupil banding to support its efforts to achieve a balanced ability intake. The LA facilitated the school efforts to boost its admissions numbers by appointing the Raine's headteacher to the [Tower Hamlets School Admissions Forum](#) and reserving places at Raine's for pupils who were unsuccessful in securing places at any of the preferred schools at secondary transfer. Development of the former Raine's Lower School at Old Bethnal Green Road in order to provide more attractive facilities was supported by a capital investment of £4m from the LA. Despite this and further extensive effort by the school and LA's School Admissions staff, Raine's could not achieve the pupil numbers required to enable it to secure its financial sustainability and reduce its budget deficit. Table D on page 20 shows the historical financial position at Raine's and the predicted budget deficit based on projected admission numbers. The school's current roll and projected numbers demonstrate that it is highly unlikely to recruit the pupil numbers necessary to address its current funding shortfall, repay its licensed deficit and move onto a financially sustainable footing.

In October 2017 Raine's was re-inspected by [Ofsted](#) and again it was adjudged to 'require improvement'. The LA continued its targeted support to the school and early in January 2018 it was agreed that the school would keep parents informed of

the situation and the improvement work that it would be undertaking with the support of the LA and the Tower Hamlets Education Partnership (THEP).

In the summer of 2018, the school had a further [Ofsted](#) visit. The inspector reported significant concerns about the standards of pupil behaviour. The LA also determined that, at that time, the school's standards and effectiveness was showing no real sign of significant improvement and this was partly due to a serious breakdown in the way the school was being governed.

The publication of the school's [GCSE results in August 2018](#) showed that school leaders and governors had overseen a further decline in standards of achievement. The progress pupils had made by the end of year 11 was very low in comparison with other schools nationally. Pupils achieved, on average, almost a grade lower than pupils in other Tower Hamlets schools.

The new support package agreed with LA and THEP for the 2018-19 school year involved the headteacher of Sir John Cass's Foundation and Redcoat Church of England Secondary School, Mr Paul Woods, joining Raine's as interim executive headteacher from September. However, the LA was also concerned that the Governing Body was not functioning effectively and was failing in its responsibilities. The Governing Body had not taken necessary or appropriate action to address the key issues identified by Ofsted or held school leaders to account. In September 2018 the LA took steps to address its concerns, the Governing Body was dissolved and an Interim Executive Board (IEB) established to provide effective governance for the School.

Since being appointed to the school, the IEB and school leaders have invested significant time, effort and determination to improve the performance at Raine's. The changes brought about in the school were noted as positive in the [Ofsted monitoring visit undertaken in December 2018](#). However, at this time parents had already made their choice of secondary school place. Only 29 pupils applied to Raine's as their first preference for entry to Year 7 in September 2019.

Following the monitoring visit and in consultation with Mr Paul Woods, it was agreed by the LA, Diocese and school governing bodies that Oaklands School, which is also in Bethnal Green, would become the support school to Raine's from April 2019 with Ms Patrice Canavan taking over as Executive Headteacher from Mr Paul Woods and Mr Simon Ramsey of Oaklands becoming interim headteacher.

Oaklands has been consistently judged as 'Good' and has one of the highest GCSE outcomes in the borough. Its close proximity to Raine's allows for a support package that draws on staff capacity from within Oaklands..

In January 2019 the school was half full with only 520 pupils on roll in Years 7 to 13, compared to a potential capacity of 1050. The low numbers of applications for admission to Year 7; the low pupil numbers across existing year groups; and the findings from a DfE commissioned financial review, made it necessary for the LA to and Diocese to consider various options before deciding on the current proposal to close the school. These options are explained below.

3. Exploring Different Options to School Closure

Converting to Academy status and joining a Multi- Academy Trust

Academy schools are state-funded and are directly funded by the Department for Education (DfE) and independent of LA control. A Multi-Academy Trust has one board of directors responsible for all schools in the trust. The LA and Diocese explored the potential for Raine's to convert to Academy status and join a Multi - Academy Trust. However, following discussions with the Diocese, and mindful of the requirements set by the DfE, it was evident that the school's current performance standard, together with the unlikelihood of it ever becoming financially self-sustainable, would prevent a successful application for it to convert to an Academy with the option to join an existing Multi -Academy Trust.

Federation

A federation is a group of maintained schools under one Governing Body. In this example the school's leadership would be taken on by a new organisation. Cost savings would be achieved through the sharing of services, and in the case of smaller secondary schools like Raine's, usually a smaller leadership structure overseen by an Executive Headteacher who manages more than one school. This was fully explored and found not to be feasible.

Amalgamating with an existing Church of England School

An amalgamation is where two schools join together to create a new school, requiring the closure of both schools. Or where one is closed and another nearby school is expanded to accommodate the pupils from the school that closes.

The option of amalgamating Raine's with an existing Church of England Secondary School in Tower Hamlets was explored with the Diocese, but this was subsequently deemed not possible, given the distance between the two schools and that they served different communities.

Reducing the school size through its Planned Admission Number

One way to improve the financing of the school is to ensure that classes are as close to full as possible (at 30 pupils per class), which can save money on teaching staff. A smaller planned admission number, say 4 form entry (120) instead of the current 5 form entry (150) would mean the school could plan for fewer pupils and therefore operate fewer classes with fewer staff whilst still accommodating a smaller number of pupils on roll. However, when reviewing the school's financial position this option did not prove viable as the school was continuing to experience a significant decline in applications for entry to year 7 and also in other year groups. It was already substantially below the 4fe pupil number necessary to secure it financially. This is because a school has a level of staffing and other fixed costs that need to be met, and these costs would not have decreased significantly by reducing its size. Please see Table D on Page 20 for a summary of Raine's financial position and the minimum numbers of registered pupils that the school would need to recruit and maintain across all year groups (7 – 11); to address its funding shortfall, repay its licensed deficit and move the school onto a financially sustainable footing.

Expanding the school

Although this may, at first, seem counterintuitive it is sometimes necessary to consider significant investment into a school to enable it to attract pupils. In this case, because the local primary aged population is declining, and there is already strong performance in other nearby schools, there was no evidence to suggest that investment in an expansion would result in a larger number of pupils on roll at Raine's. The LA was mindful of its previous longstanding and extensive efforts to boost application numbers for Raine's, which was largely unsuccessful and mainly due to the school's past poor performance. The LA also considered that the current plans for new housing in and around Tower Hamlets are focussed mainly in other areas, to the east of the Borough. The likely number of additional children that will result from new housing developments is set out in the [LA's annual report on its planning for school places](#) and taken account of when considering the number of school places required.

4. School Places and the Proposal to Close Raine's Foundation School

The LA has a duty to ensure that there are sufficient good quality school places for children living in Tower Hamlets; in order to do this the LA monitors birth rates, GP registrations, new housing developments and patterns of school preference. This information is used to project pupil numbers as well as to ensure there are sufficient school places across the borough.

A proposal to consult on the closure of Raine's on 31st August 2020, as part of an amalgamation with Oaklands School, has been agreed with the schools' Governing Bodies and the Diocese. It is being put forward in consideration of the following:

- the low and falling number of pupils attending Raine's
- the financial implications for the school,
- the need to continue to provide high quality education for Raine's pupils: and
- the strong performance and capacity of Oaklands School.

If a decision is taken progress the proposal to close Raine's School as part of its amalgamation with Oaklands School, the process will involve six steps.

Step one

Consultation (June - July 2019) - on the proposal to close Raine's School as part of its amalgamation with Oaklands School.

Step two

Decision (September 2019) - The consultation will inform the decision by Council in September 2019 on whether or not to issue a statutory notice.

Step three

Publication* (Nov 2019) – publishing of a statutory notice and proposal to close Raine's School as part of its amalgamation with Oaklands School.

Step four

Representation (Nov - Dec 2019) - period for further responses to the proposal in the statutory notice.

Step five

Decision* (Feb 2020) - to be taken by Council following the representation period.

Step six

Implementation* (Mar - Aug 2020) - if the decision is taken to close Raine's as part of its amalgamation with Oaklands School.

***These stages will apply only if the proposal is approved by the Council**

More information on the process can be found at:

The timetable for this process in relation to the closure of Raine's can be found on page 18. The next two sections contain information on the implications for current and prospective pupils and parents of Raine's and Oaklands schools, should a decision be taken to close Raine's as part of an amalgamation with Oaklands School on 31st August 2020.

5. Managing the Closure of Raine's Foundation School

The following sections answer questions that parents may have if the decision is taken to close Raine's as well as expand Oaklands School to provide places for Raine's pupils. There is also information on how to make your views on the proposal known, and the timetable that will be followed for the decision making process.

What would happen to the children currently attending Raine's?

~~If the decision is taken to close Raine's, a place at Oaklands School will be made available for any child currently attending Raine's in years 7 to 11, should their parents wish to take it up. Children who have applied to Raine's for admission to Year 7 in September 2019 have already been offered a place at Oaklands, given that Raine's will not be having a Year 7 intake for this year (see page 12). School transfers will be facilitated by the LA's School Admissions Team.~~

On 3rd July 2019 this consultation document was changed. The above struck through text was deleted. The new text states:-

If the decision is taken to close Raine's, a place at Oaklands School will be made available for any child currently attending Raine's in years 7 to 11, should their parents wish to take it up. Children who have applied to Raine's for admission to Year 7 in September 2019 have also been offered a place at Oaklands. School. Those who chose to transfer will be facilitated by the LA's School Admissions Team.

For any parents not wanting a place at Oaklands, an application can be made through the normal in-year admissions process for an alternative school for September 2019 or 2020. Applications should be made to the LA's School Admissions Team and this would then be considered in line with the particular school's published admissions criteria and the school's current number on roll in the relevant year group. These applications will be coordinated by the LA to ensure that each application is treated in the same way. Information about applying for an alternative school place is available from the School Admissions Team who can be contacted on 020 7364 5006 or school.admissions@towerhamlets.gov.uk.

How will this affect Raine's staff?

The decision on the closure of Raine's will not be made until February 2020, which would mean the earliest closure could take place is August 2020. The LA will continue to support the school to retain staff through the current period of uncertainty. As it is difficult to recruit teaching staff, all teachers at the school will be given a retention allowance from 1st September 2019. All staff will continue to have

access to professional development opportunities and support to apply for other jobs. Raine's staff will be given first consideration for any vacancy at Oaklands School. If the decision is taken to close Raine's then for staff that have not secured alternative employment, the likely outcome is redundancy in August 2020.

A place at Oaklands School

Oaklands School has been consistently judged as a 'Good' school by Ofsted, as confirmed by its most recent [Ofsted inspection](#) in January 2017. The School's GCSE and A level results have remained amongst the highest in the borough.

If the decision is taken to close Raine's, Oaklands will welcome new children and provide support for families from Raine's that choose to take up a place. Oaklands is being supported by the LA and Diocese to do so through plans to expand and improve its existing accommodation (see pages 14 and 15).

Ms Patrice Canavan, the Interim Executive Headteacher of Oaklands and Raine's schools, will be able to show parents and children around Oaklands as well as discuss their needs should they take up a place there. Information about Oaklands can be found at:

<http://www.oaklands.towerhamlets.sch.uk/>

Will parents have to accept a place at Oaklands School?

A number of pupils attend Raine's School from some distance away, and so other schools local to their home address may be preferable than a place at Oaklands. Parents can therefore apply for other schools, both in and outside Tower Hamlets, and this will be facilitated by the LA's School Admissions Team. Map 2 on page 22 shows other local schools.

What about spiritual guidance for Raine's children transferring to Oaklands School and the Raine's legacy?

The LA is aware of the importance of keeping the name of Henry Raine alive in the borough and we are discussing how best to achieve this with the Raine's Foundation Trust.

The LA is very aware of the need to preserve the distinct aspects of a Church of England education, such as having arrangements for spiritual guidance and worship in place for Raine's students within the Oaklands provision. The LA is taking advice from the Diocese on this important matter.

What if parents want their children to continue at a Church of England school?

There are other Church of England schools in Tower Hamlets and inner London areas as follows:

- [Sir John Cass \(Tower Hamlets\)](#) – 1.4 miles
- [The Urswick School \(Hackney\)](#) – 1.8 miles

- [St Mary Magdalene Academy Secondary School](#) (Islington) – 3.6 miles
- [Bacon's College \(Southwark\)](#) – 4 miles
- [St Saviour's and St Olave's School \(Southwark\)](#) – 4.8 miles
- [St Mary Magdalene School \(Greenwich\)](#) – 5.3 miles

It is recognised that, for some parents, a place at a church school is something they value for their child. Parents are entitled to apply for other church schools in the normal way and their application would be considered under the admission arrangements for the relevant school(s). The consultation on the future of Raine's and any decision in relation to this would not disadvantage any application for any other church school.

How will this affect pupils in Years 9 and 11?

Pupils currently in Year 9 at Raine's will be able to continue at the school for the 2019/20 school year and then move to Oaklands to complete their GCSE studies from September 2020. This is currently being co-ordinated between Oaklands and Raine's staff and is being overseen by the Interim Executive Headteacher for both schools.

Year 9 pupils will also have the option to transfer to an alternative school from as early as September 2019 and for the start of their Year 10. Throughout the remainder of the summer term the arrangements for school transfer applications for Raine's students will operate separately to the published timetable. The LA's School Admissions Team will be holding regular surgeries at Raine's for parents and pupils to discuss their particular circumstances, preferences and the choices open to them.

Pupils currently in Year 11 that have been offered a place at Raine's will have the option to continue their 6th form studies at Oaklands. Raine's staff are already having detailed discussions with parents and students about the Post-16 offer at Oaklands to make sure it's right for them.

Year 11 pupils will also have the option to transfer to other 6th form provisions and this is being co-ordinated with support from the LA's School Admissions staff.

Secondary headteachers at other secondary schools are aware of the proposals and are supportive of the arrangements to ensure that Raine's pupil transfers are as smooth as possible.

Applications for admission to Year 7 for September 2019

The LA has decided that Raine's should not have an intake to its Year 7. This is because applications for Year 7 at Raine's has been declining over a number of years and the school received only 29 first preference applications for places in September 2019. With such a small number it would have proved very difficult, if not impossible, to provide a broad and balanced curriculum to this group of children. This would be difficult even in a securely good, well-funded school and it therefore led the LA to a decision that there should not be a Year 7 intake at Raine's this year, although this will not prejudice the final decision after the consultation

Parents of these children have been offered places at alternative schools, mostly at schools where they had previously expressed a preference. Those children who

could not be offered a place at a school they named as an alternative preference have been reserved a place at Oaklands.

On 3rd July 2019 this consultation document was changed. The above struck through text was deleted. The new text states:-

Applications for admission to Year 7 for September 2019

Applications for Year 7 at Raine's have been declining over a number of years and the school received only 29 first preference applications for places in September 2019. With such a small number it will be very difficult, if not impossible, to provide a broad and balanced curriculum to this group of children.

Parents are able to enrol children for Year 7 if they chose to do so. However, they should be aware that there is a significant risk that the year group may be very small. If that proves to be the case, the school may exercise its management powers to provide the education for those children at the site of a neighbouring school, to enable them to receive a full curriculum.

To ensure that they have options in light of the uncertain future of Raine's, parents of these children have also been offered places at alternative schools, mostly at schools where they had previously expressed a preference. Those children who could not be offered a place at a school they named as an alternative preference have been reserved a place at Oaklands.

Children with special educational needs and disabilities (SEND)

The Tower Hamlets SEND Team will make arrangements to meet all parents of children with special educational needs over the remainder of this term to discuss the arrangements for their future education and to plan future options, should a decision be taken to close Raine's. Reviews for children with an Education, Health and Care Plan and SEN Support will be arranged to ensure that potential transitions can be planned effectively.

Should parents choose a school other than Oaklands, the SEND Team will ensure that the distance that pupils will need to travel is minimised and that support will be in place as they move. It will also work in partnership with new schools and other LAs, where necessary, to ensure that children's learning needs continue to be met. Consideration will be given to the schools' SEND information in terms of curriculum, range of interventions and staff expertise in order to achieve pupil's planned outcomes.

Where parents have concerns and wish to receive further advice we will arrange for them to be supported by our [SENDIASS Team](#).

Will parents get travel assistance for their child to attend an alternative school?

Any application for assistance with travel to an alternative school will be considered in line with LA's current school travel assistance policy and support will be provided, if the policy criteria are met.

https://www.towerhamlets.gov.uk/lgnl/advice_and_benefits/grants/school_travel_support.aspx

What about help with a new school uniform?

The Local Authority is aware that for some families an unforeseen change of school requiring a new school uniform will be a significant additional expense. Assistance will be provided for parents to purchase a new school uniform when this is required. The payment will be in line with the current school clothing grant that is provided for children when they transfer from primary to secondary school. More information and an application form can be obtained from the LA's School Admissions Team.

6. Oaklands School.

As part of the proposal to close Raine's the LA will expand the Published Admissions Number (PAN) for Oaklands School, initially by two forms of entry, and increase its capacity so that it becomes a six form entry school with the potential to increase to seven forms of entry, if required.

The table below details the current and proposed number on roll for the school and the changes to the PAN will be the only changes to the school's admissions arrangements as a result of its expansion.

Age Range	Number on Roll	Proposed Number on Roll	Total increase in places
11-19	800	1200	400

As a result of increasing the PAN at the school to enable it to take more children, including those moving from Raine's, additional space will be required. This is discussed in more detail below. This increase in the Oaklands PAN will be in place by September 2020 and will enable Oaklands to provide places for children at Raine's, should it be determined that this school will close at the end of the 2019/20 school year.

Why does the LA need to expand an existing school?

The LA has a statutory duty to provide each child in its area with an appropriate school place and ensure that it promotes diversity, mindful of parental preference. It will therefore closely monitor the numbers of school places available and the demand for those places across its area. Despite current plans to increase secondary school places in Tower Hamlets, the LA's pupil projection data estimates that the closure of Raine's could lead to a shortfall in places in Bethnal Green, if it does not act and increase the number of places in good schools available locally.

Why did the LA decide on Oaklands School?

When deciding on which school(s) should be expanded the LA will set out a number of criteria i.e. whether the school was in the right geographical location; whether it was popular with local families; whether it was possible to add more capacity; whether it had effective governance and strong leadership; and whether it was well placed to provide a good education to additional pupils. Oaklands was chosen because it met these requirements and is therefore best placed to accommodate extra pupils without an adverse effect on standards. Oaklands is already providing support to Raine's as part of the LA intervention plan.

How will this affect pupils at Oaklands School?

Pupils will notice some changes, but these are likely to be limited. Oaklands will organise its provision slightly differently and its 6th Form will be moved offsite to provide additional classrooms at the existing building for when pupils join from Raine's. There will also be some significant modifications to the existing building to improve the facilities for all children as well as cater for the additional 60 pupils per year from 2020 onwards. It is expected that curriculum and standards will not be adversely affected by these changes and improvements to the school's facilities.

Will there be changes to the School's building(s)?

Yes, the planned expansion to the number of places means that the school will move its 6th form to a nearby remodelled provision on the site of the former Raine's Lower School at Old Bethnal Green Road.

There will also be some significant work on the school's existing building to provide additional teaching spaces and improved facilities for all students. The LA will ensure that the new teaching spaces are built in line with government standards and that the construction methods used will not disrupt pupils' learning and all users remain safe. No play space will be used for this expansion and no sports or recreational facilities will be lost and the pupils will also benefit from additional facilities on the new 6th form site.

To facilitate the planned expansion and ensure that any necessary work on the existing building can be completed in time, the 6th form will move to the former Raine's Lower School site from September 2019.

How will this affect Oaklands staff?

Staff at Oaklands will generally be unaffected, but there will be a need to increase staffing. A larger school will offer more opportunities for their professional development.

How will this affect the local community?

Children and families will benefit from there being more places at a popular nearby school enabling them to continue their education within the local area. It is also likely to be beneficial for community cohesion by providing all members of the community equal opportunity to access a high quality local school provision.

Why are we consulting on this as part of the Raine's proposal?

There is a statutory process that must be followed to make these sorts of changes to schools. At the moment we are entering the consultation stage during which we are inviting views on the proposal from anyone, including pupils, parents, staff, the local community, all schools, neighbouring authorities, local councillors, members of parliament and professional associations.

What will happen if the proposal to close Raine's as part of its amalgamation with Oaklands does not go ahead?

If the Council eventually takes the decision that Raine's will not amalgamate with Oaklands School then Oaklands will continue to operate at its current size and discussions will take place with the Diocese about terminating the lease for the Raine's Lower Site. The LA will need to reconsider how additional places at this popular and successful school can be provided.

7. How parents and the public can give their views

A series of meetings have been arranged, including two public meetings, to provide an opportunity for parents, staff, pupils and members of the local community to ask questions and express their views on the proposals outlined in this document.

At this stage no decision on the closure of Raine's as part of its amalgamation with Oaklands School has been made, and all the views received, either at the meetings or separately in writing, will be considered prior to a decision being taken as to whether to go ahead with the proposal.

While this is a consultation on a proposal to close Raine's, it also includes plans to expand nearby Oakland's Secondary School, for the transfer of Raine's pupils. Other options have been considered, and your views and opinion on other potential options to secure the future of Raine's and/or its pupils are welcome.

The following public meetings have been arranged for any who wish to attend:

Time and Date: 6pm 19th June 2019
Location: Oaklands Community School,
Old Bethnal Green Road,
Bethnal Green,
E2 6PR

Time and Date: 6pm 26th June 2019
Location: Raine's Foundation School
Approach Road,
Bethnal Green,
E2 ELY

Separate meetings have also been arranged for staff and parents at both Raine's and Oaklands Schools. Parents and staff will receive information on these meetings directly

The LA will also be seeking the views of other interested parties, such as local schools, diocesan boards, council of mosques, neighbouring local authorities and trade unions, local councillors, members of parliament and professional associations.

Prior to this consultation, meetings have taken place with Raine's staff and parents.. Pupils have been involved through assemblies and individual meetings with key year groups.

Your comments

You are invited to respond to this consultation by visiting the Council's consultations web page and completing an electronic feedback form:

https://www.towerhamlets.gov.uk/lgn/council_and_democracy/consultations/consultations.aspx

Alternatively, you may wish to write to or email your comments to the addresses given below by **Wednesday 24th July 2019 31st July 2019**.

School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children's Services
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

school.organisation@towerhamlets.gov.uk

All comments received through these mechanisms or made directly to Council officers or members will be collected to be included in the analysis of feedback received.

Tower Hamlets Council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information the privacy notice for Pupil Services can be accessed [here](#).

Your answers to this consultation will only be used to assess the community's view of the proposed closure of Raine's and the proposed expansion of Oaklands School and not for any other purpose. It is an opportunity for you to draw the Council's attention to any material facts that should properly be taken into account before deciding on whether it proceeds on its proposed course of action.

If you would like to discuss the proposal you can contact Terry Bryan, Head of Pupil Services and School Sufficiency on tel: 020 7364 4304. You can also contact the Chair of the Joint Governing Body Steering Group, which has been established to lead the consultation with both school communities and undertake the necessary detailed work so that the Governing Bodies can make their recommendations to the LA:

steeringgroup@rainesfoundation.org.uk.

They will either be able to discuss your particular matters directly, or make sure you can speak to the most appropriate person to support you.

The information contained in this document can be made available in alternative formats: large print, Braille, audio tape or disk and can be translated on request.

8. Timetable for the consultation, decision making and implementation process

The consultation period will run from the Monday 10th June to Wednesday 24th July 31st July 2019

Below is the estimated timetable for the decision making process:

Date	Activity
10 June 2019	Consultation commences
19 June 2019	Public meeting for parents, carers, staff and the local community to be held at 6:00pm at Oaklands Community School, Old Bethnal Green Road, Bethnal Green, E2 6PR.
25 June 2019	This proposal will also be considered as part of the Children and Education Overview and Scrutiny Sub-Committee on Tuesday 25 th June 2019. This meeting is open to the public to attend and the agenda is published one week in advance of the meeting. For more information please visit: http://democracy.towerhamlets.gov.uk/mgAgendaManagementTimetable.aspx?XXR=0&DD=2019&RP=973&ACT=Find For more information on the scrutiny function of this committee please contact Elizabeth Freer (Strategy and Policy Manager, Children and Culture): Elizabeth.Freer@towerhamlets.gov.uk
26 June 2019	Public meeting for parents, carers, staff and the local community to be held at 6:00pm at Raine's Foundation School, Approach Road, Bethnal Green, E2 ELY.
Other meetings will also be held during the consultation, specifically for staff and for parents, and they will receive information about these meetings directly.	
24 July 2019 31 July 2019	End of consultation period
July/August 2019	Report prepared for council cabinet
September 2019	Decision by Council on whether to publish a Statutory Notice and proposals to close Raine's Foundation School as part of its amalgamation with Oaklands School.
October 2019	Statutory Notice and Proposals drafted* (if decision above is to proceed with the closure and amalgamation process) and start of the formal representation period.)
4 November 2019	Publication of Statutory Notice and proposals
2 December 2019	End of statutory period for representations and final date for responses to the proposal.
January 2020	Report prepared for council cabinet
January 2020	Decision taken by Council on the closure of Raine's Foundation School as part of its amalgamation with Oaklands School*
31 August 2020	Raine's Foundation School closes as part its amalgamation with Oaklands School*

*These stages will apply only if the proposal is approved by the Council

9. Raine's Foundation School Data

Table A - Historical 1st Preference Applications

The table below shows the number of first preference applications for admission to Raine's in Year 7 for the past six years. The number of applications for admission to Year 7 in September 2019 was so low that it may prove very difficult, if not impossible, to provide a broad and balanced curriculum to this group of children.

School Year	2014	2015	2016	2017	2018	2019
1st Pref Applications	65	62	57	62	45	29

* Based on applications at the secondary transfer (31st October) closing date.

Table B - Historical and Predicted Number of Pupils on Roll

The table below shows the number of pupils on roll at Raine's for the past four years and the projected pupil roll for the next four years, based on current application and enrolment trends. The number of pupils on roll at Raine's has declined over several years, despite a steady increase in the borough's year 7 cohort.

School Year	Historical Number on Roll (Yr 7 - 11)				Predicted Number on Roll (Yr 7 - 11)			
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Number on Roll	518	437	430	388	346	301	275	221

*Based on January Pupil Census.

Table C - Historical Number of Pupils on Roll in the 6th Form

The numbers of students in the Raine's School 6th Form has also declined since 2014, with only 132 students across the two year groups. It is also well below the DfE's recommended minimum size of 200 students for a School 6th Form. The breadth of choice available to 6th form students is also below the DfE's recommendation of at least 15 A level subjects. The School's 6th form is not therefore sustainable, given the current student numbers, limited curriculum and recent government changes to Post-16 funding arrangements.

School Year	Historical Number on Roll (Yr 12 and 13)					
	2014	2015	2016	2017	2018	2019
Number on 6 th Form Roll	157	160	151	122	132	132

*Based on January Pupil Census.

Table D - The School's Financial Position

Based on the predicted numbers on roll, Raine's Foundation School's current and projected budget is not sufficient to meet its ongoing costs. Staff pay is the single most expensive item in the school budget and it typically represents 70% of expenditure.

The school would require a minimum stable roll of 550 - 600 pupils in Years 7 -11 to address its funding shortfall, repay its licensed deficit and thereby enable it to reach a financially sustainable position.

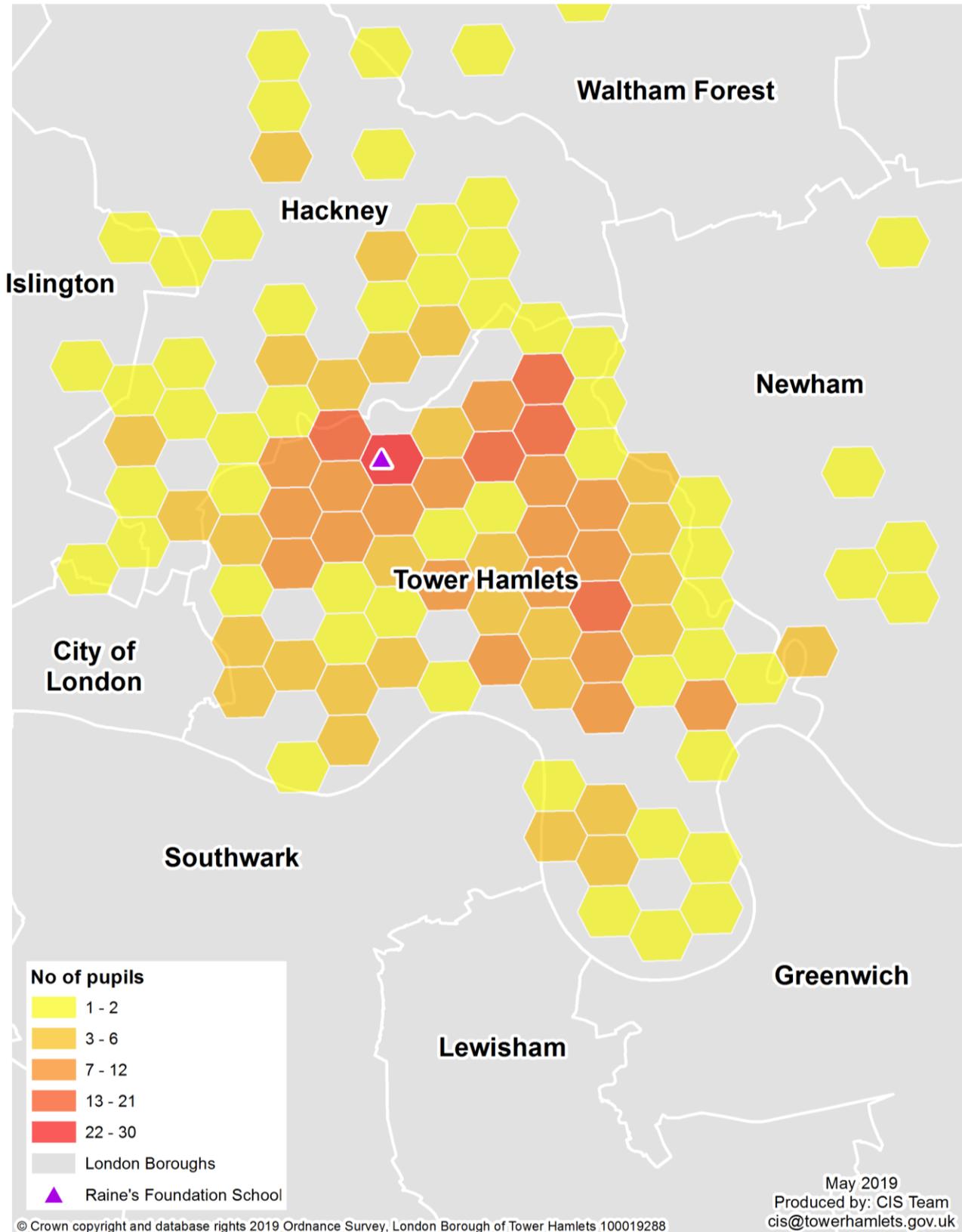
School Year	Historical Number on Roll (Yr 7 -11)				Predicted Number on Roll (Yr 7 - 11)			
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Number on Roll	518	437	430	388	346	301	275	221
Budget	4.010m	3.526m	3.447m	3.136m	2.754m	2.360m	2.124m	1.681m
Running costs (exclude employee costs)	1.170m	1.170m	1.170m	1.170m	1.170m	1.170m	1.170m	1.170m
Employee costs (70%)	2.768m	2.433m	2.379m	2.164m	1.928m	1.652m	1.487m	1.177m
(Deficit) / surplus	72k	- 77k	- 102k	- 198k	- 344k	- 462k	- 533k	-666k

Pupil numbers determine the school budget. With these low numbers, and a reduced budget, Raine's will have to significantly reduce its staffing. The school is projecting deficits in year of £344k in 2019/20 and £462k in 2020/21, and a cumulative deficit of approx. £2.4m by 2022/23. A previous licensed loan from the LA for £1m in 2017-18 would also need to be added to this deficit, bringing its total to £3.4m. These figures are based on pupil number assumptions of 346 in 2019/20 and 301 in 2020/21. The position will be worse if pupil numbers decline further. The school improvement support costs are in addition to this sum.

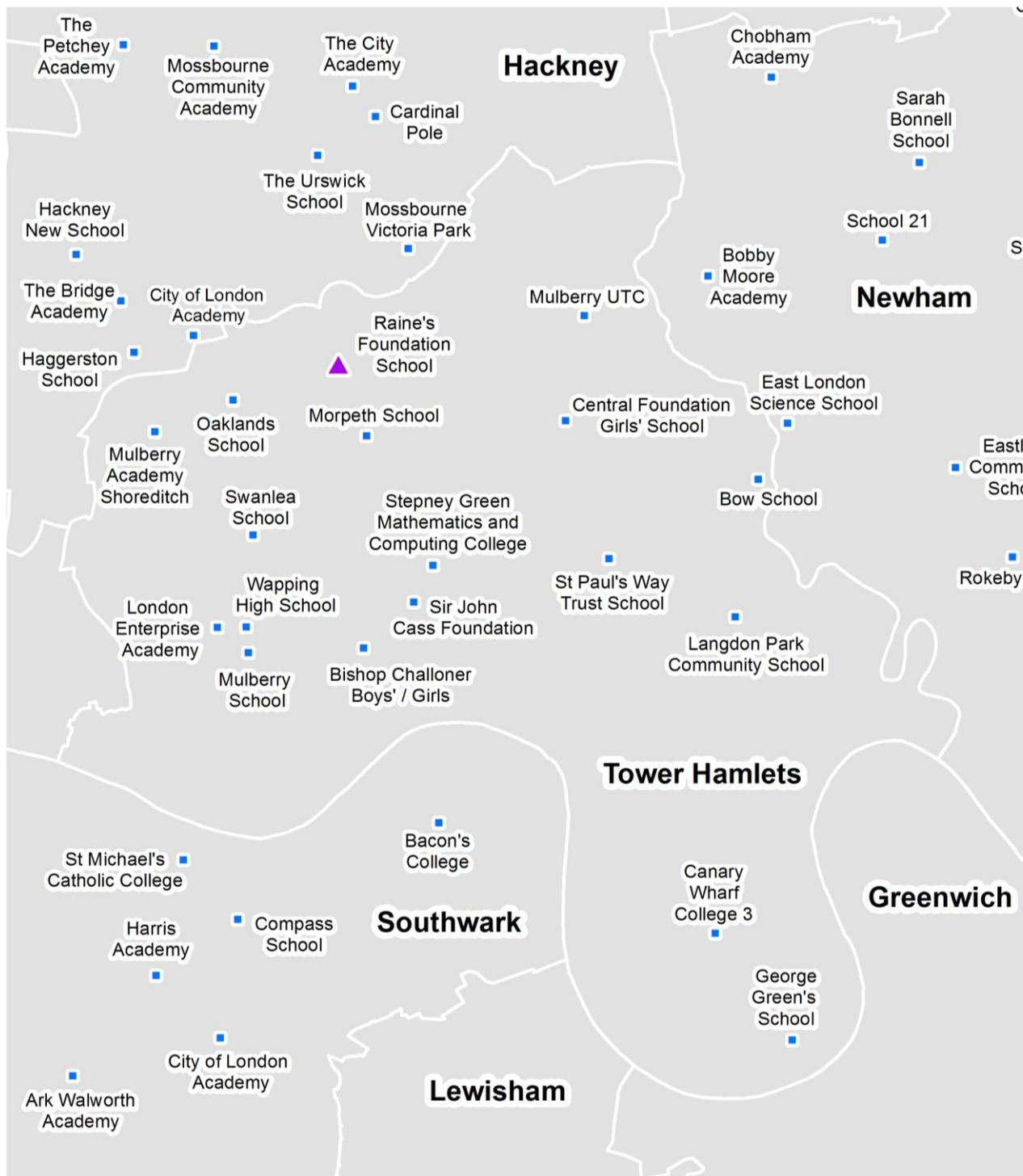
Based on the current position and the predicted number on roll over the foreseeable future, there appears to be no reasonable prospect of recovery for Raine's.

10. Maps

Map 1 - Where pupils currently attending Raine's Foundation School live



Map 2 – Secondary Schools in and around the Tower Hamlets area



- ▲ Raine's Foundation School
- Other Secondary School's
- London Boroughs

© Crown copyright and database rights 2019 Ordnance Survey, London Borough of Tower Hamlets 100019288

May 2019
 Produced by: CIS Team
 cis@towerhamlets.gov.uk

All map data sourced from: <https://get-information-schools.service.gov.uk/>

End.

This page is intentionally left blank

PUBLIC CONSULTATION QUESTIONNAIRE

If you would like a copy of the outcome of the consultation emailed to you please include:

Your name:

Your email address:

1. **Have you read the Consultation Document:** On the proposal to close Raine’s Foundation School from 31 August 2020 (including plans to expand nearby Oakland’s Secondary School, for the transfer of Raine’s pupils)

- a. Yes
- b. No

2. **What is your interest in this issue:**

- Member of staff at Raine’s Foundation School
- Member of staff at Oaklands School
- Parent / carer of a child / ren at Raine’s Foundation School
- Parent / carer of a child / ren at Raine’s Oaklands School
- Student at Raine’s Foundation School
- Student at Oaklands School
- Member of Raine’s Foundation Trust
- Local Resident
- Prefer not to say
- Other (please specify)

3. **Do you have any comments about the proposed closure of Raine’s Foundation School?**

4. **Do you have any comments about the proposed expansion of Oaklands School?**

5. **Do you have any comments about the proposed amalgamation of Raine’s Foundation School with Oaklands School, by closing Raine’s Foundation School and expanding Oaklands School?**

6. Do you have any alternative suggestions to the options presented in this consultation?

About you

The Council has a legal duty to comply with the Equality Act 2010. A key part of the Act involves taking the necessary steps to collect equality data on our residents.

We are endeavouring to receive comments from a broad range of people reflective of our community to understand how different groups of people might be affected by the proposals. In order to enable us to assess the potential impact on these groups, it would be helpful if you could complete the section below, however, completion of the form is optional. For more information the privacy notice for pupil services can be accessed [here](#).

1. How old are you?

- 0-15
- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85+
- Prefer not to say

2. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to old age)?

- Yes
- No
- Prefer not to say

Please state the type of health problem or disability that applies to you?
(People may experience more than one type of disability or health problem, in which case you may indicate more than one. If none of the categories applies, please mark 'Other' and specify the type of health problem or disability.)

Sensory impairment, (such as being blind / having a visual impairment or being deaf / having a hearing impairment)	
Physical impairment, (such as using a wheelchair to get around and / or difficulty using your arms)	
Learning disability, (such as Downs syndrome or dyslexia) or cognitive impairment (such as autism or head-injury)	
Mental health condition, (such as depression or schizophrenia)	
Long-standing illness or health condition (such as cancer, HIV,	

diabetes, chronic heart disease, or epilepsy)	
Prefer to self-describe (please specify):	
Prefer not to say	

3. Which best describes your gender?

- Male
- Female
- Prefer not to say
- Prefer to self-describe (please specify):

4. Is your gender identity the same as the sex you were assigned at birth?

- Yes
- No
- Prefer not to say

5. Which of the following describes your sex?

- Man
- Woman
- Intersex
- Prefer not to say
- Prefer to self-describe (please specify):

6. Are you legally married or in a civil partnership?

- Yes
- No
- Prefer not to say

7. Which best describes your current marital, civil partnership or cohabitation status?

- Single (never married or never registered a civil partnership)
- Married
- In a registered civil partnership
- Separated, but still legally married
- Separated, but still in a registered civil partnership
- Divorced
- Formerly in a registered civil partnership which is now dissolved
- Widowed
- Surviving partner from a registered civil partnership
- Cohabiting with a partner
- Prefer not to say

8. How would you describe your ethnic group?

- White:**
- British
 - Irish
 - Traveller of Irish heritage
 - Gypsy / Roma
 - Any other White background

Mixed:

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed background

Asian / Asian British:

- Indian
- Pakistani
- Bangladeshi
- Any other Asian background

Black / Black British:

- Somali
- Other African
- Caribbean
- Any other Black background

Other ethnic group:

- Chinese
- Vietnamese
- Any other background
- Prefer not to say

9. What is your religion or belief?

- No religion or belief
- Agnostic
- Muslim
- Christian
- Jewish
- Buddhist
- Sikh
- Hindu
- Humanist
- Prefer not to say
- Prefer to self-describe (please specify):

10. Which of the following describes your sexual orientation?

- Gay man
- Gay woman/lesbian
- Bisexual (attracted to men and women)
- Heterosexual/straight
- Prefer not to say
- Prefer to self-describe (please specify):

11. Do you have caring or parenting responsibilities? (for example, childcare or dependent adults)

- Yes
- No
- Prefer not to say

1. Why was Raine's School an option at the point of application?

At the time when parents were able to apply for places at Secondary transfer (i.e. September 2018) the LA and Diocese was not certain that they would eventually need to consider the closure of Raine's. This became evident in the late spring of 2019, and after the school's application numbers had fallen to a level that only 36 offers could be made for admission to Year 7 for September 2019.

2. How many children were offered a place at Raines for Sep 2019?

36 children were offered a place at Raine's on the 1st March. So far the parents of:

- 19 have received and accepted offers at alternative preference schools
- 8 are awaiting offers at alternative preference schools
- 7 have accepted the LA's offer of a place at Oaklands
- 2 have not yet confirmed whether they will accept the offer a place at Oaklands or would like to apply for a place elsewhere.

The LA and Diocese maintain that Raine's would not be able to provide for efficient and appropriate education for such a small intake of pupils.

Parents can still take up the place in Year 7 at Raine's Foundation School for the 2019/20 academic. However, they have been made aware that there is a significant risk that the year group may be very small. If that proves to be the case, Raine's may exercise its management powers to provide the education for those children at the site of an alternative school, to enable them to receive a full curriculum.

3. Why is the LA instructing parents to seek alternative places now, if a decision has not yet been made?

Parents are not being "instructed" to do anything. The LA has informed parents of the plans for Raine's School to close in August 2020. A substantial number, particularly those parents of children in Year 9, have applied for other schools as they want to be certain that their child will be able to complete their GCSE studies at the same school. Parents of children in Year 10 have been advised to apply for a 6th form place at an alternative school for September 2020, given that the proposal is for Raine's to close at the end their child's Year 11.

4. Will there be a year 10 from September?

There are plans for there to be Year 10 at Raine's for September, but the number of pupils remaining in this year group will very much depend on how many parents decide to apply for places at schools elsewhere.

5. Where are Raine's 6th form pupils going to go?

Pupils in Year 12 will be able to continue at Raine's in Year 13. Pupils currently in Year 11, that were offered a place in the Raine's 6th Form, have been made aware that there is a significant risk that the year group may be very small. If that proves to be the case, Raine's may exercise its management powers to provide the education for those children at the site of an alternative school, to enable them to receive a full curriculum.

6. Why is Oaklands School presented as the only option?

The proposal includes plans for Oaklands School to be expanded to ensure that existing Raine's pupils are able to transfer to an alternative school nearby. However, it is not being presented as the only option. Parents may also apply for places at alternative schools, including nearby faith schools.

7. Why are parents being referred to schools out of the borough?

The consultation document provides information on other Church of England Schools, both in Tower Hamlets and its surrounding boroughs. This is so that parents, both now and in the future, can seek to secure a place at a Church of England School should they consider the options amongst the other Tower Hamlets unsuitable. Depending on where families live, their nearest appropriate alternative school may be outside Tower Hamlets.

8. Why are there no options to send Raine's pupils to a faith school?

There are options for parents to apply for faith schools in Tower Hamlets and in neighbouring boroughs. The London Diocesan Board, the Diocese responsible for Church of England Schools in this area of London, has made special arrangements for Raine's pupils at nearby Urswick School in Hackney. Raine's pupils who meet the Urswick Church admissions requirements will be placed at the top of the school's waiting list.

9. How is the LA increasing parental choice?

The LA is increasing parental choice by providing additional places at Oaklands and other nearby schools that would otherwise be full. Raine's has not been full for a number of years and it is therefore evident that it is no longer a popular choice for parents in Tower Hamlets and surrounding areas.

10. How many students are on roll at Raines?

There were 388 pupils on roll in Years 7 to 11 at the last census in Jan. The current number is 372 (Years 7 to 11).

11. When will the next parents' meeting take place?

Parents who have concerns about their children's education can approach their school or the local authority at any time. If, following this consultation, it is decided to go ahead with these plans a further meeting will be called at the end of the autumn term to hear representations about the "statutory proposals" which will have to be published at that time.

12. Will pupils get special dispensation for examinations due to the unrest?

The circumstances in which students can be given special consideration for exams are limited. Ultimately it is for the examination board to decide whether a dispensation can be given in each individual case. The LA is therefore reviewing whether the situation at Raine's falls within the guidelines agreed by all of the exam boards. Students and their families will be notified as soon as possible.

13. The LA claims it did 'all it could to publicise the school', including the new building, but parents have never seen any evidence of this (i.e. adverts on buses, etc)

The LA has said that it has been supporting Raine's with its efforts to increase its pupil intake over a number of years. This work has included;

- developing scholarship programmes in Modern Foreign Languages and Sports Studies;
- rewriting the school's admissions policy to encourage applications from children from all world faiths;
- enabling the school to adopt the LA's arrangements for pupil banding to support its efforts to achieve a balanced ability intake;
- appointing the Raine's headteacher to the Tower Hamlets School Admissions Forum; and
- reserving places at Raine's for pupils who were unsuccessful in securing places at any of the preferred schools at secondary transfer.

The Raine's school leaders during this period would have had the responsibility to consider how best to publicise and promote the school, alongside the support provided by the LA.

14. Who are the 'other communities' referred to in the consultation document; surely we are all one community?

The phrase 'other communities' is not used in the consultation document. The consultation describes the expansion of Oaklands as being beneficial as it provides all members of the community equal opportunity to access a high quality local school provision. Oaklands GCSE results have consistently been amongst the best in the borough.

15. Why has £17m been spent on renovating Raine's Lower Site, when this could have been spent on promoting the school?

£4m is the figure that has been allocated to be spent on renovating the Raine's Lower Site. This money is limited to 'capital expenditure' and can therefore only be used for renovating the school building and its landscape.

16. Given the money being spent on Raine's School building – why is it now being closed?

Money was invested in all secondary schools in the Borough to ensure that each school could provide great facilities for pupils. Raine's Foundation School envisaged that modern facilities would help with its recruitment of pupils. This has not proven to be the case.

Should Raine's School close the building at Approach Road will cease to operate as a secondary school. However, there will still be the opportunity for the building to be put to use for other education or community provision. This will be a matter for consideration by the Raine's Foundation Charitable Trust, the owner of the Approach Road site.

The LA and Diocese plan to bring the Raine's building at Old Bethnal Green Road back into use as a 6th Form provision for Oakland's School. This will benefit children at Oaklands and also those Raine's students who will be moving to Oaklands.

17. What would happen if Oaklands can't use the Lower Site?

The planned use of the lower school site is separate to the proposal to close Raine's. The LA would want to make the site a sixth form centre for Oaklands School, regardless of whether or not Raine's School closes.

The building has been empty for some considerable time and the opportunity provided by Oaklands is the most viable option for the building to be put to good use at this time.

18. What are the plans if these proposals do not go ahead?

The current proposal is to close Raine's and expand Oaklands. If it does not go ahead the LA would still need to find a way to solve the problem regarding the school's current financial position. Currently there appears to be no reasonable prospect of recovery for this school. A substantial increase in pupil numbers at this stage is unlikely to secure Raine's future as it would still not generate the level of income required to address the school's funding shortfall, repay its increasing licensed deficit and thereby enable it to reach a financially sustainable position. If Oaklands is not expanded the LA would have to consider how the overall need for school places in the borough is to be met.

19. What pastoral support for the wellbeing of pupils affected by this process is in place?

On an individual level the school has highly experienced staff team who are well aware of the sensitivities around the proposals and the effect that might have on students. Where staff feel students are finding it difficult to cope or are exhibiting behaviours that might stem from school anxiety, they are on hand to intervene on

an individual level- that might involve speaking to students, withdrawing them from certain activities, communicating with parents. On a group or cohort level, the school has prioritised the needs of different year groups. The school has held surgery appointments with all families and looked to support them to transitioning to schools of their preference. The school is planning different sets of activities for different groups of students depending on need. For example, many of the families with students in Year 9 have decided that a school move now would be preferable to waiting till next year. Therefore, as many of the year group are leaving in July, a two week transition project called 'New Horizons' has been organised to positively mark their end of time at Raine's and help them move on positively to their next school.

20. Why has the Trust not been approached regarding keeping the name of Henry Raine alive?

The LA is aware of the importance of keeping the name of Henry Raine alive in the borough. A commitment was made to the chair of the Foundation Trust in correspondence on the 7th of May 2019 to discuss further ways in which the legacy and name of Raine's is preserved in the borough of Tower Hamlets.

21. Why was the LA not involving parents at an earlier stage?

It is the responsibility of the governing body to keep parents and carers up to date with developments in the school. The school had kept parents informed of key developments including when the school received the 'Requires Improvement' judgement from Ofsted in 2017 and when an IEB had been appointed. When the IEB took over governance of Raine's in late October 2018, the school was in urgent need of improvement, having suffered from a legacy of weak leadership and governance, poor performance, falling rolls and mounting debt. Two meetings were organised to give parents an opportunity to meet with IEB members and ask questions.

Subsequently, the LA carried out a feasibility study and following the recommendations from this study it was agreed to move forward with the consultation to close Raine's. Parents were involved at the earliest opportunity. A letter was sent to parents on the 1st May 2019 and a parents meeting was subsequently held, followed by surgeries which are taking place every week so that parents can discuss their own circumstances with representatives from the LA.

22. Abuse (racial and religious) was received by Raine's students during a recent visit to Oaklands from Oaklands students, how will this be managed moving forwards?

First and foremost, the Senior Leadership Team, IEB and the Governing Body at both schools will not tolerate any type of abusive behaviour in their schools whatsoever. Very clear and robust action was taken against the poor behaviour during the recent visit, and sanctions were put in place to manage this. Every single family involved came in to meet senior staff and the Executive Headteacher and every single family was apologetic on behalf of their child and supportive of the school's actions.

Although the behaviour emanated from a group of Year 9 boys, strong and clear messages were communicated to the entire school community. Both schools are well aware of the different demographics of the two school communities. Therefore, we are all united and absolutely clear that the underlying principles in any potential joint venture or activity moving forward, should be tolerance, respect and cooperation. An organisation called a 'New Direction' who have worked in Tower Hamlets Schools previously are developing a programme of activities for pupils to help build relationships between the two schools. Raine's and Oaklands Schools have set up a joint group to oversee the progress and arrange for any further transition support if required.

23. It is the job of the LA to ensure that schools do not fail – why did the support provided not work at Raine's?

The LA was working with the school and various methods of support were provided. Below is a list of the key support:

- External support from Teaching Schools and specialist consultants
- External review of key aspects of the school i.e. Maths and Behaviour management
- Peer to Peer Support
- Support from Pupil Admissions
- Support with developing the school building to attract more pupils

Legally, the running of the school is the responsibility of the governing body. In 2017-18 a 'collegiate' package of support was agreed for Raine's school, however the school leadership did not fully engage with the support and this did not have the desired outcome. For the academic year 2018-19, the LA agreed with the Diocese there needed to be an executive headteacher in the school who would make full use of the support available. As the governing body had not taken the steps they needed to in order to improve the school in previous years, the LA identified that formal intervention was required and an Interim Executive Board (IEB) was put in place to ensure the governance also improved.

The IEB and school leaders have invested significant time, effort and determination to improve the performance at Raine's. The changes brought about in the school were noted as positive in the Ofsted monitoring visit undertaken in December 2018. However, at this time parents had already made their choice of secondary school place. Only 29 pupils applied to Raine's as their first preference for entry to Year 7 in September 2019.

24. What happened to HT Paul Woods?

It was initially agreed for Paul Woods to support the school on an interim basis. Paul Woods had approached the LA in December 2018 about returning to lead his own school, Sir John Cass, on a full time basis and confirmed to the LA that he would not be staying beyond Easter 2019. The LA would have preferred him to continue, but we are mindful that Mr Woods' first responsibility is to his own school. The LA then considered other local schools with leadership capacity to support a school which required improvement and subsequently approached Oaklands.

25. Parents are disappointed with mixed messages received, Paul Wood communicated that the school was doing well – what happened?

Rapid progress was made in the autumn term. Behaviour had improved notably and teaching became more effective. This was recognised by Ofsted at a monitoring visit in December and further improvements have been made since. However, from the start the IEB was clear that even if the school improved significantly, its future would still be at risk. This is because the school's long-term decline had resulted in a continually decreasing number of pupils on roll. (Currently there are 372 students in Years 7 to 11, making the school less than half full). This in turn had led to the school being in considerable and increasing debt.

26. Has the Executive Headteacher been brought in to close the school?

No. The LA approached the leadership team at Oaklands after Mr Paul Woods indicated he wanted to return to Sir John Cass to provide the required leadership for the school. Raine's needed a school improvement partner and as a high performing local school, Oaklands was well placed to support. Mr Paul Woods left in Easter and Patrice Canavan became Executive from the 1st day of the summer term as a direct replacement with same brief.

27. Who put the IEB in place?

The LA applied to the Secretary of State to put an IEB in place to improve the governance of the school following the correct statutory procedure. The DfE agreed

the members suggested by the LA, but not the nomination made by the Foundation Trust. The IEB was established on 29th October 2018.

28. What has the school done to prevent the school's closure?

See question 13 and question 23.

29. Why are there no options to send Raine's Pupils to faith schools

There are several other faith schools in LBTH and neighbouring boroughs and parents are at liberty to seek a place at any of these schools. If a place is initially refused they have a statutory right to ask an independent appeal committee to grant a place on the grounds that it is justified by the special circumstances even if the school is technically full. The LDBS has made arrangements with The Urswick School in Hackney that any pupil at Raine's who meets the Church admissions requirements for the Urswick School will go to the top of the waiting list.

30. Why was the option of Academisation of Raines initially explored in 2015 not taken forwards?

The previous Governing Body had considered Academisation however this was not taken forward. An application to convert to an academy must be made by a school's Governing Body; but the final decision is in the hands of the DfE

31. Parents are very concerned about the approach of the LA in terms of communicating plans to parents i.e. parents found out about the plans leaked on social media – can you explain this?

This was unfortunate. LA officers did work on carefully managing the communications so that the school community would be the first to be informed of proposals. The Council's Cabinet decision making process and work plan is agreed well in advance. Following on from the feasibility study and proposed recommendation the Cabinet's work plan had to be updated to include a possible decision on Raine's closure in the future. This was an administrative process. The work plan was available on Tower Hamlet's website and was subsequently leaked on social media.

32. Why is the Trust not involved in the IEB?

The IEB is established in conjunction with the Regional Schools Commissioner and with the permission of the Secretary of State for Education. Members of the IEB have to be approved by the Secretary of State. The LA had asked the Raine's Foundation Trust to nominate a Trustee to join the IEB, however the nomination provided was rejected by the Secretary of State. The letter from the Regional Schools Commissioner rejecting the nomination was forwarded to the Foundation Trust. There was no further nomination received from the Trust.

33. Why is the Trust not involved in the Joint Steering Group?

The Steering Group is a joint steering group with representatives from both schools including parents, governors and staff. The Steering Group is not a decision making body and is a useful forum to have open discussion affecting pupils, parents and staff.

The Trust has been kept informed directly.

34. Why have 3 different Headteachers been in place over a period of 3 years?

There was a need to strengthen the leadership of the school following the outcome of the Ofsted Inspection (second 'Requires Improvement' Judgement).

Paul Woods was brought in on an interim basis as an Executive Headteacher to increase the leadership capacity.

Rob Hullet (Headteacher) left the school in December 2018.

Paul Woods left the school at the end of the spring term (Easter) and Patrice

Canavan was then brought in by the LA as the Executive Headteacher to continue

to provide the leadership the school required.

35. When did the Interim Head join the school?

The Interim Headteacher worked alongside the school in March 2019 as part of the handover from Paul Woods and formally took up the Headship (on an interim basis) from April 2019.

36. Why were there no parent governors on Raines GB since 2016?

The Governing Body at the time attempted to recruit parent governors on a number of occasions without success.

37. Did the LA put the second GB in place?

The second Governing Body was put in place by the Diocese as the school is a faith school. The Chair of Governors nominated by the Diocese, Ms Liz Wolverson, is Chief Executive of the LBDS Academies Trust.

38. What can parents do to stop the school from closing? Parents want to be involved.

In reaching this stage the LA, along with the IEB and Diocese, have explored a number of alternative options to maintain the school, but none have proven to be feasible. The consultation document provides details of the alternative options explored and the reasons why these are not considered to be possible and all interested parties are encouraged to read this document.

The LA welcomes views and opinions from parents on other potential options to secure the future of Raine's and/or its pupils and all interested parties are invited to submit responses via the online feedback form, by post or by email.

39. Where has the consultation been publicised?

The consultation has been publicised on:

LA consultations website
Raines Foundation School website
Oaklands Secondary School website
LA social media accounts

And with the following agencies:

Local MPs
Tower Hamlets Cabinet Members
Raines Foundation Trustees
Local School Governors
Tower Hamlets Admissions Forum Members
Tower Hamlets Head Teachers
Neighbouring Local Authorities
Tower Hamlets Parents & Carers Forum
Tower Hamlets Young Peoples Forum
Church of England Diocese
Roman Catholic Diocese
Somali Community Association
Collective of Bangladeshi Governors
East London National Education Union
Tower Hamlets Council of Mosques

40. Shouldn't all parents receive funding for new school uniforms?

Yes, uniform grants will be provided for parents to purchase a new school uniform when this is required.

On 5th July 2019 the LA's School Admissions Team will write to every Raine's parent who has applied for a transfer to another school for this September, to confirm the offer of a school place. The letter will include a section about how they can claim financial support with buying their new school's uniform.

The uniform grant will be in line with the current school clothing grant that is provided for children when they transfer from primary to secondary school, which is currently £110. The grant will only be redeemable at Khalsa Schoolwear (388 Bethnal Green Road, E2 0AH) Parents will need to present the letter when they visit the store, along with identification, to claim the grant.

More information can be obtained from the LA's School Admissions Team.

41. How will this proposal affect Oaklands School? There will be more students – will there be more staff?

There will be a need to increase staffing at Oaklands School. A larger school will offer more opportunities for their professional development.

42. How are you going to ensure faith / Christianity at Oaklands?

All schools must by law provide Religious Education (RE) as part of the curriculum and make provision for collective worship. If Raine's closes LDBS will work closely with Oaklands to ensure that transferring students receive high quality RE and are supported in their spiritual development. Detailed discussions with Oaklands School won't begin until a decision is taken that Raine's is going to close as the LDBS is not pre-judging the outcome of the consultation.

43. Why is LDBS not fighting to keep a faith school open?

LDBS has spent the past five years trying to help the school to recruit pupils but that has been unsuccessful. Unless sufficient pupils are on roll for the school to break even financially, the decision on whether a school stays open or closes is taken by those providing the funding.

44. Why have pupil numbers declined?

The school was inspected in 2015 and then re-inspected in 2017 and was judged to 'Require Improvement' as a result of both visits. Pupil numbers, which were already declining in 2016, were further affected by poor GCSE results that year, as well as attendance and behaviour issues in the school.

The school's current roll and projected numbers demonstrate that it is highly unlikely to recruit the pupil numbers necessary to address its current funding shortfall, repay the loans it has already been given and move onto a financially sustainable footing.

45. Information received by parents was not consistent – i.e. some did not receive the text message about the meeting.

A link to the council's consultation web page was published on the websites of Raine's and Oakland's Schools and both schools sent out a text message to parents by 17th June directing them to the link, which clearly states information about the public meeting at Oaklands on 19th June and at Raine's on the 26th June. It is possible that technical issues (either on sending or receipt) could have prevented messages getting through in individual cases; but the intention was to inform everyone at the same time.

46. Why is Raines being closed?

At this stage no decision on the closure of Raine's has been made, and all the views received, either at the meetings or separately in writing, will be considered prior to a decision being taken as to whether to go ahead with the proposal.

47. Has the amalgamation already been agreed?

Please see answer above. Technically a complete amalgamation of the two schools is not being proposed. There is a proposal to enlarge Oaklands so that it can accommodate any pupils displaced as a result of the possible closure of Raine's who wish to transfer. This is designed to help children to transfer together and to minimise disruption to their education by ensuring as much continuity of curriculum

and teaching as possible. However parents can exercise their right to seek a place in a different school if they prefer, and will be given every assistance.

48. What is the purpose of this meeting?

Two public meetings have been arranged to provide an opportunity for parents, staff, pupils and members of the local community to ask questions and express their views on the proposals outlined in the consultation document. Another aim of these meetings is to publicise the consultation document, which provides detailed background information on the context and background to the proposal, including options already explored.

49. What will this forum achieve?

Please see answer above.

50. Is this whole process being recorded

Minutes will be produced at each public meeting which will give an overview of discussions and topics covered. A list of all questions raised at both meetings will be produced with answers. This will be published as a list of Frequently Asked Questions (FAQs) on the LA's consultation web page. The slides used at each of the public meetings will also be available to view online at the same location.

51. Will there be an opportunity to discuss these issues further?

A further public meeting will take place at Raines Foundation School on Wednesday 26th June at 6pm.

Parents who have concerns about their children's education can approach their school or the local authority at any time. If, following this consultation, it is decided to go ahead with these plans a further meeting will be called at the end of the autumn term to hear representations about the "statutory proposals" which will have to be published at that time.

52. Is this meeting a 'tick box' exercise?

No, at this stage no decisions on the closure of Raine's or the expansion of Oaklands School has been made and the public meetings provide an opportunity for parents, staff, the Raines Foundation Trust, pupils and members of the local community to ask questions and express their views on the proposals outlined in the consultation document. All the views received, either at the meetings or separately in writing, will be considered prior to a decision being taken as to whether to go ahead with the proposal.

53. Should staff be involved in keeping the school open?

Raine's staff and school leaders would have had the responsibility to work alongside the LA as part of the support package being delivered in order to raise standards at the school. Please see question 13 for further details on the support that was provided by the LA.

This page is intentionally left blank



Department
for Education

Department for Education
Sanctuary Buildings
20 Great Smith Street
London SW1P 3BT

Tel: 0370 000 2288

Email enquiry form:

www.education.gov.uk/help/contactus

Ms Carole Day
Chair of Governors
Raine's Foundation School
Approach Road
Bethnal Green
London
E2 9LY

10 January 2014

Dear Ms Carole Day,

Following the application of the governing body to convert Raine's Foundation School to academy status, I am writing to let you know that after careful consideration, we have decided not to enter into a funding agreement with the school until the provisional 2014 KS4 results are available.

In reaching this decision we looked at the examination results, rates of progress and the school's last Ofsted report. The attainment results in 2013 were below the national average despite Ofsted rating the school as 'good with outstanding features' in December 2011.

I am aware that your new head teacher, John Bradshaw, has joined the school from January 2014 and I have asked your project lead, Martin Rowley, to contact you early in March to confirm your predicted 2014 KS4 attainment. If the provisional results are as predicted, I would be happy to re-consider this decision.

I know this will be disappointing news. However, as you will appreciate, we need to be assured that schools that convert as a stand-alone academy fully meet the 'performing-well' criteria we have established for successful conversion.

I am copying this letter to John Bradshaw, Inigo Woolf at the Diocese and to Kate Bingham at Tower Hamlets Local Authority.

Yours sincerely

DOMINIC HERRINGTON
Director, Academies Group

This page is intentionally left blank

Raine's Foundation School

Approach Road, Bethnal Green, London E2 9LY

Inspection dates	10–11 November 2015
Overall effectiveness	Requires improvement
Effectiveness of leadership and management	Requires improvement
Quality of teaching, learning and assessment	Requires improvement
Personal development, behaviour and welfare	Requires improvement
Outcomes for pupils	Requires improvement
16 to 19 study programmes	Good
Overall effectiveness at previous inspection	Good

Summary of key findings for parents and pupils

This is a school that requires improvement

- The governing body does not provide effective challenge to leaders and does not hold them to account sufficiently well. Records of their meetings lack appropriate focus, strategy and detail.
- Leaders have not focused enough on improving the quality and consistency of teaching, learning and assessment. This means outcomes for pupils have not improved rapidly enough.
- Leaders' monitoring and evaluation lacks structure, detail and sufficient rigour. As a result, leaders are sometimes uncertain about the impact of different actions. This hampers the pace of improvement at the school.
- The most recent academic outcomes, and information about current year groups, show improvement in different areas. Nonetheless, the progress of disadvantaged pupils in some key subjects lags behind that of other pupils in the school and nationally.
- The expectation from teachers about the quality and quantity of work within lessons is highly variable. This leads to pupils sometimes having a lack of engagement and pride in their work, and has a negative impact on their learning.

The school has the following strengths

- The sixth form is good. Strong and effective leadership in this area means teaching over time is effective in securing good outcomes for pupils. Meaningful information and honest advice and guidance means that pupils select courses appropriate to their need, ability and aspiration.
- Since his appointment, the headteacher has made many positive changes to the school. He is ambitious for, and realistic about, the future direction of the school.
- Pupils are quick to settle in lessons and their behaviour and attendance have improved over time. They are well cared for and have a sound understanding about how to keep themselves safe in modern society.
- The school works well with other agencies to ensure the appropriate care and support of vulnerable pupils. This is well managed and tracked.

Full report

What does the school need to do to improve further?

- Improve leadership and management and raise outcomes rapidly by:
 - ensuring that the governing body has the appropriate skills, knowledge and structure to support, challenge and hold leaders of the school to account effectively
 - improving systems for monitoring, review and evaluation to ensure a sharp and clear understanding of the impact of actions on outcomes
 - ensuring routine and systematic analysis and evaluation of gaps in the achievement of disadvantaged pupils in comparison to their peers and all other pupils nationally, so that they narrow rapidly over time.
- Improve teaching, learning and assessment, and outcomes, and provide greater consistency in lessons by ensuring that:
 - all staff have high expectations of the quality and quantity of work to be produced in lessons so that pupils take greater pride in their work and are challenged to develop and deepen their learning
 - monitoring within lessons is such that pupils are engaged in, and take ownership of, their learning
 - all staff provide pupils with constructive and meaningful feedback in line with school policy to secure and extend their learning.

An external review of governance should be undertaken in order to assess how this aspect of leadership and management may be improved.

Inspection judgements

Effectiveness of leadership and management requires improvement

- Leadership and management require improvement because leaders have not placed sufficient urgency on improving the standard of teaching, learning and assessment. This means that outcomes have not improved rapidly enough. They do not systematically compare the performance of disadvantaged pupils in the school to all other pupils nationally.
 - The evaluation of pupil premium expenditure lacks detail. Leaders can cite the many areas and interventions on where the school is spending the additional funding, but are less confident in gauging the impact of these actions. This means that the effectiveness of the various strategies is unclear. Some strategies are having a positive impact on reducing gaps, for example in mathematics, but others are not. Gaps are not closing quickly enough throughout the school.
 - Leaders monitor the quality of teaching in a structured way, but too often focus on the management of behaviour within lessons rather than on learning and progress. This means that outcomes have not improved rapidly and vary between different subject areas. The information gleaned by leaders from lessons and scrutiny of pupils' work links to staff training. Leaders are correct in their view that the inconsistent implementation of new practices across the school has hindered the impact of this training. Leaders do not shy away from tackling specific cases of weak teaching and have a detailed process for managing teachers' performance. This means that teaching is improving steadily but significant inconsistency remains across the school.
 - New systems and structures for assessment help leaders to track pupils' performance. This is a significant development at the school. However, some aspects require continued refinement and further improvement. A range of mechanisms and approaches exist to the setting of targets in the school, but there is a disconnect between pupil-level targets, department-level targets and those of the whole school. This lack of coherence and clarity means that the future growth of the school is not defined clearly.
 - Since his appointment in January 2014, the headteacher has made a number of positive changes to the school including the introduction of new and improved systems for monitoring behaviour, assessment and attendance. These changes are having a positive impact. Levels of attendance continue to improve and are now broadly in line with the national average. Levels of persistent absence are now below those nationally.
 - The curriculum of the school is appropriate for the needs of the cohort. It is under constant review to ensure that it is broad and balanced. Leaders are right in their rationale behind plans to remove particular vocational courses in favour of more academic-focused ones in order to increase the level of challenge. An increasing and significant number of pupils take up a foreign language at Key Stage 4.
 - A wide range of other activities supports the academic curriculum well. These include the number of clubs and trips. The school is right to be proud of its basketball and table tennis provision, and of the significant number of pupils engaged in the Duke of Edinburgh award scheme.
 - Levels of care and support for vulnerable pupils or those who are disabled or have special educational needs are effective. Frequent engagement with a wide range of professionals and careful monitoring lead to well-coordinated provision. The establishment of a 'behaviour support assistant' has been successful and the attendance and behaviour of some of the school's most vulnerable pupils have improved significantly. Leaders are right in their view that the next stage of development in this area is to have a greater focus on outcomes and on ensuring continuity of learning.
- **The governance of the school**
- Governors are complimentary of the headteacher and the many changes he has made to the school since his appointment. They recognise the school is improving, but are less definite about whether the rate of change meets their expectations.
 - The governing body has recently agreed to consult on an open admissions policy for the school. They are justified in their belief that an open admissions policy will increase numbers in the school.
 - Governors do not hold leaders of the school to account sufficiently well. The poor planning and lack of focused approach to their meetings mean that governors do not routinely discuss key aspects of the school, including teaching, learning, achievement and the performance of key groups, including disadvantaged pupils. Records of meetings, although lengthy, lack relevance, detail and clarity.
 - Reviews of policies are cursory: governors do not evaluate the effectiveness of current practice and consider how it might be improved. This means that some policies of the school lack substance, meaning and worth.

- Governors' views about the future development of the school lack precision. For example, they are unclear and uncertain about what outcomes in three years' time might be. This lack of detailed consideration limits the rate of development at the school.
- The arrangements for safeguarding are effective. Pupils can describe clearly the actions of the school in helping them to keep themselves safe. They are aware of the risks in modern society such as the dangers of extremism and radicalisation, forced marriage, domestic violence and female genital mutilation. The school has utilised support from the local authority and the diocese to aid this, and it engages fully with the 'Prevent' strategy.

Quality of teaching, learning and assessment requires improvement

- The quality of teaching, learning and assessment requires improvement because significant inconsistency and variation exist in subject areas and between the different key stages of the school.
- Teachers' expectations about the quality of work, and the quantity of work pupils are expected to complete, is variable. Low expectations mean that pupils do not take pride in their work: presentation is sometimes very poor and work is disorganised. This renders consolidation of learning difficult and has a negative impact on the progress pupils make.
- The level of challenge within lessons is often not high enough. This has a marked and adverse impact on the progress of the most-able pupils. Too often, there are not enough opportunities for pupils to think for themselves. As a result, they do not develop a deep and conceptual understanding.
- Teachers' feedback to pupils is inconsistent. Written feedback from teachers is frequently superficial and not in line with school policy. Teachers do not always identify pupils' misconceptions, and sometimes incorrect responses from pupils are marked as correct. This has an obvious negative impact on learning and progress.
- Assessment of pupils' work is not always accurate. On occasion, teachers assess work as being at a higher level than it actually is. Such inaccuracies within individual subject areas lead to overprediction at a whole-school level. Close scrutiny of English and mathematics means that teacher assessment is much more precise than in other areas. Leaders recognise the need for improvement in this aspect of teaching and have appropriate plans, including working with other schools, to address this.
- Literacy is more developed than numeracy. Many lessons help to support basic literacy well, for example by having a clear focus on subject-specific terminology. However, there are limited opportunities for pupils to develop their extended writing.
- Where teaching is strongest over time, most notably in Key Stage 5, teachers' subject knowledge, planning and questioning mean that pupils develop their skills, knowledge and understanding well. The climate for learning is such that teachers readily challenge pupils to develop their own thinking, and use assessment skilfully to evaluate understanding rather than evidence recall. Pupils are clear about how well they are doing and know what specific aspects they need to work on in order to improve.

Personal development, behaviour and welfare requires improvement

Personal development and welfare

- The school's work to promote pupils' personal development and welfare requires improvement.
- In lessons, pupils settle quickly and the atmosphere in lessons is calm. However, pupils' attitudes to their learning are not always positive. Some pupils do not engage in their learning enough: they do not apply themselves fully and some quietly ignore what they are required to do. Leaders have correctly identified the need to improve the climate for learning.
- Relationships around the school are, in general, positive. Pupils are appreciative of the support and care they receive from staff. The many different cultural and ethnic groups in the school are respectful of each other and mix well.
- Attendance has improved steadily over recent years and current information indicates that it is broadly in line with the national average. Leaders have worked diligently to reduce the level of persistent absence and it is now below that nationally.
- The school has an appropriate and detailed programme to support pupils' spiritual, moral, social and cultural development. Leaders recognise the need to embed this plan more fully across the school. The Key Stage 3 curriculum includes a weekly lesson of 'preparation for adult life'. This covers a wide range of topics that are designed to contribute to the overall well-being of pupils. Pupils are encouraged to reflect on the weekly 'thought for the week' and the school chaplain helps promote Christian values. Trips

abroad, for example to Palestine, are effective in developing their cultural and moral awareness of the world around them. These, together with other activities, mean that the school prepares pupils well for life in modern Britain.

Behaviour

- The behaviour of pupils requires improvement.
- Pupils say that while behaviour has improved there is still some bullying in the school. The responses to the Parent View and staff questionnaires, although small in number, corroborate this view. Pupils feel more confident now than in the past that the school will deal effectively with such issues, but sense that some bullying often goes unreported and unnoticed.
- Around school, the large majority of pupils conduct themselves well. However, some display a lack of maturity and pride towards their appearance and their education. The school environment is well maintained, although the lower site lacks the vibrancy of its opposite. The school has refined how it manages pupils' behaviour with an increasing emphasis on rewarding pupils for positive conduct rather than constantly applying sanctions. This is having a positive effect: behaviour continues to improve. Detailed recording of events enables the school to track incidents by type, pupil group and cohorts. Levels of fixed-term exclusions have reduced significantly over the last two years and there is less disruption to lessons. The school recognises the need to use the information on behaviour effectively to secure improvement in teaching and related outcomes.

Outcomes for pupils

require improvement

- Outcomes for pupils require improvement because the progress of some groups, including disadvantaged pupils, in key subject areas lags behind that of other pupils in the school and other pupils nationally.
- The provisional GCSE results for 2015 show that a number of key indicators, including the proportion of pupils achieving five or more GCSEs at grade C or above including English and mathematics, improved in comparison to the previous year. Levels of progress in the majority of subjects have improved and attainment is now in line with that nationally. However, while the performance in mathematics has improved by some margin, achievement in English has declined by a similar degree. Progress in both subjects is below the national average.
- Analysis of provisional and historic assessment information shows that the gap in the progress of disadvantaged pupils in mathematics in comparison to non-disadvantaged pupils nationally closed significantly in 2015. Assessment information about current year groups indicates that this gap will disappear in the future. In English, the trend is less positive: significant gaps in progress exist, and these are not closing quickly enough.
- The performance of other groups, such as those who are disabled, have special educational needs or belong to different ethnic groups, is variable. This is because although leaders gather a wealth of information on the achievement of these different groups of pupils, they do not identify patterns or trends sufficiently well.
- Information, advice and guidance relating to future careers or education are effective. A structured approach helps pupils to identify future pathways appropriate to their aspirations. Strong partnerships with business and commerce provide pupils with valuable experience and insight into the world of work. This means that the overwhelming majority progress into education, employment or training.

16 to 19 study programmes

are good

- Leadership and management of the sixth form are highly effective. Leaders monitor and analyse assessment information in a clear and succinct way. The school's evaluation of the sixth form is accurate: leaders know which subject areas need to improve and have appropriate strategies in place to improve them.
- The curriculum covers a wide range of academic subjects and an increasing number of vocational courses that meet the needs of individuals well. It has grown in size steadily since the last inspection and rates of retention are stable, with the large majority of pupils continuing into Year 13.
- Strong subject knowledge of staff coupled with high expectations underpins effective teaching in the sixth form. Planning develops analytical skills, and encourages pupils to synthesise information. Pupils value the frequent assessment and feedback from teachers, and they are clear about what they need to do to develop their learning further.

- Historical information about outcomes in the sixth form shows positive progress. Achievement in vocational courses is particularly strong. The provisional assessment information for 2015 indicates a slight fall in levels of achievement in academic subjects. These are now broadly in line with national averages. This provisional information also shows gaps in the performance of disadvantaged pupils in relation to their peers to be marginal and limited only to the academic courses: there are no gaps in the vocational part of the curriculum. At A level, English literature and mathematics are both popular and perform equally well. A very small number of pupils retake GCSE English or mathematics. Success rates in English are significantly stronger than in mathematics. The school has identified the need to eradicate this inconsistency and has now tripled the curriculum time for the teaching of GCSE mathematics in the sixth form.
- A broad range of activities is effective in preparing pupils for the next steps in their education or careers. Detailed guidance on higher education means the very large majority of the sixth form go on to university, and the 'think forward' programme is successful in ensuring that all other pupils progress into employment or training. This year, the school aims to expand its programme of work experience to include all Year 12 pupils.
- Pupils speak highly of the support they receive from the school and individual teachers. They value the wide range of activities available to them, including those related to sport and the arts. They link the relatively small size of the sixth form to the personalised support and care they receive. They can readily identify risk and know how to keep themselves safe.

School details

Unique reference number	100979
Local authority	Tower Hamlets
Inspection number	10005682

This inspection was carried out under section 8 of the Education Act 2005. The inspection was also deemed a section 5 inspection under the same Act.

Type of school	Secondary
School category	Voluntary aided
Age range of pupils	11–18
Gender of pupils	Mixed
Gender of pupils in 16 to 19 study programmes	Mixed
Number of pupils on the school roll	674
Of which, number on roll in 16 to 19 study programmes	163
Appropriate authority	The governing body
Chair	Miss Carole Day
Headteacher	Mr John Bradshaw
Telephone number	020 8981 1231
Website	http://rainesfoundation.org.uk
Email address	success@rainesfoundation.org.uk
Date of previous inspection	17–18 November 2011

Information about this school

- Raine’s Foundation School is a voluntary-aided Church of England school, in the Diocese of London. The school is split across two sites in Bethnal Green. The smaller of the two sites caters for pupils in Years 7 and 8 only.
- The school is smaller than the national average.
- More than half of the pupils are from a range of different ethnic backgrounds and cultural heritages, and the proportion who do not have English as their first language is well above the national figure.
- The proportion of pupils who are disadvantaged is above the national average.
- The proportion of pupils identified as being disabled, or with some sort of special educational need, is in line with the national average.
- The school does not use any alternative provision.
- The school meets the government’s floor targets. These set out the minimum expectations for pupils’ attainment and progress.

Information about this inspection

- Inspectors visited a wide range of lessons across all key stages. In total, 46 lessons were visited during the course of the inspection. Members of the school's leadership team joined a number of these visits to lessons.
- Inspectors spoke to a number of pupils, both formally and informally throughout the two days of inspection. They visited both sites and held a number of meetings with senior staff, middle leaders and other staff. Meetings were held with the governing body, and telephone conversations were held with both the diocese and the local authority.
- The inspection team scrutinised a range of documentation provided by the school including information linked to attendance, behaviour, teaching and learning, performance management, development plans and minutes of governing body meetings. They also evaluated the school's own assessment of its own performance.
- Inspectors considered the school's own survey of parents and a small number of responses to Parent View. They took account of 12 responses to a questionnaire for staff.

Inspection team

Sai Patel, lead inspector

Angela Corbett

Carmen Rodney

Kanwaljit Singh

Rosemarie McCarthy

Her Majesty's Inspector

Her Majesty's Inspector

Her Majesty's Inspector

Ofsted Inspector

Ofsted Inspector

Any complaints about the inspection or the report should be made following the procedures set out in the guidance 'Raising concerns and making a complaint about Ofsted', which is available from Ofsted's website: www.gov.uk/government/publications/complaints-about-ofsted. If you would like Ofsted to send you a copy of the guidance, please telephone 0300 123 4234, or email enquiries@ofsted.gov.uk.



You can use Parent View to give Ofsted your opinion on your child's school. Ofsted will use the information parents and carers provide when deciding which schools to inspect and when and as part of the inspection.

You can also use Parent View to find out what other parents and carers think about schools in England. You can visit www.parentview.ofsted.gov.uk, or look for the link on the main Ofsted website: www.gov.uk/government/organisations/ofsted

The Office for Standards in Education, Children's Services and Skills (Ofsted) regulates and inspects to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. It regulates and inspects childcare and children's social care, and inspects the Children and Family Court Advisory and Support Service (Cafcass), schools, colleges, initial teacher training, further education and skills, adult and community learning, and education and training in prisons and other secure establishments. It assesses council children's services, and inspects services for looked after children, safeguarding and child protection.

If you would like a copy of this document in a different format, such as large print or Braille, please telephone 0300 123 1231, or email enquiries@ofsted.gov.uk.

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence, write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

This publication is available at www.gov.uk/government/organisations/ofsted.

Interested in our work? You can subscribe to our monthly newsletter for more information and updates: <http://eepurl.com/iTrDn>.

Piccadilly Gate
Store Street
Manchester
M1 2WD

T: 0300 123 4234
Textphone: 0161 618 8524
E: enquiries@ofsted.gov.uk
W: www.ofsted.gov.uk

© Crown copyright 2015



This page is intentionally left blank

Raine's Foundation School

Approach Road, Bethnal Green, London E2 9LY

Inspection dates

17–18 October 2017

Overall effectiveness	Requires improvement
Effectiveness of leadership and management	Requires improvement
Quality of teaching, learning and assessment	Requires improvement
Personal development, behaviour and welfare	Good
Outcomes for pupils	Requires improvement
16 to 19 study programmes	Good
Overall effectiveness at previous inspection	Requires improvement

Summary of key findings for parents and pupils

This is a school that requires improvement

- A temporary headteacher has led the school for the last 18 months. This has resulted in a period of uncertainty for staff and parents. Governors appointed him as the permanent headteacher very recently.
- Since the last inspection, leaders have introduced considerable training for staff. However, the training has not been good enough to improve teaching. Overall, the lack of high-quality training for staff has resulted in teaching that requires improvement.
- Leaders, when they review teaching over time, do not monitor pupils' progress effectively. Some focus on teaching rather than pupils' learning. Leaders do not use external support effectively to help them check on the quality of teaching. Consequently, leaders are generous in their evaluations of teaching.
- Leaders focus too much on systems and processes. They do not evaluate the impact of their actions sharply enough. Consequently, the quality of teaching and learning has not improved to secure good outcomes for pupils.
- Pupils' outcomes in GCSE examinations are below national averages. Teaching, although improving now, has not been of the quality needed to ensure that pupils were able to make the progress that they should have.
- Leaders set targets for pupils which are not sufficiently challenging. As a result, teachers' expectations are not high enough. Some pupils, particularly the most able pupils, are not making the progress of which they are capable.
- Pupils have low literacy levels. Leaders are taking steps to improve literacy. However, many pupils find reading difficult so do not read for pleasure.

The school has the following strengths

- Pupils' behaviour is good. They behave well and most work hard during lessons.
- The headteacher has appointed new middle leaders. They are raising standards in their subject areas. For example, pupils' progress in mathematics is improving.
- Leadership of the sixth form is strong. Students make good progress overall because of the good teaching and support that they receive.
- Pupils' outcomes in public examinations are improving. Current pupils are making even better progress because there is effective teaching in different subject areas.

Full report

What does the school need to do to improve further?

- Governors should provide effective external support for the new headteacher in developing his strategic leadership.
- Leaders should improve pupils' outcomes by:
 - providing high-quality training for teachers so that they quickly improve their teaching
 - ensuring that they use external support effectively in checking their judgements of teaching
 - setting targets for pupils which are challenging, particularly for the most able
 - focusing on monitoring the quality of pupils' learning when they review the quality of teaching across the school
 - improving literacy across the school and establishing a culture of reading for all pupils, including those who are able to read fluently.

Inspection judgements

Effectiveness of leadership and management

Requires improvement

- Leaders' expectations of pupils' progress are not high enough. Consequently, the targets set for pupils are not ambitious. Teachers then ask pupils to complete tasks with varying degrees of difficulty based on these targets. Some pupils find the tasks set too easy. Therefore, pupils, particularly the most able pupils, are not making the progress of which they are capable.
- The governing body very recently appointed the temporary headteacher as permanent headteacher. Over the last 18 months, staff shared uncertainty about the stability of leadership at the school. Staff are confident that the headteacher will bring improvement to the school.
- Leaders have changed the curriculum to meet pupils' needs. All pupils now study a modern foreign language and a humanities subject in key stage 3. However, leaders do not evaluate the effectiveness of the new curriculum sharply enough. They do not review the way that the curriculum prepares pupils for further study in key stage 4 and the sixth form.
- Senior leaders, when they evaluate learning, focus on what the teacher is doing rather than the quality of pupils' learning. This results in an overgenerous assessment of the quality of teaching.
- The headteacher has introduced training for staff. He ensures that the training covers, for example, leading teams effectively and developing better teaching and learning. Teachers, including those who are new to teaching said that the training is helpful. However, teaching is inconsistent within and across departments because teachers have not embedded their training into their everyday teaching practice. Leaders are not fully assessing the impact of the training.
- There are new middle leaders in key roles. Middle leaders from other schools help to provide the training to support them in their leadership roles. Middle leaders are more effective because of this training. Standards in their subject areas are improving.
- Leaders focus too much on systems and processes. They do not evaluate the impact of these systems sharply enough. As a result, they do not have an accurate view of some aspects of the school's work, for example the overall quality of teaching.
- A new leader oversees support for pupils who have special educational needs (SEN) and/or disabilities and pupils who speak English as an additional language. The leader is using the funding for SEN more effectively. For example, new systems have been put in place to provide better support for pupils. However, the systems are not embedded in classroom practice.
- Leaders use pupil premium funding with increased effectiveness. Teachers support disadvantaged pupils in class and elsewhere in the school. Disadvantaged pupils currently in the school are making better progress than in previous years.
- The school uses the Year 7 catch-up funding well. Year 7 pupils are improving their reading and numeracy because of this support.
- The new headteacher holds staff to account for pupils' outcomes. There are secure

systems in place. Leaders now link staff salary progression to pupils' progress.

- There is a very wide range of extra-curricular activities. Pupils appreciate the opportunities available such as the basketball academy, debating society and external awards. Well-planned programmes provide opportunities for pupils' spiritual, moral, social and cultural development. All these opportunities support pupils in their personal development and in preparing them for life in modern Britain.

Governance of the school

- Since the last inspection, the governing body has completely changed. The diocese and the local authority appointed new governors. There is now a small team of experienced governors. They have a strong vision for the school as a community linked to the local church. Pupils' outcomes are improving. Therefore, a review of governance has not been recommended.
- Governors work hard to engage parents. They visit the school regularly and are present at all events with parents. They also communicate with parents through the school newsletter. Parents like the communication they receive.
- Governors provide regular support and challenge to leaders by:
 - meeting with senior and middle leaders to challenge poor outcomes in public examinations
 - bringing in external support to improve pupils' attendance
 - challenging leaders to improve teaching
 - supporting leaders in developing a balanced budget.

Safeguarding

- The arrangements for safeguarding are effective.
- There is a strong culture of safeguarding across the school. Parents and carers, staff and pupils all said that they feel safe in the school. There are many vulnerable pupils, and teachers employ extra vigilance to keep them safe, chasing up external support when pupils need this.
- All staff are aware of how to spot and report concerns about pupils' safety. Pupils understand how to keep themselves safe, particularly from local risks such as extremism.
- Leaders carry out the statutory checks before they employ staff in the school. There is regular training for staff. Several senior staff have appropriate qualifications in safeguarding. Training for all staff includes information on dealing with bullying, cyberbullying, monitoring attendance and supporting pupils in avoiding risks.
- Staff give pupils who have medical needs the appropriate support and care.

Quality of teaching, learning and assessment

Requires improvement

- The quality of teaching varies across departments. Some teachers focus too much on

their teaching rather than on what pupils should be learning. Teachers provide writing frameworks which do not always support the development of pupils' literacy. Pupils do not develop and deepen their learning because of this.

- The quality of teaching in mathematics and English is variable. Leaders are aware of this variation but are not clear about strategies to address this issue. Nevertheless, pupils are making better progress in mathematics and English.
- Teachers and leaders use a system to monitor and track pupils' progress. Leaders analyse the progress of groups in subject areas across all key stages. This gives leaders the information to challenge teachers when pupils are not making the progress of which they are capable. However, the quality of the information which teachers put into the assessment system is not always accurate. Therefore, leaders are not able to check that appropriate support for pupils occurs in a timely manner when pupils fall behind with their work.
- Leaders introduced an accelerated reading scheme to support weak readers. This initiative is having a positive effect. However, pupils in all key stages said that they rarely read for pleasure and are only familiar with school texts. A culture of reading across the school does not exist. Teachers do not support pupils in developing their literacy skills well enough.
- There is some effective teaching in the school. This happens where teachers use their subject knowledge to select challenging tasks for their pupils. Here, higher expectations of what pupils are capable of achieving support pupils to improve their learning. Furthermore, in some lessons, teachers choose to encourage pupils to ask questions and to develop their own ideas. This helps pupils to think more deeply about their learning.
- The quality of guidance that teachers give to pupils is strong and improving. Teachers follow the school's policy on feedback consistently. As a result, pupils receive effective guidance on improving their work. Pupils appreciate the guidance and use it to develop their understanding.
- Teaching in the sixth form is better than it is in key stages 3 and 4. Teachers know their students well and use this knowledge to plan activities which best meet students' needs. Students achieve outcomes in the sixth form which are typically above national averages.
- The school provides regular reports to parents. Parents said that they are happy with the information that the school provides on their children's progress.

Personal development, behaviour and welfare

Good

Personal development and welfare

- The school's work to promote pupils' personal development and welfare is good.
- There are very few instances of bullying and pupils said that teachers deal with this effectively. Pupils learn how to keep safe and lead healthy lives. Pupils enjoy school because of the support and advice that they receive from staff.
- A range of assemblies and lessons support pupils in developing strong morals and respect for other cultures. Raine's Foundation is a church school and the spiritual

aspect is visible in school. Incidents of derogatory language or racist and other inappropriate comments are rare. Pupils interact well with each other and with adults in school.

- There is a comprehensive programme of careers advice and guidance. Pupils receive individual careers interviews in Year 11. Leaders also decided that Year 10 pupils would undertake work experience. Local business people come into school and give pupils advice about career choices and the world of work. Most pupils said that the guidance helps them in their career choices. However, a few pupils in key stage 3 said that they would like more opportunities for careers advice.

Behaviour

- The behaviour of pupils is good.
- A new behaviour policy is in place. Teachers track pupils' attendance and behaviour with care. Staff support pupils' attendance by mentoring vulnerable pupils. Pupils' attendance has improved rapidly and is now above the national average. Persistent absence is also reducing. The school is effectively focusing support on improving the attendance of pupils from a White British background.
- Pupils are proud of their work and their school. They are developing as learners and are happy to share their books with visitors. Instances of pupils disrupting learning in the classroom are rare. When disruption does happen, it is the result of weak teaching. Pupils' behaviour in class and around the school is orderly and respectful.
- There is a system of behaviour points, which all pupils understand and agree is fair. The learning support unit provides strategies for pupils to manage their behaviour. External agencies provide additional support for pupils who need this. The rate of fixed-term exclusions has reduced over time and these are now well below national figures.

Outcomes for pupils

Requires improvement

- In the 2016 GCSE examinations, pupils' achievement and progress were well below the national average. Pupils' progress is improving but was below the government's floor target in 2016. Provisional outcomes for 2017 suggest that pupils' achievement has improved.
- The most able pupils do not make the progress they are capable of because expectations are too low. Their targets are not ambitious enough. As a result, the most able pupils are underachieving.
- Pupils' outcomes in mathematics and English are improving, particularly at key stage 3.
- Inconsistency in teaching is leading to some variability in pupils' progress. Pupils who have SEN and/or disabilities are making better progress now than was the case previously. New leadership in this area is improving the help and support that pupils receive.
- Leaders have improved outcomes for disadvantaged pupils. They have used additional funding more effectively. However, improvement has not been sustained over time.

- Historically, pupils have not been well prepared for their next steps into education, training or employment, particularly at key stage 4. Although there is variability at key stage 3, outcomes are improving and pupils are being better prepared for their courses at key stage 4. In the sixth form, students receive more intensive support and they progress to higher education, apprenticeships and employment at a rate that is much better than national.
- The curriculum is now more tailored to meet pupils' needs. School information, supported by inspectors' reviews of pupils' work, shows that pupils in key stage 3 are making better progress.

16 to 19 study programmes

Good

- Leaders in the sixth form have vision and know how to continue to improve the outcomes for students. They know where the strengths and areas for development lie and have effective plans for further improvement. Students achieve good outcomes at the end of their studies.
- Students make strong progress from their starting points. They develop independence in their learning with support from their teachers. Over the last three years, there has been an improving trend in outcomes in A level and work-related subjects. Students achieve outcomes that are above national averages.
- Learners feel safe and said that the school prepares them well for life beyond school. They receive considerable support with applications for university. Older students who have left the school give guidance to current students about making choices. Year 12 students undertake work experience. Retention in the sixth form between Year 12 and Year 13 is good. Students go on to a wide variety of destinations in higher education and employment because they have the knowledge to make good choices.
- Teaching, learning and assessment support students' progress effectively. Teachers know their students well and set challenging targets for them. Students work hard and are encouraged by their teachers. They make strong progress in achieving and surpassing their targets. However, in some teaching, teachers do not challenge students strongly enough to think deeply about what they are learning.
- Students' attendance in the sixth form is improving because leaders are working effectively to target attendance. When students are absent from lessons, teachers provide opportunities for them to catch up on any work they have missed.
- Students who are re-taking the GCSE examinations in mathematics and/or English make progress in line with that of other pupils nationally.

School details

Unique reference number	100979
Local authority	Tower Hamlets
Inspection number	10036369

This inspection of the school was carried out under section 5 of the Education Act 2005.

Type of school	Secondary comprehensive
School category	Voluntary Aided
Age range of pupils	11 to 18
Gender of pupils	Mixed
Gender of pupils in 16 to 19 study programmes	Mixed
Number of pupils on the school roll	566
Of which, number on roll in 16 to 19 study programmes	135
Appropriate authority	The governing body
Chair	Elizabeth Wolverson
Headteacher	Rob Hullett
Telephone number	0208 981 1231
Website	http://www.rainesfoundation.org.uk/
Email address	success@rainefoundation.org.uk
Date of previous inspection	10– 11 November 2015

Information about this school

- The school does not meet requirements on the publication of information about pupils' outcomes in GCSE examinations, the link to performance tables, pupil premium and Year 7 catch-up funding, and governors' business and financial interests on its website.
- Governors appointed the interim headteacher to the permanent post in October 2017. During the interim period, the headteacher moved the school on to one site.
- Raine's Foundation School is a voluntary aided Church of England school in the Diocese of London. A section 48 inspection of the school's religious faith took place on 11– 12 May 2017.

- The school does not currently use any alternative provision.
- This is a school which is smaller than the average-sized secondary school.
- The proportion of pupils known to be eligible for free school meals is high.
- A high proportion of pupils are from ethnic minority groups.
- Valentine's School in Redbridge, Morpeth School in Tower Hamlets and Central Foundation School for Girls support the school.
- In 2016, the school did not meet the government's floor standards, which set the minimum expectations for pupils' attainment and progress by the time they leave school.
- The school meets the Department for Education's definition of a coasting school based on key stage 4 performance results in 2016.

Information about this inspection

- Inspectors visited a range of lessons to evaluate the quality of teaching over time.
- Inspectors met with groups of pupils and spoke to pupils around the school.
- Inspectors reviewed pupils' books and scrutinised a range of documents which related to safeguarding, behaviour, attendance and progress.
- Inspectors met with senior leaders, middle leaders and teachers who are new to the profession.
- The lead inspector met with governors and representatives from the local authority.
- Inspectors evaluated the 62 responses to Parent View, Ofsted's online questionnaire for parents and 26 responses to Ofsted's online questionnaire for staff. There were no responses to the pupil questionnaire.

Inspection team

Dame Joan McVittie, lead inspector	Ofsted Inspector
Sunday Ellis	Ofsted Inspector
Sarah Parker	Her Majesty's Inspector
Anthony Wilson	Ofsted Inspector

Any complaints about the inspection or the report should be made following the procedures set out in the guidance 'Raising concerns and making a complaint about Ofsted', which is available from Ofsted's website: www.gov.uk/government/publications/complaints-about-ofsted. If you would like Ofsted to send you a copy of the guidance, please telephone 0300 123 4234, or email enquiries@ofsted.gov.uk.

In the report, 'disadvantaged pupils' refers to those pupils who attract government pupil premium funding: pupils claiming free school meals at any point in the last six years and pupils in care or who left care through adoption or another formal route. www.gov.uk/pupil-premium-information-for-schools-and-alternative-provision-settings.

You can use Parent View to give Ofsted your opinion on your child's school. Ofsted will use the information parents and carers provide when deciding which schools to inspect and when and as part of the inspection.

You can also use Parent View to find out what other parents and carers think about schools in England. You can visit www.parentview.ofsted.gov.uk, or look for the link on the main Ofsted website: www.gov.uk/government/organisations/ofsted.

The Office for Standards in Education, Children's Services and Skills (Ofsted) regulates and inspects to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. It regulates and inspects childcare and children's social care, and inspects the Children and Family Court Advisory and Support Service (Cafcass), schools, colleges, initial teacher training, further education and skills, adult and community learning, and education and training in prisons and other secure establishments. It assesses council children's services, and inspects services for children looked after, safeguarding and child protection.

If you would like a copy of this document in a different format, such as large print or Braille, please telephone 0300 123 1231, or email enquiries@ofsted.gov.uk.

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/, write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

This publication is available at www.gov.uk/ofsted.

Interested in our work? You can subscribe to our monthly newsletter for more information and updates: <http://eepurl.com/iTrDn>.

Piccadilly Gate
Store Street
Manchester
M1 2WD

T: 0300 123 4234
Textphone: 0161 618 8524
E: enquiries@ofsted.gov.uk
W: www.gov.uk/ofsted

© Crown copyright 2017

This page is intentionally left blank

Report on alternative options to the closure of Raine's School

In 2013, the then Chair of Governors of Raine's Foundation school wrote to the Department for Education (DfE) on behalf of the Governing Body with a request to convert the school to an academy. In his response of the 10th January 2014, Dominic Herrington, Director of the Academies Group at the DfE, declined on the basis of the school's attainment being below the national average. At the subsequent governing body meeting of the 22nd of January 2014, it was agreed unanimously to withdraw the application. At this meeting, the headteacher drew the attention of the Governing Body to the

- Inaccurate prediction of GCSE grades for English and maths for 2013
- Over optimistic GCSE predictions for the academic year 2014
- The low number of pupils that has applied to Raine's for September 2014 as their first choice (65 children) and second choice (85 children).

This demonstrates there have been concerns about Raine's school over a number of years and the Governing Body were fully aware of the concerns.

The school was inspected by Ofsted in during November 2015, when was given an overall judgement of Requires Improvement. On the 1st December 2015, the then Interim Director of Children's Services (DCS) wrote to the Chair of Governors outlining concerns about

- Weak governance
- Lack of compliance with statutory requirement on the consultation over changes to admission arrangements
- A serious decline in the school roll over five years
- The financial position of the school.

The DCS indicated an intention to exercise her statutory powers and make an application to the Secretary of State for Education to put an Interim Executive Board in place. Following this, an Extraordinary Meeting of the Governing Body was held on the 10th December 2015, where the Governing Body disbanded itself. Subsequent to this, a new Governing Body chaired by the Bishop of Stepney nominee Liz Wolverson OBE was installed in January 2016.

Ms Wolverson is the Chair of the Board of Directors for the Brightwells Academy Trust and Chief Executive Officer for the London Diocesan Board of Schools Academies Trust and so is both knowledgeable and experienced in the legislation relating to academisation.

During the period September 2016 to June 2018 the Governing Body referenced or discussed

- Soft federation with another London Board of Diocesan school
- Academisation on four occasions

but no action was taken by the Governing Body of Raine's to progress either federation or academisation.

During June/July 2017 the London City (Teaching School) Alliance was asked by the LA to take the lead on providing school improvement support for Raine's. This was because the DfE school improvement funding could only be accessed through a Teaching School Alliance.

The London City Alliance includes two local academy trusts, both of which played a role in supporting Raine's. In the first instance, Graeme Price, Chief Executive of the University Schools Trust took the lead in working with Raine's and arranged for a review of the school which took place during September of 2017.

Subsequent work, which included a successful bid to the DfE for funding, was led by Dr Vanessa Ogden, the Chief Executive of the Mulberry Schools Trust. The DfE funding for Raine's was agreed, dependent on the completion of a full financial review of the school which eventually took place during the autumn of 2018.

At no point did either the Chief Executive of the University Schools Trust or the Chief Executive of the Mulberry Schools Trust express any interest in or desire to enter into a longer lasting or formal relationship with Raine's, which could have resulted in Raine's joining either of the academy trusts. With regard to Raine's Foundation school, the Chair of Governors chose not to take forward any discussion on these options with either of the Chief Executives.

Following the publication of the poor GCSE results in August 2018, the DCS exercised her statutory powers and made an application to the DfE to establish an Interim Executive Board to take over the governance of the school. The Interim Executive Board held its first formal meeting on the 29th October 2018. The role of the IEB was to support the new interim executive headteacher, Mr Paul Woods, substantive headteacher of Sir John Cass Foundation School, in raising standards in the school and this was the focus of their meetings. Mr Woods remained at the school until 31st March 2019.

At no point during Mr Woods seven month tenure at Raine's did the Chair of the Governing Body of the Sir John Cass Foundation school and Mr Woods consider it appropriate for the Governing Body of Sir John Cass to discuss any ongoing or more formal arrangement between the two schools.

Mr Woods informed the LA that he intended to return to his substantive headship at Sir John Cass at a meeting on the 23rd of November 2018 and as a consequence there was a consideration of the potential options for the future of the school.

The academisation of a school is a statutory process which is described in a suite of guidance documents published by the DfE and updated regularly. The publication 'Due Diligence in academies and maintained schools; Best practice guidance for Governing Bodies of maintained schools, local authorities and Academy Trusts' of February 2019 explains

'... The due diligence process is an important element of the risk management of any conversion or transfer, with the findings of the work informing the decision making process of respective stakeholders; the incoming school, the incoming trust and the Department for Education (DfE)...'.

Stage 1 of the required due diligence process provides an overview of the school's educational performance and the financial position of the school, through consideration of factors including:

- Educational Performance
- Ofsted reports
- Financial information
- Admissions
- Capacity, pupil numbers and school demographics, pupil premium.

The LA had formally registered concerns with regard to all of these factors and these concerns had precipitated the use of its statutory powers to intervene in the school. Further to this, standards had fallen further following the DfE's response to the Chair of Governors request that the school become an academy in 2014. These factors made it unlikely that Raine's would be an attractive proposition for any academy trust to consider, even prior to undertaking a due diligence process. This view was confirmed by the lack of interest from the University Schools Trust and the Mulberry Trust in opening a discussion with the Governing Body about Raine's joining their academy trusts.

With regard to federation with another Anglican school, prospective partner schools would be concerned about the potential financial liabilities and the entrenched poor standards they would become responsible for under a hard federation agreement. As described above, Sir John Cass Foundation school expressed no interest in federating with Raine's Foundation school and so there was no benefit to formally pursuing this as an option. During this time the LA supported Raine's prioritised investing its diminishing resources on the provision of school improvement support.

As a consequence, the Raine's Foundation IEB agreed to a feasibility study in January 2019 which considered amalgamation with Oaklands School, as by that point options for the school were limited.

This page is intentionally left blank

**Public Consultation Meeting on a proposal to close Raine's Foundation School
(including plans to expand nearby Oaklands Secondary School, for the transfer
of Raine's pupils)**

Meeting held in the Hall at Oakland's Foundation School on

Wednesday 19th June 2019 at 6pm until 8:17pm

Minutes

In attendance:

Inigo Woolf - London Diocesan Board for Schools (LDBS) Representative

Local Authority Officers:

Debbie Jones – Director Children's Services

Christine McInnes - Divisional Director Education and Partnership

Terry Bryan – Head of Pupil Services and Pupil Sufficiency

Lindsey Bell – Strategy and Policy Officer

Runa Basit – Head of Governance and Information

Farhad Ahmed -Training and Business Development Manager Governor
Services

Rochelle Clerk - Governor Support Officer

Councillor Danny Hassel – Lead Member for Education

Raine's Foundation Student, parents and carers

Members of the Public (approximately 50)

Press

** Members in this document refer to members of the public/parents/carers or
other unspecified.*

1. Welcome and Introduction of Chair

Patrice Canavan, Executive Headteacher of Raine's Foundation School and
Oaklands Secondary School welcomed attendees to the meeting.

Alan Parker would Chair today's meeting.

2. Chair opens the meeting

Alan Parker had been appointed as an independent Chair to the Joint
Steering Group for the Governing Body of Oaklands Secondary School and
the Interim Executive Board (IEB) of Raines Foundation School as he was a
neutral party.

Alan Parker gave details of his background, he had been the Director of Education at Ealing Council, moving on to become a Schools Adjudicator for 8 years where he worked to mediate and find solutions when process such as this went wrong. This meant that he had a good understanding, particularly given his legal expertise.

Alan Parker introduced the key officers on stage, **Inigo Woolf**, Chief Executive of the London Diocesan Board for Schools (LDBS); **Christine McInnes**, Divisional Director Education and Partnership; and **Debbie Jones**, Director of Children Services.

Runa Basit, Head of Governor Services, **Lindsey Bell**, Strategy and Policy Officer, **Farhad Ahmed**, Training and Business Development Manager and **Rochelle Clarke**, Governor Support Officer were present to ensure a clear record of the meeting was taken.

It was noted that members of the Governing Body, IEB and senior staff members were also in attendance.

Alan Parker detailed the layout of the consultation meeting for attendees. Key officers would go through the detail outlined in the consultation document. It was noted that a detailed consultation document had been produced and hard copies was available at the meeting and is also available online.

This was a difficult and challenging situation so it was important that there was openness and transparency so that the school community felt that decisions were not being made for them.

The reason for the meeting was to enable the Diocese and the Local Authority to provide background and context and to give the school community an opportunity to ask questions and get feedback.

Alan Parker informed that he would make sure that the school community was heard.

3. Introduction to the consultation and background information

Debbie Jones thanked all in attendance for coming to the meeting today.

Following discussions over the spring term, it was the view of the LDBS and the Local Authority that Raine's Foundation School was no longer sustainable. Due to this the Local Authority was proposing that the school be closed with effect from 31st August 2020. The Local Authority was also proposing the expansion of Oaklands Secondary School to increase local parental choice.

A huge amount has happened at the school since 2013 and closure was being proposed in response to the decline in pupil numbers. The school has a legacy deficit budget and this was rising year on year. This was now beginning to affect the school's ability to provide a high quality education for the pupils at Raine's Foundation School.

4. Input from the London Diocesan Board for Schools

Inigo Woolf informed that over the last five to six years there had been several attempts to increase pupil numbers to assist with the deficit budget but these attempts had been unsuccessful. Due to the financial constraints, this was restricting the quality of the religious education of pupils and this was why the decision to move to consultation had been made.

Christine McInnes went through the sequence of events that lead to the decision to go to consultation as there were a lot of questions coming from the school community around why this decision had come at this time.

~~The school intake is 160 pupils.~~

In 2011 the school was graded 'Good' by Ofsted but only received 63 first choice applications.

In 2014 the school worked with the Local Authority Admissions Team with a view to increase pupils numbers. There were 65 first choice applications.

In 2015 Ofsted reported that the school Required Improvement and indicated in the report it had found weakness in the Governing Body.

Following the report the Local Authority identified the school as a 'school of concern' and was in the process of executing its statutory requirement to send a formal warning to the school when the Governing Body decided to resign. This meant that the Local Authority was unable to serve the warning notice. New governors were appointed, constituting a new Governing Body in January 2016.

In 2016 there were 57 first choice applications.

In 2017 the school was graded 'Requires Improvement' for the second time. The Local Authority issued a warning notice and started the process of gaining permission from the Department of Education to remove the existing Governing Body. This process is evidence based. Evidence is needed to be submitted to the DfE who was in agreement that the school was not operating properly.

There were 63 first choice applications.

In 2018 the DfE agreed the removal of Governing Body and an Interim Executive Board was appointed to govern the school. As well as this an interim Executive Headteacher was appointed to run the school. There were 45 first choice applications.

Progress was made in 2018 and this was acknowledged by Ofsted.

A number of questions were asked by the school community. The Chair informed attendees that questions could be asked after the presentation had been given.

In 2019 Oaklands became the support school for Raine's. There were 29 first choice applications.

For a long period of time families have not been choosing to send their children to Raine's Foundation School and a present the school is half empty. By the end of the year when the current Year 11 leaves the school this

number will be lower. The deficit is growing. The Local Authority is happy to support with these costs but the deficit is growing.

The Options explored by the Governing Body and the IEB were outlined:

- Converting to academy status and joining a Multi Academy Trust.

This option was not plausible due to the financial situation at the school.

- Federating or Amalgamating with an existing Church of England School was explored by the Diocese but was subsequently deemed as not possible given the distance between the two schools and that they served different communities.
- Reducing the School size through its Planned Admission Number was looked at but was deemed unviable due to the financial position of the school. The school was already experiencing a significant decline in applications for entry to Year 7 and also other year groups and was already substantially below the four forms of entry that would have been required to secure it financially.

Places at Oaklands will be made available for any Raine's Foundation School pupils in Years 7 to 11, should parents wish to take it up. There will also be 1-2-1 meetings with parents and the Local Authority for parents that have any questions relating to their children.

QUESTION: *We have been told by the Headteacher that there will be no Year 10 at Raine's next year. This is not what your presentation is saying. The information being presented is incorrect.*

Alan Parker reminded attendees of the process of the meeting and informed that if there were any issues relating to the facts he would investigate this after the meeting, during the consultation process. There would be time during the consultation to raise any concerns.

Christine McInnes informed that the consultation would end on 24th July 2019. After this time, if the plans proceeded, statutory notice will be published in November 2019. There will then be a four week consultation period with a final decision made by Cabinet in the spring term 2020.

Hard copies of the consultation were handed out to attendees.

5. Chair opened the floor to questions

The Chair informed those in attendance that the press were in attendance. Anything said from the standpoint of the key officers was on record. If there were any questions from the floor, please can that person make clear to the press if they would like to be identified or not.

Danny Hassell left at 7:15pm

The Chair asked attendees to listen to the responses from the Diocese and the Local Authority. If there was any disagreement with the responses, they had up until 24th July to disagree. The Chair promised he would read every single disagreement and use his position to investigate further.

Attendees were informed that if they left their email addresses they would receive the full consultation.

[Question are included below]



Raine's FAQ.pdf

Debbie Jones on reviewing all of the questions informed that the key officers were going to group together the questions so they could ensure that they answered as many questions as possible. Full answers would be provided.

The fact that attendees were saying there were issues with information accuracy and the issues around not being able to access information and the lack of response would be investigated and dealt with by Terry Bryan, Head of Pupil Services.

Terry Bryan (TB) who was in attendance at the meeting introduced himself to attendees. Terry informed that he had met some of the families present during surgeries at the school. One of the questions related to the history of what the Local Authority had done to support the school when it was struggling. In 2011 the school was rated 'Good' by Ofsted however since then application numbers had declined. TB informed attendees that if they went online and looked at the Admissions booklets for Secondary Transfer, it gave a historical breakdown of applications for Raine's Foundation School.

In 2014 there were 350 applications, 65 of which were first choice.

In 2015, 278 applications, 62 were first choice applications.

In 2016 256 applications, 57 were first choice applications.

In 2017, 233 applications, 62 were first choice applications

In 2018, 215 applications, 49 first choice applications

In 2019, 133 applications, 29 first choice applications

There was clearly a trend in declining pupil numbers. When Mr Bradshaw first became Headteacher the first thing he did was to contact the Local Authority to request support with the issues of pupil recruitment. The next thing he did was to review the Admissions Policy. TB said that the LA had supported the school in rewriting its admissions policy, to encourage more applications from children of world faiths. The LA also helped the School in introducing scholarship programmes for Maths and Sports to further encourage applications from children with a particular interest in these subjects.

The School had also tried to emulate arrangements at other community schools by introducing pupil ability banding. Children who did not get their first choice were offered places at Raine's Foundation School in an effort to further boost the schools pupil numbers.

The LA had supported the Raine's by agreeing (with other schools) that the School would not have to take In-year admissions of children that had been previously excluded from other schools, given its difficulties with pupils with challenging behaviour.

Although the LA has experienced numbers increasing in its Secondary schools, the numbers at Raine's were still declining.

QUESTION: How many families were offered a place in Year 7 this year?

40 originally and then that went down to 36. Most families have now got offers in alternative schools. There are now only 17 children that have not accepted alternative offers.

QUESTION: Will there be no Year 10 next year?

[Remark from a parent noted: this is incorrect; I spoke to Mr Ramsey myself this week]

TB clarified that there are currently 65 pupils on roll in Year 9. After meeting with some of the parents and due to the risk of closure, children starting their GCSE's in Year 10 may be subject to a different curriculum offer if they have to move school in Year 11. 45-50 families have made the decision to apply to another school to avoid the distress this would cause the pupils.

QUESTION: A member commented that – ‘90% of the families I spoke to were willing to finish Year 10 and start at Oaklands but they were so shocked by the behaviour at Oaklands, the racist and verbal abuse. Four police vans had to be called. Also due to the religious abuse they changed their minds. The Headteacher did nothing about this but write a letter to say sorry. This is unacceptable.’

QUESTION: ‘I saw the school was still advertising its sixth form and so I emailed the Executive Head to see if I could apply and I have had no response. Is this false advertising?’

‘If you were consulting the parents would have been properly consulted. This is a done deal.’

QUESTION: ‘The Diocese has said nothing, there is no provision for our faith at Oaklands, and I have checked this. How can you let our children down? Our children’s faith is not being nurtured.’

Inigo Woolf said we don't control the school it has its own IEB/Governing Body. We do agree that it is our responsibility to ensure our children are provided for. We want to make sure if children are transferred there will need to be an adequate provision for our children to support their faith. This has not been planned yet as we are still in the consultation phase.

QUESTION: Is the Diocese in support of the school closing?

We want to make sure that the children have the support they need for a good education.

STATEMENT: Before you redeveloped the school there should have been a plan

QUESTION: What can the parents do to support the school and stop it from closing?

The Chair said, if you read the consultation, this outlines what the school has already done. We are here because they have run out of ideas. If there are things you think they should do this is your opportunity to share.

STATEMENT: Everyone who works in Children's Services should be glad they have parents who really care.

QUESTION: We don't want alternatives, we want Raine's. How can we keep the school open? If its money we can start a crowd fund page.

STATEMENT: We are invited now when you want to bring the schools together but not when the school really needed the support to turn it around.

QUESTION: Raine's was meant to become an academy. Why was this turned down when it was all set to go ahead?

This is not for the Local Authority to answer as this would not have been a decision the Local Authority could make and would have been for the Governing Body at the time.

STATEMENT: You are taking away the only Church of England School in the community - this is against our human rights.

QUESTION: Couldn't we merge with Sir John Cass?

Inigo Woolf said that he believed that the foundation would not have supported this –

STATEMENT: I checked this and you did not ask the school.

STATEMENT: You have been trying to close the school for 30 years. This is an accumulation of your incompetence. You are a disgrace. STATEMENT: They put in an IEB illegally and then after that they put in another IEB and that was probably illegal too.

QUESTION: You say there was a decline in pupil numbers, did you compare this to other schools.

Yes we did, TB, this information is publicly available..

QUESTION: I work for the Trust and I was also a governor at Raine's. We went down to the Town Hall to raise concerns and ask for support in 2015. You did not give us any support, you directed us to local companies as you said you did not know the demographics.

The Chair informed he would ensure that any information that had been requested that was not in the consultation document would be shared with attendees.

Laura Gibson from the Parents Steering Group advised that if attendees shared their email address with her she would ensure that they received all paperwork.

QUESTION: When was Mrs Canavan appointed onto the IEB?

QUESTION: Will the Local Authority be committing to pastoral care for those who have just finished their exams. My son is worried.

Yes, the Local Authority is working with the current IEB to ensure pupils get the support they require.

QUESTION: What will happen with the sixth form?
The plan is to refurbish the previous lower school building.

QUESTION: But you don't have a lease on the building?

The LA is in talks with the Diocese.

QUESTION: why did you spend £17 million on refurbishing the school – if the school was failing? Why wasn't this money spent on promoting the school, investing in staff, fixing the school.

The Chair informed that he was going to bring the meeting to a close. This was not the end of the process as there would be a similar meeting held at Raine's Foundation School next week where this conversation would be continued.

Public Consultation Meeting on a proposal to close Raine's Foundation School (including plans to expand nearby Oaklands Secondary School, for the transfer of Raine's pupils)

Meeting held in the Hall at Raine's Foundation School on

Wednesday 26 June 2019 at 6pm until 8:20pm

Minutes

In attendance:

Local Authority Officers:

Christine McInnes - Divisional Director Education and Partnership
Terry Bryan – Head of Pupil Services and Pupil Sufficiency
Lindsey Bell – Strategy and Policy Officer
Farhad Ahmed -Training and Business Development Manager Governor Services
Lorraine Feyi-Shonubi - Governor Support Officer

Kate Roskell - London Diocesan Board for Schools (LDBS) Representative and Raine's Foundation Interim Executive Board Member

Raine's Foundation Student, parents and carers

Members of the Public (approximately 48)

Press

** Members in this document refers to members of the public/parents/carers or other unspecified.*

1. Welcome and Introduction of Chair

Patrice Canavan, Executive Headteacher of Raine's Foundation School and Oaklands Secondary School, welcomed those present and introduced Alan Parker the Chair.

2. Chair Opens the Meeting

Alan Parker (AP) stated that he was appointed three weeks ago as an independent Chair of the Joint Raine's/Oaklands Steering Group to manage on the consultation process on the possibility to close Raine's Foundation School (including plans to expand nearby Oaklands Secondary School, for the transfer of Raine's pupils) and provided a short synopsis of his professional background.

AP explained that this was the last of two Public Consultation Meetings and the format would follow last week's meeting.

AP introduced the Panel (CM, TB and KR) and explained that Inigo Woolf, Chief Executive of the London Diocesan Board for Schools and Debbie Jones, Director of Children Services Director (LBTH) could not attend the meeting but had attended the first Public Consultation meeting. He further stated that the meeting was the second of the formal consultation process and there were LA Officers who would be taking a record of the meeting.

AP stated that a presentation outlining the background to proposals was shared at the meeting held last week and some people had suggested that it would not be necessary to present the slide again however if there members who had not been at that meeting or wanted to see it again, then it would be shared for their benefit. Three members of the public expressed interest. AP drew members' attention to the section where parents and the public could give their views.

3. Introduction to the consultation and background information

The presentation slide was shown and CM provided a summary of the presentation and hard copies of the presentation were also made available. The presentation slide can be viewed below.



Raine's Public
Meeting 26-06-19 Pre

In closing the presentation, CM thanked all members for attending today.

CM explained that the consultation would run until the 24th of July 2019 and the Council would consider responses and the outcome of the consultation would inform the decision by Cabinet members on whether or not to issue a statutory notice. If the Cabinet agreed to issue statutory notices, a four week consultation period would be launched and the timeline would be November 2019 with a final decision being made by the Cabinet in the Spring term of 2020.

4. Chair opens the floor to questions

AP invited questions and comments and asked speakers to identify themselves because it was useful to know who they were and helped understand what they were saying (sic). He informed that the press would quote by name however any members who did not wish to be identified needed to make it clear from the outset.

AP stated that a great deal of work had been undertaken by the Parents Steering Group and the LA and as a result of that some particular questions had been identified and a document had been produced to answer those questions. The document can be viewed below:



Raine's FAQ.pdf

AP invited Laura Gibson (LG); a member of the Parents Steering Group to ask pertinent questions in relation to the document that ought to be answered by the panel first at today's meeting.

AP explained that the FAQ document would be updated accordingly following today's meeting.

LP introduced herself and stated that she was a former pupil, ex member of staff and had a child who attended Raine's Foundation School. The Parents Steering Group was petitioning to stop the closure of Raine's Foundation School.

LG asked whether there would be Year 10 from September 2020. TB answered that this was a consultation to close the School however closure would only take place if the Council agreed the proposals. Parents/carers of children in Year 9 would be made aware of a possible closure. TB acknowledged that this was a cause for concern for some parents because their children would be in the middle of their GCSEs.

LG asked why staff members had been told that there would be no Year 10 the following academic year. TB stated that the information had not come from the LA. However, given that a number of parents of pupils in the current Year 9 had chosen to apply for alternative schools, it was likely that the Year 10 group would be very small.

TB was asked whether the LA was encouraging Year 9 students to leave the School? TB emphasised that the LA was not encouraging parents to remove their children from Raine's, but that the School Admissions Team had met with parents, at their request, to explain the options and the risks should the School close at the end of the next academic year.

A member of the public questioned what the intended outcome of the consultation was because TB had mentioned "school closure" when this was a proposal. TB stated that when publishing a proposal the LA is explaining its intended course of action. However, the decision has not pre-determined and the intention in the consultation was to stakeholders/public the opportunity to comment on those proposals and put forward viable alternatives. The LA wanted children to have high standards of education, but it also needs to ensure that the School was sustainable. TB highlighted the downward trajectory in student numbers from 2013 and stated that for Year 7 entry in the 2019-20 academic year, there had been only 29 first preferences. With such a small number for Year 7 and the decline in pupil numbers in other year groups this presented a major problem in terms of the school's resources and its future sustainability.

A question was asked regarding the rewriting of the School's Admissions Policy to encourage applications from students from all world faiths in order to increase student numbers. TB replied that the LA took a number of steps to ensure more student applications, however one of the issues at the time was that the Governing Body did not immediately give approval for these changes, much to the frustration of the headteacher.

A council member commented that the LA had not supported the School because there were other issues, for example, in October 2018, Oaklands Secondary School and Mulberry School were encouraged to take more students than on their published admission numbers (PAN). TB stated that this was not the case and considered that the member had misunderstood the issue. TB stated that he would have a discussion with the member outside the meeting in relation to that point.

A member queried why after there had been no change to the trend of declining student numbers after the LA had stepped in. TB took members through the summary of historical applications on page 4 of the presentation slide. TB stated that this year there had been a total of 133 applications, but only 29 were first preferences. This meant that by National Offer day in March only 36 offers could be made as the vast majority of the 133 applicants were offered places at their higher preference schools. Previously the LA had allocated places at Raine's for pupils who did not get any of their preferences at secondary transfer. However, the majority of these declined the offer at Raine's, preferring to secure places at alternative schools.

Although LA provided substantial support to Raine's, it was also the governing body's responsibility to support the School when student numbers started falling. This included taking action to promote the School in the wider community, through advertising and other such measures to raise the school's profile.

TB also highlighted other issues with the School such as its rising budget deficit of £2.2m (by April, poor GCSE performance, weak leadership and governance that was identified by Ofsted and led to eventual changes to the governing body and subsequent Interim Executive Board. CM added that the LA had worked with the School since 2015 and put in place various methods of support, including peer support, performance reviews and funding to support its improvement plan. However, these actions did not have the desired outcome thus formal intervention was eventually deemed necessary.

A member referred to the School Prospectus that stated that the School had received over 400 applications for a particular year and **sought clarification**. TB explained that the last time the school had received 400 plus applications was back in 2011. He considered that it might have been an administrative error on the part of the School. The actual numbers from the previous year's admissions round are published in the LA's Secondary School brochure.

The Chair (AP) stated that the application system allowed every parent to put up to six school preferences in (first to sixth). The LA was referring to first choice applications and the School Prospectus might have been referring to the number of children who listed the School as a choice thus it was possible that the LA and the School were both right from a different view point.

Clerk's Note: *There was vociferous representation from some members regarding various issues relating to student numbers, lack of support for the School, the previous Governing Body and the School's financial position.*

A member questioned whether it would be possible to keep the School open for a further year to enable Year 10 students to complete their GCSEs. In response, TB stated that the School's financial position would not abate thus it was unlikely. However this could be proposed in response to the consultation. **In answer to a further question** about the LA supporting the School financially, TB stated that the LA relied upon a surplus budgets at other schools to fund those schools in deficit. It therefore needed to strike a balance between using money that could potentially be distributed across the board or using it to sustain a school which could no longer 'stand on its own feet'. Nevertheless, the current position was difficult and the proposal to close Raine's therefore need to be considered. TB further stated that the consultation allowed members to put forward suggestions that would enable the school to continue, bearing in mind that its funding was based on pupil numbers and the current pupil roll was so far away from it should be and there were fixed costs that could not be reasonably reduced.

In response to question 5 (**Where are Raine's 6th form pupils are going to go?**) TB replied that students in Year 12 would continue to Year 13. Those currently in Year 11 who were offered a place in the Raine's Sixth Form had been made aware that cohort in September was likely to be very low .. If this proved to be the case, Raine's may exercise its management powers to provide the education for those students at the site of an alternative school, to enable them to receive a full curriculum.

Members expressed that the Sixth Form was good and results had been good over the years. They **questioned** why it would close. Kate Roskell answered that the Sixth Form had historical good results however the outcomes in the last academic year were not good. A number of members commented that the former Headteacher's foreword in the prospectus stated that the School was doing well. Furthermore, the Prospectus sold the School as an exciting and wonderful place to be, yet the Panel was telling members that the School was failing thus giving false hope to prospective parents.

In answer to a question about moving the Raine's Sixth Form to the Lower Site, TB explained that it was not possible for Raine's to manage its limited resources across two sites as that would mean having more staff than it could reasonably afford.

A member asked why the LA was opening new schools in the Borough yet proposing to close Raine's. In answer TB explained that decisions on plans to open new free schools was a matter for the Department for Education, not the LA. However, when determining applications for new free schools, there is the need to consider, the availability of school sites; the current need and likely demand for the particular area in which the new school is located; parental preference; and the capacity of the provider to provide high quality education.

A member highlighted the positive things about the School's location and considered that the housing plans to build 36 units in the area would generate potential students for the future. Moreover, tax payers' money had been spent on renovating the School and now there were proposals for a closure. Furthermore, there was "nobody" looking to give the families proper support. A number of members agreed with the member's sentiments.

TB stated that Raine's (Bethnal Green), was no longer in an area of the borough with high demand for school places. Although there is some housing development planned this would not result in any significant increase in pupil numbers.

The reality was that families did not want to send their children to the School as evidenced by the decline in student numbers over the last nine year period when there had been a significant growth in the secondary school population. The LA was required to ensure that school places were of high quality thus schools really needed to be Good or Outstanding. Raine's School had been below standard for a while and positives like the School's Sixth Form would difficult to sustain, given that numbers were less than the DFE recommendation of 200. A number of members expressed their anger at the plans to potentially close the School and stated that there were students and members of staff to put into consideration.

A member sought clarification why the IEB comprising of eight members had six members who sat on the previous Governing Body (GB) which was considered weak and not approved rewriting of Admissions Policy early on. CM stated that this was not correct and explained that the Regional Schools Commissioner (RSC) acting on behalf of the secretary of state had appointed the IEB in consultation with the relevant bodies and in this case, a nomination had been sought from the Raine's Foundation Trust but that was not accepted. The LA submitted two nominations which were accepted thus there was only one member on the IEB who was on the previous GB.

A member asked why the Foundation Trust was not involved with the Joint Steering Group or the process. CM stated that the consultation was open for members to respond in relation to any issues but the Trust was kept informed directly.

A member asked whether anyone had asked students what they wanted. This was followed by an applause from members. Another member expressed an issue of changing information about student number and stated that she had applied to the School to save their child (sic) and the School from closure thus this situation was concerning for parents.

A student commented that the proposals were putting stress on the students. Furthermore, she had three weeks to find a new school because she would not be able to complete her GCSEs at Raine's if the proposals to close the School were agreed. Moreover, she had established friendships for three years and could end up in a school she did not like. There was an applause from members. TB addressed the student directly and stated that he was truly sorry that Raine's had reached the stage, where it had become necessary for the LA and Diocese to consider the School's closure. He understood how upsetting this was for all concerned, but particularly students and staff. He acknowledged that the previous governance and leadership of the school had failed its students and staff and the LA would have wanted to have intervened much sooner. However, it was obstructed from doing so. He further acknowledged that that the School's failure was therefore a collective responsibility of the LA, the GB and the Foundation Trust, given that at crucial times it was evident these agencies were unable to work together to bring about a positive future for the school.

A member asked why her daughter's brother had been offered a scholarship before Christmas if the school would eventually close. TB apologised and said that when the School started recruiting for its Year 7 intake in September 2019, it was not anticipated the LA would need to consider the school's closure. However, the numbers for Year 7 and other year groups were critically to the extent where it has been determined that the School is no longer viable.

A member asked that if few parents had applied why did the LA not decline the applications and not make offers at Raine's. TB replied that with 133 application the LA was optimistic that the final numbers would be reasonable, but it later became apparent that the cohort would be too small when compared to the pupil numbers across the whole school and the extent of the schools budget position.

A lengthy discussion about offering Year 7 places ensued and the Chair stated that the matter was complicated and clarified that regulations were rigid. The LA however could not deny students a place whilst the School was still open which is why offers had been sent and parents were subsequently approached making them aware of potential risk. Some members commented that the LA had not made parents aware of that legal right. **In answer to a question**, AP cautioned that although parents/carers had a legal right and could insist to have their child attend Year 7, however **should** the proposals turn to a formal notice, the LA could apply to the Office of the Independent Adjudicator to vary the PAN and reduce it to zero thus technically there would be no places by March 2020.

Another member commented on the uncertainty of getting a school place at another school and expressed that the waiting list was a changing picture and a place had now been offered a place at Morpeth after being 12th on the waiting list. TB replied that the waiting list can often move quickly and

the LA's School Admissions staff administered arrangements expediently, to ensure that any spare places could be identified and offered at the earliest opportunity.

LG referred to question 12 on the FAQ Document about whether students would get special dispensation for examinations. In answer TB stated that the special consideration could be afforded to students in these circumstances however the decision lay with the examination board and was considered on each individual case but the LA was reviewing whether the situation at Raine's fell within the guidelines agreed by all of the examination boards.

A member asked how long the LA had been considering the proposed closure of the School. TB answered that the thought to close a school would not have been in anybody's mind ordinarily however when it became clear that the School was not sustainable, a decision was reached by the 31st of March 2019.

In response to a question about the School converting to an academy, TB stated that the School needed to satisfy various performance conditions to convert to an academy. Moreover, no Academy Trust would be able to take on Raine's due to its financial position. TB further stated that the chair of the previous GB was the CEO of an academy trust and would therefore have been in a strong position to advise on this option. **A further question was asked** about whether any schools were approached to consider a federation. Kate Roskell stated that a federation with other schools is very difficult particularly in a situation that Raine's is in and it is usually a matter of having a conversation with a potential school in the first instance. Kate Roskell further stated that she would investigate whether any schools were approached and which they were as requested.

A member stated that when she was Chair of the GB the Schools finances were healthy when the GB at the time considered applying for academy status and therefore **sought clarification** on what the barriers were. In answer, Kate Roskell stated that the Diocese would have taken into account the decline in student numbers. When the idea was explored again the financial position would have been considered and it might not have been as strong.

A member commented on the changes to the GB and subsequent appointment of the IEB and **asked** why an ineffective GB would have ratified the IEB. CM clarified that the GB did not ratify the IEB but the IEB came about because the leadership/GB was inadequate and the decision was imposed by the DfE.

A member expressed that she felt that the LA had failed the School by not intervening sooner **and asked** why the LA or the Diocese had not stepped in when the School had started to fail. She further asked where the deficit had come from. TB replied that the deficit happened due to declining pupil roll, which started prior to 2011. TB further explained that during this time, the LA had discussed with the then Headteacher about changing the Admissions Policy to encourage applications from the non-Christian community, but this did not happen until 2015. A member pointed out the Admissions Policy for the School stated that Raine's was a Church of England School **not a multi-faith school**, which was not helpful in attracting pupils.

A member further asked whether TB was blaming the GB for not agreeing to rewrite the Admissions Policy at the time. In answer TB said that he was stating a fact as well as acknowledging that it was the GB's responsibility. Kate Roskell further added that the LA undertook the work to rewrite the

Policy however the Diocese did not support the change at the time. LG stated that in her opinion, the views of the Diocese were not objective at the time. When she joined the School as a member of staff in 2014, the School's position was to welcome to all families to apply but there was a difference between an Admissions Policy and marketing or advertising the School.

A member sought clarification regarding the three different Headteachers over a period of three years. In answer, it was explained that following the outcome of the Ofsted Inspection (second 'Requires Improvement' Judgement), there was a need to strengthen the leadership. An Interim Executive Headteacher was therefore brought in to increase the leadership capacity. December 2018 saw the departure of Rob Hullet (Headteacher). Paul Woods left at the end of the Spring Term and Patrice Canavan was appointed by the LA as the Executive Headteacher to continue.

A member asked whether she could ask questions to members of staff who were present. In answer LG stated that members of staff were not permitted to speak because it constituted a conflict of interest.

LG sought clarification regarding the response to FAQ No.14 regarding "other communities" and referred to the consultation document under Paragraph 3 emphasising the "different communities" in the statement "*The option of amalgamating Raine's with an existing Church of England Secondary School in Tower Hamlets was explored with the Diocese, but this was subsequently deemed not possible, given the distance between the two schools and that they served **different communities.***" KR stated that when looking to potentially amalgamate church schools you would look at different parishes which may be in different geographical locations. LG expressed that the School had students from *different parishes* and suggested that perhaps the wording needed to be changed because it did not sound right. KR acknowledged the point.

A further question was asked in relation to the response in the FAQ No.14 about "equal opportunities". LG asked how the equal opportunity was given to access a high quality local school provision. In answer, it stated that in LBTH, there was Sir John Cass which was CoE school and members replied that it was oversubscribed and questioned which faith school they were supposed to send their children. In response, members were informed that various possibilities had been explored but it had not been possible to have arrangements with the nearest faith school because of the oversubscription at Sir John Cass but the LDBS had made arrangements with the Urswick School that any student at Raine's who met the admissions criteria for the Urswick School (Hackney) would be placed at the top of the waiting list. LG expressed that the Diocese did not seem to answer some questions but assured members that she would pursue some questions with them (Diocese).

A member raised concern regarding the racial and religious abuse to a group of parents and students from Raine's who had been touring Oaklands School and further stated that the students at Oaklands had no regard for their Senior Leaders who were present during the incident. **The member questioned** what type of school the LA was trying to send their children to and added that physical threats were directed at their children and the other option to send their children to a faith school outside the Borough with rising knife crime was scary. CM read out the response sheet which explained the action Oaklands had taken and added that the incident was very unfortunate.

Some members expressed that although action had been taken, it was not good enough because their children had also been mentally assaulted. Furthermore, because of the abuse, many parents

were now trying to move their children from Raine's for Year 9 but there were no real school choices. A member stated that she had made applications to four other schools and was waiting to hear back. LG shared a comment considered negative that had been made by the Headteacher of Raine's in respect to fasting and stated that it was disappointing for a Headteacher of a faith school to make disparaging comments about the faith of students at Raine's. LG further stated that the students at Raine's and Oaklands did not get on. A member agreed and stated that the students had never got on. TB responded by stating that when proposing to close a school, places had to be expanded in another school but unfortunately the qualities of the school mentioned were not attractive to the community. He encouraged parents/carers to talk to him or his colleagues in Pupil Services (Admissions) to explore school options. Moreover, the admissions team were working in conjunction with Raine's offering one to one meetings with parents and talking about vacancies in some schools that could be considered.

A Raine's student expressed that the incident also petrified students and they were worried that the incident at Oaklands could be repeated at another school. She **asked** whether there would be support to move to another school should they suffer abuses or are bullied because that would impact their education and outcomes. TB assured her that there would be transition programmes in place to support the students in their new schools. The schools would make every effort to support the students and help them establish positive relationships to the benefit of their education.

A question was asked whether there was evidence to support the attempt to recruit Parent Governors on a number of occasions (FAQ No.36). CM stated that this would have been evidenced in the GB Minutes of meetings.

A member considered that the School might not have been open about the financial position and **asked** to see the budget in order to understand the deficit. The deficit was stated and AP expressed that they might have been some misinformation however he was respectfully suggesting that the way forward could be to come up with a viable plan to reduce or clear the deficit. A member suggested that the School community could explore crowd funding. Other suggestions from members included selling parts of the School but it was explained that the land was partly owned by the Trust and the LA therefore it was complicated. TB reminded members that in addition to addressing the budget deficit, student numbers needed to be substantially increased. Members were requested to put forward suggestions through the various channels as specified in the consultation document.

5. Other

AP invited Mickey Ambrose to the floor. MA was backing a petition to save the School from closing. He raised the three salient points as follows:

- with regards to the Year 9 visit to Oaklands, there had been four incidents where students have come from one school to Oaklands and have been attacked;
- approximately £23m was invested in the Buildings for School Future so why should the school be closed after it had been expanded and then to be closed three years later;
- oddly, one parent from Oaklands turned up to the Public Consultation Meeting which implied that the Executive Headteacher did not inform the parents about this significant consultation.

MA concluded by stating that funds had been raised and a parent of a child in the School had instructed Irwin Mitchell Solicitors to challenge the flaw in the consultation process and urgent letter before action regarding the consultation to close Raine's Foundation had been submitted to the LA this afternoon and a response was required to respond within three working days. MA concluded by reading a letter from the solicitors.

The Chair thanked everybody for their attendance and closed the meeting.

End of meeting.

Response to public consultation on a proposal to close Raine's Foundation School

Analysis of Responses to the Public Consultation on a proposal to close Raine's Foundation School (including plans to expand nearby Oaklands Secondary School, for the transfer of Raine's pupils)

1. Introduction

- 1.1. London Borough of Tower Hamlets Local Authority (LBTH), the Church of England London Diocesan Board for Schools (LDBS) and the Interim Executive Board (IEB), which is currently providing governance for Raine's Foundation School (Raine's), are considering the School's closure as part of an amalgamation with nearby Oaklands Secondary School.
- 1.2. This proposal is being made in response to the declining and now low number of pupils who attend the school (520 pupils attending a school with a capacity of 1050) and the significant financial problem this presents. There is every indication that the number of pupils attending Raine's will fall even further over the coming years. LBTH has a duty to secure high-quality education for all children.
- 1.3. Despite best efforts to find robust solutions, LBTH and LDBS are unable to be confident that this school can become secure enough to provide the best quality education for the children of Tower Hamlets and surrounding areas.
- 1.4. On 10 June 2019, LBTH launched a public consultation exercise seeking the views of all interested parties on a proposal to close Raine's School as part of its amalgamation with Oaklands School with effect from 31st August 2020.

2. Consultation period

- 1.5. The consultation period ran from 10 June 2019 until 24 July 2019, and on 3 July 2019 this period was extended to 31 July 2019.
- 1.6. The consultation was published on the consultations page of the LBTH website at https://www.towerhamlets.gov.uk/lgn/council_and_democracy/consultations/consultations.aspx.
- 1.7. The webpage carried information on how to respond, the timetable for responses and made available the formal consultation document (https://www.towerhamlets.gov.uk/Documents/Consultation/Raines_School/Raines-Foundation-Consultation-on-Proposed-Closure.pdf) and a feasibility study on the proposal to enlarge Oaklands School (https://www.towerhamlets.gov.uk/Documents/Consultation/Raines_School/FeasibilityStudyRainesOaklandsReport.pdf).
- 1.8. Two public meetings were held, at Oaklands School on the evening of 19 June 2019 and at Raine's School on the evening of 26 June 2019. The first meeting at Oaklands School was addressed by Debbie Jones, Director of Children's and Culture, Christine McInnes, Divisional Director Education and Partnerships LBTH; Terry Bryan, Service Head Pupil Services and School Sufficiency, LBTH; and Inigo Woolf Director of the London Diocesan Board for School. The second meeting at

Raine's School was addressed by Christine McInnes, Divisional Director Education and Partnerships LBTH; Terry Bryan, Service Pupil Services and School Sufficiency LBTH; Kate Roskell, Secondary and Co-ordinating Adviser, LDBS. The slide presentation was made available at the consultation page of the LBTH website (https://www.towerhamlets.gov.uk/Documents/Consultation/Raines_School/Raines_Public_Meeting.pptx). Minutes of the two meetings are available.

1.9. In addition, the consultation page published answers to 53 frequently asked questions.

2. Responses

2.1. The Council has received:

- a petition with over 3,000 signatures and 324 detailed comments
- 7 emails
- 102 responses to its on-line questionnaire
- 205 responses to its questionnaire from Oaklands students
- A formal response from Raine's School Foundation

2.2. In addition, the matter had been discussed at Full Council, the Council's Children and Education Overview and Scrutiny Sub-committee, and at the two public meetings referred to above.

3. Challenges to the consultation methodology

As well as responding to the consultation, four respondents have also challenged the consultation methodology:

1 complained about the paper version of the questionnaire sent by post to each pupil's home address: the complaint said it lacked an address or an email address or any type of contact information with regards to guidance about the questionnaire for pupils or parents to use. The respondent said, "Every official letter sent must contain contact information, therefore this questionnaire is not lawful". It went on to suggest that the consultation period should be extended to September 2019 to allow publication of the GCSE results and to digest the amendments made to the consultation on 3 July.

1 described the paper version of the questionnaire as "nonsense" and queried how school students could be expected to respond.

1 complained that relevant documents from the Joint Schools Steering Group had not been disclosed before the end of the consultation period; that there was insufficient time to access and digest the minutes of the Raine's Governing Bodies since 2015. This respondent gave notice of a possible judicial review of the process

1 said, "as an ex-Raines pupil and still a local resident, I am appalled at the way that LBTH has treated local parents, pupils and employees with complete disregard and has shown a blatant contempt for the "consultation" process. This is a consultation in name only. LBTH have been shown to be underhand and dishonest throughout and not only should a much-needed local school, such as Raines, remain open, but those behind:

1. the decision to close the school
2. the withholding of important financial information
3. the sham "consultation" process

4. the wasting of public money

should be held to account for their misconduct and dishonesty throughout this whole process. These people are public servants appointed to act in the interests of the local community- not to serve their own political aspirations. Clearly, there is a flaw in the selection process. Shame on all of them.”

4. Overall response

- 4.1. The proposal to close Raine’s School has been met with opposition from Raine’s School Foundation, parents and carers of current students at the school, and from former students and staff. The opposition has made the following points:
- i. Church of England School.
The closure of Raine’s will result in the loss of one of the Borough’s two CofE secondary schools. This resulting reduction of choice available to families seeking a faith school for their child/ren was criticised.
 - ii. History, tradition and former reputation.
Attention was drawn to the 300-year history of Raine’s Foundation School, and to the loss of the traditions and continuity of education provision that would result. This view was most strongly expressed by former students and staff.
 - iii. Assumption that future improvement is not an option for Raine’s.
Several respondents made the point that with sufficient investment, leadership, determination and support from LBTH and LDBS, it may still be possible to halt the decline of Raine’s and to begin to restore its popularity and student numbers.
 - iv. Criticism of LBTH and others for allowing Raine’s School to decline.
Allied to the argument made at point iii. above, several respondents suggested that Raine’s School was being proposed for closure as result of the failings of others, including LBTH. Allegations have been made about LBTH deliberately placing a large number of challenging students at the school
 - v. Deliberate undermining of Raine’s School ahead of the conclusion of the consultation
Complaints were made about the closure of the September 2019 intake and the actions of staff who have discouraged prospective students from choosing Raine’s and encouraged existing students to transfer thus weakening the evidence for Raine’s survival. Lack of marketing and advertising of the school was also criticised
 - vi. Suitability of Oaklands as an alternative for current Raine’s students.
Objections were raised about the standards of student behaviour at Oaklands, with several people referring to violent and aggressive behaviour towards Raine’s students on a recent visit. Others objected to Oaklands being a community, rather than a faith, school
 - vii. The methodology for projecting future student numbers was flawed.
Only first preference numbers were quoted: this is different from likely student admissions due to allocation of second or subsequent preferences for some students; no account was taken of new house building near the school

- viii. The financial history of the school has been misrepresented
Lack of financial viability of the school was claimed as a main reason for the proposed closure, yet evidence to support this has either not been made available, or when accounts have been inspected some respondents have reached a different conclusion
- ix. The strength of Raine's 6th Form has been ignored or underplayed
The Raine's 6th Form is "Good" according to Ofsted, and in 2018 was oversubscribed, yet this strength in the school is ignored in the consultation report, and in the student intake and financial projections
- x. Raine's School Foundation representatives have been unfairly or unlawfully excluded from the management of the school
No Foundation representative was invited to join the IEB in 2018
- xi. The allegation that the motive is to acquire the Raine's School land and buildings and/or to sell them off for development
Some respondents have speculated that the true motive for closing the school is to sell the buildings for residential development; others have pointed out that Raine's School Foundation has an interest in the land and buildings
- xii. There is a clear conflict of interest for the Oaklands headteacher who may not fairly judge the best interests of Raine's School
The supporters of Raine's School do not believe that the senior staff from Oaklands can fairly judge the best interests of Raine's school; there are unsubstantiated allegations that the Oaklands Head Teacher has a pecuniary interest in the proposals
- xiii. No account has been taken of air quality impact on school students
Some respondents say that air quality at Raine's is superior to other locations in the Borough, and that its location adjacent to Victoria Park should be significant factors for the future of children's education
- xiv. Why close a secondary school at the same time as expanding one and opening two schools in other parts of Tower Hamlets
Respondents have challenged the relationship between overall demand for secondary places and demand for places at Raine's School. They suggest that falling demand for places at Raine's might be typical of the whole Borough. Those that concede that there might be a differential demand then go on to argue that it might be better for the public purse to invest in improving Raine's than to close it and invest in expanded or new provision elsewhere

4.2. The opposition was not universal: a minority of respondents agreed with the proposal. They cited the financial circumstances of the school and the low student recruitment as reasons for supporting the proposed closure.

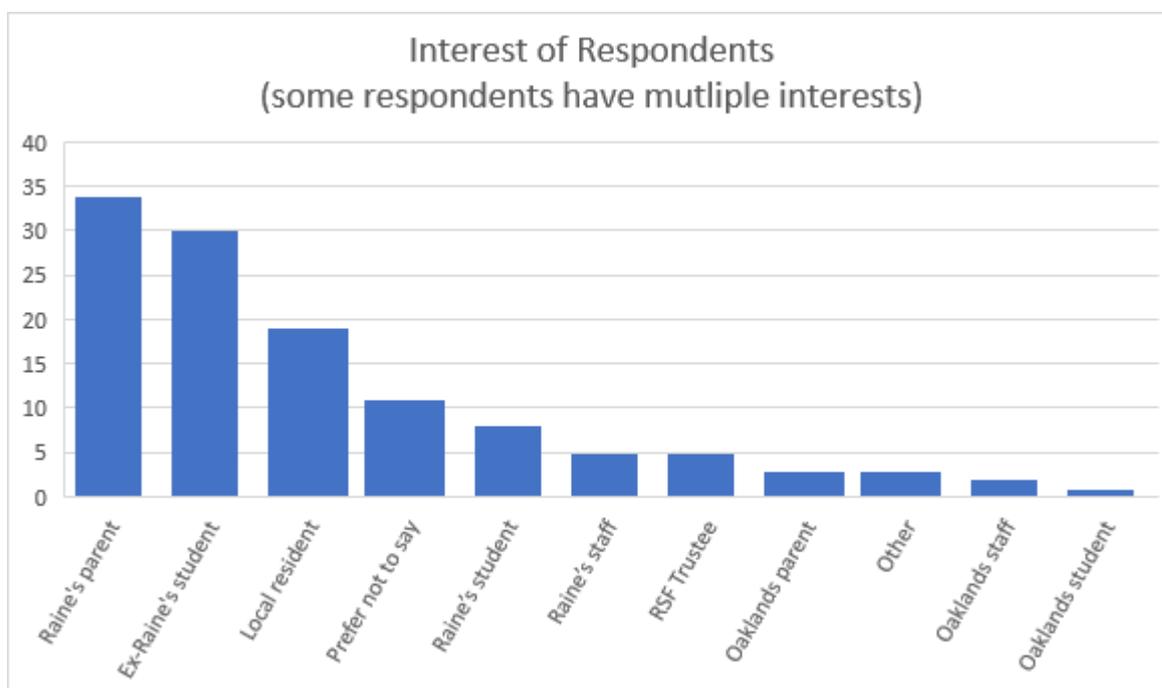
4.3. The proposal to expand Oaklands has also been criticised, in slightly smaller numbers than the opposition to Raine's closure. The following points were made:

- i. Oaklands serves a different community group and integrating the Raine's students will be challenging
- ii. Oaklands is not a CofE school, and so not a suitable replacement capacity

- iii. the Oaklands site is constrained and unsuitable for further expansion
 - iv. the Oaklands site lacks sports and other outdoor facilities
 - v. the behaviour and conduct of Oaklands students has been observed to be violent and aggressive, and therefore not appropriate to be rewarded with further expansion
- 4.4. The proposal to expand Oaklands did receive some support; there was also a group of responses that did not object to the expansion but suggested that great care would need to be taken to manage both the initial transition of Raine's students and the subsequent expansion.
- 4.5. Those opposed to the closure of Raine's and expansion of Oaklands have made several counter suggestions that would keep Raine's open, by:
- i. installing new governors and new senior leadership and investing in an improvement plan, including increased marketing to prospective parents
 - ii. managing it as a smaller school
 - iii. converting it to an academy
 - iv. converting it to a private school
 - v. closing Oaklands and expanding Raine's
 - vi. selling some of the Raine's school land and buildings for re-investment in Raine's
 - vii. retaining the "Raine" name for the future
- 4.6. There were respondents concerned with the impact of the proposals on vulnerable students, including those with special educational need; these responses were more concerned that any changes were handled sensitively than with either opposing or supporting the proposals for Raine's and Oaklands.

5. Profile of on-line questionnaire respondents

- 5.1. One third (34) of the respondents are parents/carers of Raine's students. The second largest group is former staff and students (30), with local residents (19) the third largest group. The chart below includes multiple responses where more than one category applies to a respondent.



5.2. Over two-thirds of the respondents (69.0%) gave their age as 25-64, and just over half of them (53.1%) gave their gender as female

5.3. Ethnicity and Disability profile of respondents

Nearly three-quarters of the respondents (72.7%) said they had no disability, and 6.1% identified themselves as having a limiting health problem or disability.

60.8% described themselves as White British or White Other; those that identified in other ethnic groups (18.8%) were Mixed: White and Black Caribbean; Asian/Asian British: Bangladeshi; or Black/Black British: African.

6. Summary of on-line questionnaire responses

6.1. Analysis of results

102 responses were received via the on-line questionnaire. The 205 responses received from Oaklands School students are analysed separately in paragraph 11 below.

6.2. Responses to consultation questions in numbers

		Yes or Answered	No or Blank	Total
Q1	Name	85	17	102
Q2	e-mail	85	17	102
Q3	Have you read the consultation document	99	3	102
Q4	What is your interest	102	0	40
Q5	Do you have any comments on the proposed closure of Raine's Foundation School	95	7	102
Q6	Do you have any comments about the proposed expansion of Oaklands School	84	18	102
Q7	Do you have any comments about the proposed merger of Raine's Foundation School with Oaklands School, by closing	92	10	102

	Raine's Foundation School and expanding Oaklands School			
Q8	Do you have any alternative suggestions to the options presented in this consultation	82	20	102

6.3. Analysis of comments from questionnaire

Q5 Do you have any comments about the proposed closure of Raine's Foundation School?

Summary of Responses	
Opposed to the proposed closure	84
Support for the proposed closure	6
No objection to the proposed closure	5
No comment either way	7
Summary of comments	
300 years of history – concern about the loss of tradition and recognition that it used to be a good school	39
Concerned about the impact on current students: Oaklands not an acceptable alternative choice; cost of new uniforms	25
Proposals assume that Raine's School cannot be improved; suggestion that with more time, investment and effort the decline could be reversed	21
Wrong for LBTH to respond to its own failures as the school's ultimate managers by blaming others and then proposing its closure	19
Opposed to the loss of a CofE school	18
Concern about the history and future of Raine's Land and buildings, investment, ownership, grants, future uses	16
Objecting to the appearance of the plan without prior notification or consultation	13
Underinvestment or poorly targeted investment in the school has brought about the decline in popularity	12
Lack of availability of reliable financial information; Do not accept the claim of poor financial viability	9
The proposals unfairly favour the future of Oaklands over Raines	9
Blames the decline in popularity on poor marketing, lack of advertising and school staff discouraging potential applicants	8
Specific concern for the impact on students with Special Educational Needs, including deaf or autistic students	6
Raine's location next to a park gives students a clean air benefit not available at other sites	6
"Good" sixth form should not be closed	6
Critical of the calculation of projected pupil numbers: first choices, not likely numbers; no account of new housing development close to the school	6
Understands the proposal to close given the state of the finances and pupil numbers	5
Raine's Foundation Trust not properly involved in the decisions about the school's future	4

Q6 Do you have any comments about the proposed expansion of Oaklands School?

Summary of Responses	
Opposed to the proposed expansion	67
Support for the proposed expansion	8
No objection to the proposed expansion	9
No comment either way	18

Summary of comments	
Wrong choice – general opposition to the expansion	21
Raine's should be expanded and Oaklands should be closed; Oaklands should not be expanded at the expense of Raine's	20
Violence, bullying and general poor student behaviour at Oaklands	12
Expansion is a good idea for Oaklands if the transition is properly financed, managed and supported; care taken with bus routes from E14; appropriate provision for SEN and deaf students	10
Oaklands is not a CofE school	9
Oaklands site not suitable. The school is already at capacity	8
Expansion is an unfair "land grab" designed to benefit Oaklands at Raine's expense; there is a conflict of interest for the Oaklands Head	8
I will choose another school for my child; s/he will not go to Oaklands	7
It makes no sense to expand Oaklands when falling student numbers is the reason for closing Raine's	6
Oaklands serves a different community group and integrating the Raine's students will be challenging	3
Wrong location	1
Residents were not consulted	1

Q7 Do you have any comments about the proposed merger of Raine's Foundation School with Oaklands School, by closing Raine's Foundation School and expanding Oaklands School?

Summary of Responses	
Opposed to the proposed expansion	78
Support for the proposed expansion	5
No objection to the proposed expansion	8
No comment either way	10
Summary of comments	
Oaklands is not a CofE school, Sir John Cass would be a better choice of school to expand	32
300 years of history – concern about the loss of tradition and recognition that it used to be a good school	19
Violence, bullying and general poor student behaviour at Oaklands	13
Poor communications by Raine's IEB in February 2019, and in general by LBTH and LDBS	9
Oaklands serves a different community group and integrating the Raine's students will be challenging	6
I/my son/daughter/grandson will not transfer to Oaklands	6
Proposals assume that Raine's School cannot be improved; suggestion that with more time, investment and effort the decline could be reversed	6
The Raine's site should be kept open	6
Lack of space to expand at Oaklands	4
Expansion is a good idea for Oaklands if the transition is properly financed, managed and supported	3
Poor sports education at Oaklands	1
Deaf provision could be made by re-investing the proceeds of the sale of Raine's site	1
Support for a joint 6 th form	1

Q8 Do you have any alternative suggestions to the options presented in this consultation?

Summary of comments	
----------------------------	--

Keep Raine's School open, but with a different and positive approach	50
Restore Raine's School to its former glory	11
Invest in marketing the school to prospective parents	9
Merge Raine's School with Sir John Cass, as it is a C of E school	9
Keep Raine's School open, but as an academy	6
Keep Raine's School open and close Oaklands instead	5
Allow existing students to finish their exam courses at Raine's School before it closes	4
Keep Raine's School open, but manage it as a smaller school	4
Strengthen Raine's School Governing Body with nominations from local businesses	3
Manage the transition and expansion of Oaklands with care	2
No suggestions: closure of Raine's is the only option	2
Emphasis great sporting facilities and sports education	1
Deaf provision could be made by re-investing the proceeds of the sale of Raine's site	1
Keep Raine's School by privatising it	1
Prioritise pupil's safety	1
Raine's Foundation should be compensated for their investment in the Lower School	1
Stop building new schools or expanding existing schools elsewhere in the borough	1
Merge with Morpeth instead of Oaklands	1
Sell some of the land/buildings for re-investment in the school	1

7. Analysis of the comments in the 7 emails sent to the council

1 from an ex-student and ex-employee opposed the closure on the grounds that there are not enough schools for the number of pupils in the area and that the number of church secondary schools is diminishing.

2 from ex-students opposed the closure without giving any reasons.

1 objecting to the consultation process which is described as a "foregone conclusion"; suggesting that Raine's has "been deliberately run down over a period of years". This respondent goes on to object to the expansion of Oaklands, and suggests that it is "incomprehensible that the Head of Oaklands can be a governor of Raine's, which is a clear conflict of interest"

1 from an ex-student and local resident made the following points:

- Allegations of financial unviability remain unproven
- Allegations of previous financial mismanagement at the school remain unproven
- Local Authority deliberate mismanagement of the school and illegal tactics on the governing body and IEB
- Misleading admissions information
- Removal of choice for Church of England families
- Destruction of a 300-year-old school
- Disregard for cleanest air near any school in the borough
- Potential grab of Trust land and property
- Blatant waste of public money

1 parent of current Raine's student made the following points:

- Call for a public enquiry into LBTH's response to Raine's School's situation over the last 8 years

- Closure is an inappropriate response to Ofsted's "requires improvement" judgement
- Wrong for LBTH to target existing students and encourage them to transfer away from Raine's before the consultation is complete
- Oaklands School senior leadership have a conflict of interest and cannot fairly judge the best interests of Raine's School
- The treatment of Raine's is the opposite of the improvement efforts made at St John's Primary School, which were successful
- LBTH is careless of the 300-year legacy of Henry Raine
- Raine's School is well liked by children and families currently attending, and is serving some children very well

1 respondent made the following points

- Consultation documents confusing, inaccurate, and misleading
- Alleges that LBTH is aware of a history of maladministration, connivance and financial malpractice, referring to the 2017 licensed deficit and management of school funds since 2015
- Questions posed at the second public consultation meeting have gone unanswered
- Oaklands staff have a gross conflict of interest as members of the Raine's IEB and as members of the senior leadership team at both schools. Further it alleges that Raine's School's closure is being facilitated "for the pecuniary and other benefits of the Head Teacher at Oaklands School".
- Alleges that "it is a scandal the way children have been handled with no safeguarding at all".
- Alleges children have been encouraged to leave Raine's using bullying tactics
- Thoughtless and heartless to announce the closure at the start of GCSE exams and during the 300th anniversary celebrations
- Closure of Raine's is proposed at the same time as new secondary schools are proposed to open in other parts of Tower Hamlets: contradiction between a falling rolls argument for the closure of one school, but need expand or open others
- Objects to the proposed expansion of Oaklands: critical of standards of student behaviour at Oaklands; notes the lack of space at Oaklands; suggests Raine's Lower School may not be available; suggests transferring Oaklands students to Raine's instead
- Criticises LBTH for the reduction in choice for those seeking a Church of England school in the borough
- Speculates about LDBS role in the future of Raine's

8. Petition Received

LBTH full council met on 17 July 2019. The following petition was presented:

Petition regarding "Stop the closure of Raines Foundation Secondary School" submitted by Laura Gibson and others.

"Raines Foundation a Church of England Secondary school is facing closure by Tower Hamlets council we are trying to get as many people to sign this petition to stop this from happening.

"Raines is one of the only two Church of England secondary schools in Tower Hamlets it has a long history and has just celebrated its 300th year.

“This proposed closure had not been discussed with parents or some members of staff we was all in the dark until the application was discovered online and shared by many on social media.

“The school has been making significant improvements since September of last year when and Mr Woods became the first executive headmaster however it was known by the council that there was issues for many years and it was not acted on until after the council was already in talks to apply for the closure. The way this has been handled by the local authority is disgraceful. It has caused a huge amount of stress and worry for the students some of whom are in the process of preparing for their GCSEs. The students that had accepted a place in year 7 for this coming September now have to find a new school or join Oaklands Secondary school and the existing students are in limbo until the decision is made on if the closure is to go ahead.

“Raines Foundation has been a part of the community for 300 years and now faces closure please sign to show your support for the school, students and staff so we can try and prevent this from happening.”

The petition has been collecting signatures at <https://www.change.org/p/tower-hamlets-council-stop-the-closure-of-raines-foundation-secondary-school>. It had been signed by 3,190 people at 11:12am 5 August 2019.

Taken from Change.org website at 11:12am 5 August 2019	
Total number of signatures	3,190
Total number of comments left	324
Summary of comments left	
Identifying the signatory as a former pupil; relative or friend of former pupil; former member of staff	130
Save this school	130
300 years of history/don't destroy East End/Tower Hamlets/London heritage	98
Critical of LBTH methods in the management of the school and/or management of the consultation	38
Opposed to all school closures; we/Tower Hamlets need(s) more schools	38
CofE school should be saved	30
Concern for continuing student group and the adverse impact the proposals may have on them	23
Don't sell site for development	15
Former students describing HE/qualifications/career gained after leaving Raine's	8

A comparison of the names left on the change.org petition site and the Tower Hamlets response site revealed 7 names were common to both lists.

Officers prepared a written response to the petition for the Council meeting on 17 July, which is available.

9. Response from Raine's School Foundation Trust

The trustees of Raine's School Foundation have submitted a 9-page response to the consultation setting out their “strong and evidenced objection” to the proposals. The document provides the following summary

SUMMARY OF OBJECTION
• Deliberate exclusion of parents and staff from the 2016 Governing Body.
• Deliberate financial mismanagement and manipulation of school accounting figures.
• Deliberate lack of support by LA & LDBS in publicising Raine's.
• Deliberate failing of our disadvantaged ethnic groups by the LA and LDBS.
• Deliberate and reckless lack of safeguarding in trying to mix Raine's and Oaklands' students without proper, and apparently necessary, intervention.
• Deliberately placing too many students with Child Protection Orders in one school
• Disregard of needs of asthmatic children in the Borough.
• Deliberately persuading Raine's current students to leave before the official consultation, should there be one, has even started.
• Disregard of Trust's opinion.
• Total disregard and misuse of Trust's property to promote Oaklands school
• Deliberate disregard of Henry Raine's 300-year legacy.

10. Other responses received by the Council

10.1. The Council's Children and Education Overview and Scrutiny Sub-committee met on 25 June 2019. Diane Gillespie, on behalf of the campaign to stop the closure of the school, addressed the meeting. Five councillor and four co-opted members of the sub-committee were present. Cllr Hassell (Portfolio Lead for Children, Schools and Young People), Christine McInnes and Terry Bryant were also present and also addressed the meeting and answered questions. The minutes of this meeting are available.

10.2. 205 questionnaires were returned from Oaklands school students. The comments were analysed as follows:

Q5 Do you have any comments about the proposed closure of Raine's Foundation School?

Supported the proposed closure	2
Opposed the proposed closure	11
Posed a question or made a comment that did not reveal support or opposition	12
No comment	180

Q6 Do you have any comments about the proposed expansion of Oaklands School?

Supported the proposed expansion	17
Opposed the proposed expansion	19
Posed a question or made a comment that did not reveal support or opposition	30
No comment	139

Q7 Do you have any comments about the proposed merger of Raine's Foundation School with Oaklands School, by closing Raine's Foundation School and expanding Oaklands School?

Supported the proposed closure and expansion	5
Opposed the proposed closure and expansion	10
Posed a question or made a comment that did not reveal support or opposition	11
No comment	179

Q8 Do you have any alternative suggestions to the options presented in this consultation?

We should add another Oaklands building as big as Cavell	1
Do it after I leave year 11	1
Keep Raine's open and Oaklands should be the way it (is)	1
Keep Oaklands 6th form in the original building as Raine's is too far	1
To send all of Raine's students to another building and keep them separate to Oaklands students as it will cause more problems for everyone I don't see Oaklands students getting along with Raine's students	1
Yes - better teachers for Raine's to keep the students occupied	1
build a new building and let all the Raine's lot inside	1
No comment	198

10.3. In making their comments the most common theme mentioned by Oaklands students was the small size of their school (22). Respondents stated their preference for a small school or feared that the school would become overcrowded. A further 10 responses welcomed the expansion plans saying bigger would be better. A few (5) mentioned the possibility of fights or arguments between the two student groups;

11. Background papers

Written response to petition prepared for the 17 July Council meeting
 Minutes of public meetings held on 19 and 26 June
 Minutes of the Children and Education Overview and Scrutiny Sub-committee held on 25 June 2019

This page is intentionally left blank

Raines -

Appendix 8 Copies of all responses to the public consultation
(https://www.towerhamlets.gov.uk/lgn/council_and_democracy/consultations/Proposal-to-close-Raines-Foundation-School.aspx)

This page is intentionally left blank

School roll projections for Reception

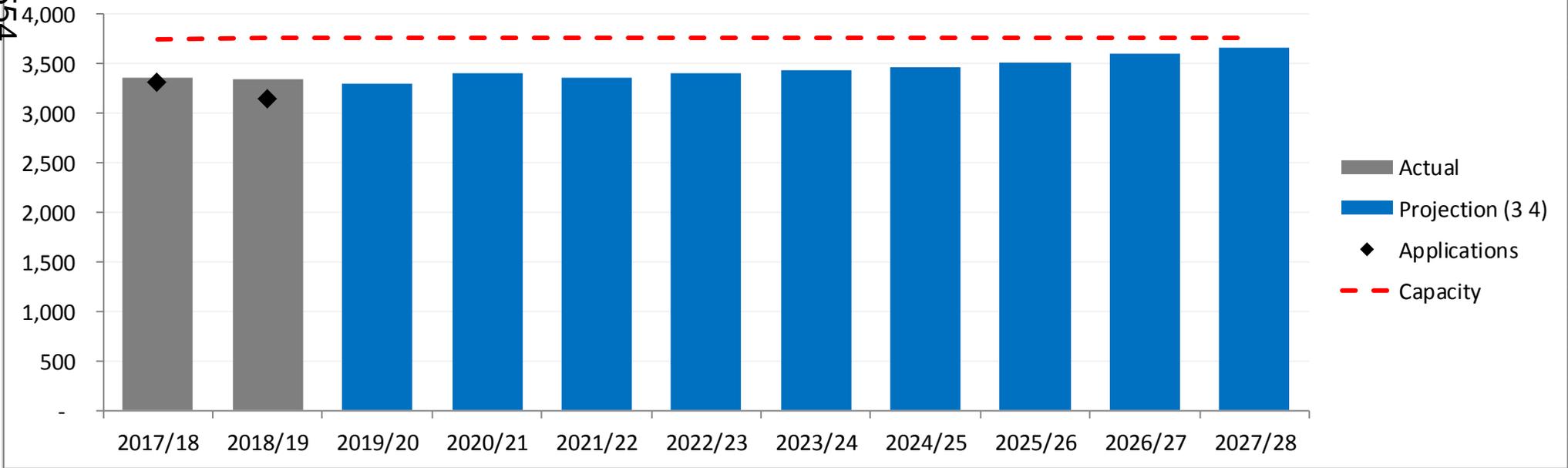
Produced July 19 using: Jan 2019 school rolls, GLA 2016-based population projection model (UPC), and Local Plan + LLDC development trajectory, 3 4 option

Borough

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		3,353	3,340									
Projection (3 4)				3,299	3,403	3,364	3,398	3,436	3,469	3,512	3,606	3,658
Applications		3,305	3,136									
Capacity		3,740	3,766	3,761	3,761	3,761	3,761	3,761	3,761	3,761	3,761	3,761
Variance (3 4)	Pupils	387	426	462	358	397	363	325	292	249	155	103
	FE	12.9	14.2	15.4	11.9	13.2	12.1	10.8	9.7	8.3	5.2	3.4
	%	10%	11%	12%	10%	11%	10%	9%	8%	7%	4%	3%

Page 554

Reception projections: borough



Catchment 1 - Stepney (INCLUDES BOTH BONNER SITES)

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		756	730									
Projection				727	753	716	712	703	696	692	698	699
Capacity		840	840	840	840	840	840	840	840	840	840	840
Variance	Pupils	84	110	113	87	124	128	137	144	148	142	141
	FE	2.8	3.7	3.8	2.9	4.1	4.3	4.6	4.8	4.9	4.7	4.7
	%	10%	13%	13%	10%	15%	15%	16%	17%	18%	17%	17%

Catchment 2 -

Bow

(does not include Bonner sites)

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		390	408									
Projection				366	358	359	358	359	358	359	362	364
Capacity		450	450	450	450	450	450	450	450	450	450	450
Variance	Pupils	60	42	84	92	91	92	91	92	91	88	86
	FE	2.0	1.4	2.8	3.1	3.0	3.1	3.0	3.1	3.0	2.9	2.9
	%	13%	9%	19%	20%	20%	20%	20%	20%	20%	20%	19%

Page 555

Catchment 3 - Poplar

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		842	866									
Projection				846	866	895	914	934	952	968	1,005	1,022
Capacity		885	890	890	890	890	890	890	890	890	890	890
Variance	Pupils	43	24	44	24	- 5	- 24	- 44	- 62	- 78	- 115	- 132
	FE	1.4	0.8	1.5	0.8	- 0.2	- 0.8	- 1.5	- 2.1	- 2.6	- 3.8	- 4.4
	%	5%	3%	5%	3%	-1%	-3%	-5%	-7%	-9%	-13%	-15%

Catchment 4 - Isle of Dogs

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		419	410									
Projection				406	438	449	472	500	527	556	591	617
Capacity		425	425	441	441	441	441	441	441	441	441	441
Variance	Pupils	6	15	35	3	- 8	- 31	- 59	- 86	- 115	- 150	- 176
	FE	0.2	0.5	1.2	0.1	- 0.3	- 1.0	- 2.0	- 2.9	- 3.8	- 5.0	- 5.9
	%	1%	4%	8%	1%	-2%	-7%	-13%	-20%	-26%	-34%	-40%

Catchment 5 - Wapping

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		418	418									
Projection				409	416	402	400	396	392	388	389	388
Capacity		480	480	480	480	480	480	480	480	480	480	480
Variance	Pupils	62	62	71	64	78	80	84	88	92	91	92
	FE	2.1	2.1	2.4	2.1	2.6	2.7	2.8	2.9	3.1	3.0	3.1
	%	13%	13%	15%	13%	16%	17%	18%	18%	19%	19%	19%

Catchment 6 - Bethnal Green

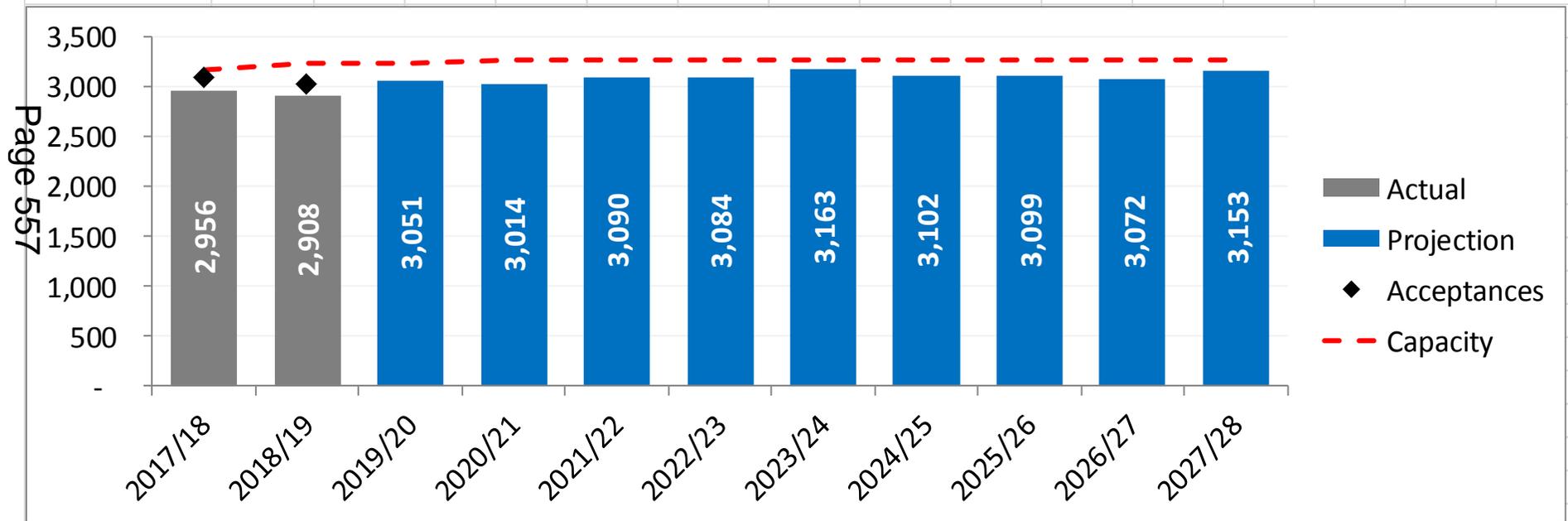
		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual		528	508									
Projection				528	539	517	513	514	513	516	524	529
Capacity		660	660	660	660	660	660	660	660	660	660	660
Variance	Pupils	132	152	132	121	143	147	146	147	144	136	131
	FE	4.4	5.1	4.4	4.0	4.8	4.9	4.9	4.9	4.8	4.5	4.4
	%	20%	23%	20%	18%	22%	22%	22%	22%	22%	21%	20%

School roll projections for Year 7

Produced July 19 using: Jan 2019 school rolls, GLA 2017-based population projection model (UPC), and Local Plan + LLDC development trajectory, 3 4 option

Borough

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Actual	2,956	2,908									
Projection			3,051	3,014	3,090	3,084	3,163	3,102	3,099	3,072	3,153
Acceptances	3,078	3,009									
Capacity	3,152	3,233	3,233	3,263	3,263	3,263	3,263	3,263	3,263	3,263	3,263
Variance	Pupils	196	325	182	249	173	179	100	161	164	191
	FE	6.5	10.8	6.1	8.3	5.8	6.0	3.3	5.4	5.5	6.4
	%	6%	10%	6%	8%	5%	5%	3%	5%	5%	6%



Summary of the School Roll Projection Methodology

Tower Hamlets Council commissions school roll projections through the Greater London Authority (GLA), like most other London boroughs. GLA have access to data on all pupils in London (via the National Pupil Database) which enables them to model movements across borough boundaries in a way that would be difficult for an individual authority.

Projections are run each year in March/April using the following methodology:

- Step 1.** The borough's population is projected based on demographic trends (e.g. births, deaths, and migration) and the borough's housing development trajectory using planning data submitted by the council.
- Step 2.** The flow of pupils from their ward of residence (including those out of borough) to each mainstream state school is determined, based on the Spring School Census and estimates of the number of children living in each ward. These are turned into ratios, for example, one in five Year 1 pupils living in XYZ Ward go to ABC Primary School. These existing ratios are not available for new children entering school in Reception, so these ratios are determined based on previous years.
- Step 3.** The number of pupils in each school is projected by multiplying the flow ratios by the populations in each ward. For example, if one in five Year 1 pupils in XYZ Ward go to ABC Primary School, and it is projected that there will be 100 Year 1 pupils in the ward, then 20 pupils from this ward are expected to go to ABC Primary. The number of pupils from each ward is then added up for each school.
- Step 4.** Projections are aggregated to catchment area and borough-level to improve reliability.
- Step 5.** Validation of pupil numbers and local intelligence checks are made against GLA projections.

Scrutiny on the reliability and accuracy of the pupil forecasting system has taken place over the summer. Historically GLA forecasting has over-estimated the numbers of pupils expected in Reception and Year 7 for medium and long term planning purposes; Tower Hamlet's recent figures fall within the tolerances set by the Department for Education (DfE) for total pupils projected. The main conclusion from the review of the methodology for calculating demand and projections on primary and secondary places is that it is fit for purpose. The overall primary and secondary phase projections are robust and ensure that the local authority is complying with its statutory duty to ensure a school place for every child that wants one, and as far as possible, in the place where they want it.

To further enrich localised planning within the borough, a complementary forecasting system is in development to use in conjunction with the GLA projections. This will be stress tested and put in place to further embed accuracy within the pupil place planning area.

The unprecedented growth in residential developments within LBTH has not, as yet, yielded the number of children expected in our schools. The LA must be mindful and vigilant, should this trend change. Pupil forecasting is just one of a number of tools used to plan for future school demand and much discussion and intelligence sharing between internal departments, the GLA and neighbouring boroughs has taken place to ensure a joined up approach. Pupil forecasting can be skewed significantly in times of change, such as LBTH has experienced during recent years – as such, ongoing scrutiny of patterns of live births, school admissions, pupil migration and flow should be monitored and a flexible place planning strategy put in place to enjoy best value for Tower Hamlet's children, ensuring sufficient school places are in the right place at the right time.

This page is intentionally left blank

Raine's Foundation Church of England School. Financial Position.

Introduction.

1. School funding is allocated on a formula basis with separate allocations for years 7 to 11 and years 12 to 13. Both formulae are mainly determined by numbers on roll; therefore a school with low or falling admissions is likely to experience financial difficulties.

School Budget Share.

2. The School Budget Share is the primary source of funding for Raine's, covering all pupils in years 7 to 11. It is predominantly pupil led; in 2019-20 the budget share was £3.158m of which £2.887m (91.4%) was pupil led. Changes in pupil numbers therefore have a significant impact on the funding available.
3. Recent changes in the budget share are set out in the following table.

Financial Year	Budget Share	Pupil Led	Pupil Numbers Years 7-11 ⁽¹⁾
	£m	£m	
2019-20	3.158	2.887	386
2018-19	3.474	3.249	430
2017-18	3.554	3.331	450
2016-17	4.037	3.782	518
2015-16	4.281	4.008	548

(1) October census preceding the financial year.

4. The projected roll of 223 (years 7 to 11) for September (Paragraph 9.8) indicates a school budget share of £1.93m for 2020-21 (at 2019-20 funding levels). This would fall significantly in future years as larger year groups leave the school and if the fall in applications is not reversed.
5. The Tower Hamlets average budget share for a maintained secondary school (excluding Raines) is £7.197m in a range from £5.132m to £9.405m. If Raines had full cohorts in years 7 to 11 at its planned admissions number its budget share would be £5.880m
6. Larger schools can achieve economies of scale and are better able to offer a full curriculum that may be unsustainable on the budget of a small secondary school.
7. In addition to the budget share the school receives sixth form funding (£0.75m in 19-20 compared with £0.96m in 2015-16), various grants and other contributions; the majority of these funding sources are

determined by pupil and student numbers and will fall as the roll contracts. Total income for preceding years is shown in the next table.

Financial Position – Prior Years.

8. The difference between the school’s income and expenditure is set out in the following table.

	Income ⁽¹⁾	Expenditure	Net ⁽²⁾	Cumulative ⁽²⁾
	£000	£000	£000	£000
2018-19	4,767	5,254	(487)	(910)
2017-18	4,758	5,347	(589)	(423)
2016-17	5,475	5,770	(295)	166
2015-16				461

(1) Excludes LA advances of £250k in 2016-17 and £750k in 2017-18.

(2) Figures in brackets represent a deficit.

9. The in-year deficit in 2018-19 and 2017-18 were both in the region of £0.5m. Regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances are added to those brought forward from previous years giving a cumulative budget deficit at 1 April 2019 of £0.91m.

Financial Position - Future Years.

10. The Scheme for Financing Schools requires the IEB to reduce the in-year expenditure so as not to exceed in-year income; in addition, further reductions are required so as to eliminate the cumulative deficit over no more than three years. This would indicate a year on year reduction in expenditure in the region of £0.5m (on a straight line recovery of the cumulative deficit and at current income levels). Further reductions in roll would require higher levels of saving.
11. The school has produced a financial projection covering the financial years to 2023-24. The projected in-year deficit for 2019-20 is £0.208m, but projected in-year deficits increase to over £1m in 2020-21 before falling to £0.7m by 2023-24.

Previous LA Financial Support.

12. To enable the school to function, the LA has made loans, £250k in 2016-17 and £750k in 2017-18. These are repayable to the LA.
13. The Tower Hamlets Scheme for Financing Schools in force at the time of the advances allowed the LA to make loans to schools with Licensed Deficits¹. Documentation indicates that loan repayments were scheduled to be:

- 2019-20 £180,000

¹ A Licensed Deficit is an agreement between the LA and a governing body that allows a school to set a deficit budget. It should only be allowed when the governing body can demonstrate, through an action plan, that it can bring in-year income and expenditure into balance **and** eliminate the cumulative deficit brought forward. National regulations now limit a permitted deficit to a maximum of three years.

- 2020-21 £220,000
- 2021-22 £275,000
- 2022-23 £325,000

14. A directed revision to schemes by the Secretary of State on 22 March 2018 removed the ability to make loans to schools with Licensed Deficits. The revision does not prevent cash advances being made to prevent overdrafts but does limit the period of a Licensed Deficit to three years.

Licensed Deficit Agreement.

15. A new Licensed Deficit Agreement is required with the IEB within the limits imposed by the Secretary of State and taking account of the likely future of the school. Careful monitoring of the action plan will be needed in order to safeguard the LA's financial position. If a decision is taken to close the school the action plan and monitoring arrangements will be an important element in controlling the final deficit to be met by Tower Hamlets' General Fund.

This page is intentionally left blank

Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose
(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)

Statutory Proposal to close Raine’s CofE Foundation School

This Equalities Impact Assessment concerns the proposal to close Raine’s Foundation School and it therefore considers the effect of the closure on the school community, which includes pupils, parents and staff. There is an opposing view that the school has a significant historical place and reputation in the borough and therefore continued efforts should be made to enable Raine’s to remain open to serve the Church of England (CofE) community. The key points made in favour of the school remaining open, as collated through the informal consultation period, were:

- 1) Concerns about the loss of tradition as Raine’s recently celebrated 300 years of history, as well as the loss of reputation and recognition that it used to be a good school.
- 2) Awareness that Oaklands is not a CofE school, and serves a different community group, thereby integrating Raine’s students could be challenging.
- 3) The contention that the school has made significant improvement and that the school should be given more time for another Ofsted inspection, which would, it is argued, result in the school being placed in a ‘Good’ category.

However, the continuing fall in pupil numbers and the associated impact on the educational and financial viability of the school has led to the conclusion that the School should be considered for closure due to underlying sustainability issues relating to its considerable and unrecoverable budget deficit, very low pupil numbers, and admission patterns that has seen a substantial decline in applications over the previous eight-year period. The School’s position is further exacerbated by it being in Ofsted category of ‘Requiring Improvement’ since November 2015 with below standard GCSE results.

The Local Authority (LA) and London Diocesan Board (Diocese) have had increasing concerns about the long-term sustainability of Raine’s Foundation CE School and how they could work together to secure its future. These concerns were focused on its financial viability, set against a backdrop of declining pupil numbers together with the capacity of the School to improve pupil behaviour, progress and outcomes rapidly. Numbers of pupils enrolled at Raine’s has been steadily declining, from 808 at the January census in 2012, 747 in January 2014, 669 in January 2016 and 520 pupils in January 2019. The current pupil numbers are well below the School’s target of 800 and less than half its planned capacity for 1050 pupils.

In considering ways for Raine’s to secure its future and provide a better quality of education for its pupils, the LA and Diocese considered a range of options, including Raine’s federating with another school or amalgamating with an existing Church of England school. None of these options were considered viable.

It should be noted that, in 2013, the governing body of Raine’s School applied to the Secretary of State for the Department of Education (DfE) to convert to academy status. The application made by the then Chair of Governors was refused by the DfE. In refusing the application the DfE explained that, although Raine’s was rated by Ofsted as a ‘good school with outstanding features’ the rate of pupil progress and GCSE results were below the national standard. There

See Appendix A

Current decision rating



NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

has been no further opportunity for Raine's to convert to academy status, given that what followed was two Ofsted inspections in November 2015 and October 2017, which found that the School was in need of 'requiring improvement' due to its poor governance, leadership and its further decline in pupil progress and standards.

The above activities established that the alternative options for securing a future for Raine's School could not be pursued further. It was therefore necessary for the LA and Diocese to consider a process whereby the School would close. The LA, with agreement of both the governing bodies of Raine's and Oaklands Schools, conducted a feasibility study on arrangements for the closure of Raine's School alongside the expansion of nearby Oaklands School for the transfer of Raine's pupils. Oaklands was chosen because:

- it had effective governance and strong leadership;
- it was in the right geographical location;
- it is popular with local families;
- It is 4FE school with potential to add more capacity through expansion;
- it was well placed to provide a good education to additional pupils.
- It was already providing support to Raine's as part of the LA's earlier intervention plan.

Following the completion of the feasibility study and its findings both school governing bodies, LA officers, and the Diocese determined to seek agreement from the Director of Children's and Culture for the LA to recommend that the Council begin a statutory consultation process (the first of 4 potential stages) that would consider the closure of Raine's School, including the expansion of Oaklands School for the transfer of Raine's pupils. The governing bodies of both schools agreed to establish a joint steering group, with an independent chair, to oversee the process.

A seven-week period of public consultation, including meetings with staff, governors, and parents, along with other interested parties has been undertaken from 10th June to 31st July 2019. The results of the consultation process are available upon request.

The Council must now decide whether to progress to stage 2 and issue a statutory notice and proposal in relation to closing Raine's, after which there would then, at stage 3, be a further period of formal consultation under the Education and Inspections Act 2006.

Please note that the analysis below is conducted to ascertain the likely impacts were the proposal to be approved (at stage 4) after that period of formal consultation. It therefore incorporates an assumption of the same. However, it should not be taken to mean that the Council has made any decision in relation to the same final proposal (at stage 4), which is dependent upon the results of stage 2, and then any stage 3 statutory process under the Education and Inspections Act 2006.

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Conclusion - To be completed at the end of the Equality Analysis process

(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)

Based on the findings of the EA, and the mitigating actions put in place to offset any potential disproportionate impact on any one group, the proposal is robust. The proposal ensures increased equality of opportunity in regards to improved educational outcomes for all Raine's pupils. This should ensure that these pupils will now leave secondary education with improved future career and education options.

EA completed by: Elizabeth Freer

(officer completing the EA)

EA signed off by:

(service manager)

Date signed off:

(approved)

Service area:

SPP

Team name:

Children and Culture

Name and role of the officer completing the EA:

Elizabeth Freer, Strategy and Policy Manager

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The following evidence has been considered:

Engagement evidence

An initial consultation ran from 10th June 2019 until 24th July 2019, although this was extended on 3rd July 2019 to run until 31st July 2019. The consultation was published on the consultations page of the LBTH website, and the webpage contained information on how to respond, the timetable for responses, the formal consultation document and a feasibility study on the proposal. In addition, the consultation page also published answers to 53 frequently asked questions, which were updated as and when appropriate throughout the consultation period.

Two public meetings were held: at Oaklands School on evening 19th June 2019, and at Raine's School on the evening of 26th June 2019. Minutes of these meetings were considered.

The Council has received:

- A petition with over 3,000 signatures and 324 detailed comments
- 7 emails
- 102 responses to its on-line questionnaire
- 205 responses to its questionnaire from Oaklands students

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

- A formal response from Raine's School foundation

Minutes of meetings

Minutes of meetings where the subject of Raine's has been discussed have been considered. This includes, but is not limited to, Full Council, the Children and Education Scrutiny Sub-Committee and aforementioned public meetings.

Other Evidence

Financial position of Raine's Foundation Church of England School

Ofsted reports

Pupil projections

School census data of Raine's, Oaklands and London Borough of Tower Hamlets

Demographic data held on current staff and pupils at Raine's and Oaklands

Witness statements filed within judicial review proceedings challenging the consultation process

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Section 3 – Assessing the Impacts on the Equality Groups

Please refer to the guidance notes and evidence with sources how your proposal impacts upon the equality groups and our Equality Duty (for information on the Public Sector Equality Duty, please refer to guidance notes).

Remember -

You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations, this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

Reports/stats/data can be added as an Appendix.

Page 568

Equality Groups	Impact			Reason(s)
	What impact will the proposal have on specific groups of service users or staff?	Positive	Neutral	
Protected characteristics				
Age	X			<p>Pupils at Raine’s aged 11-18 may be considered “disadvantaged” by the possible disruption caused by changing school during their secondary education, although a mitigating action is in place: this change is proposed to take place between academic years and therefore allow a new start at an appropriate time in each pupil’s yearly academic progression, minimising disruption.</p> <p>There are currently no year 10 or year 12 pupils at Raine’s. Therefore there are no students who would (if the final proposal were approved) change schools, and therefore curriculums, between years in which they were studying for national examinations (GCSEs or A Levels). The other students who would move would not be in a position where they had to switch curriculums at a critical stage in their education, and the current years 11 and 13 would have left. There are no year 7 pupils on roll.</p>

There is a clear benefit for all pupils moving that they would then be able to access “Good” quality sustainable education at other schools in the surrounding area as compared to Raine’s. Currently Raine’s is the only maintained “Requires Improvement” secondary school in the borough, having been judged by Ofsted as such in 2015 and 2017, and is in financial deficit, with falling rolls.

In the national GCSE benchmark of the percentage of pupils achieving grade 5/C or above in English and maths, Raine’s average student score was significantly below the Tower Hamlets and national averages in: 2015/16 (Raine’s average was 35% vs TH average of 63%); 2016/17 (Raine’s 30% vs TH 44%); and in 2017/18 (Raine’s 22% vs TH 44.8%).

Raine’s Progress 8 score is classed as “well below average” at -0.84, putting it in the bottom 13% of schools nationwide. Oaklands’ Progress 8 score is 0.68, in the top 14% of schools in England and classed as “well above average”.

In addition, the declining numbers of students in Raine’s sixth form means the range of subjects offered is restricted. The Department for Education’s recommended minimum size for a viable sixth form is 200 pupils. The number of students in Raine’s Sixth Form for the academic year 2019/20 is approximately 132 pupils, whereas there are 212 pupils in Oaklands’ Sixth Form.

86% of pupils at Raine’s stay in education or employment for at least two terms after Key Stage 4, compared to the LBTH average of 93% and an English average of 94%. For Oaklands’ pupils, it is 94%, above even the LBTH average.

Pupils at Raine’s are also far more likely to be persistently absent from school. As of 2017/19, 17.9% of pupils were persistently absent, as opposed to 7.8% at Oaklands, and an English average of 13.9%.

Therefore, it appears that children within Raine’s of all age groups will receive a higher quality of education at Oaklands, and therefore should academically benefit from moving schools, with improved educational outcomes and increased attendance. This applies with equal force as a consideration to all of the protected characteristics considered below, and should be considered as such.

There will also be an impact on staff at the school, who would be made redundant under the proposal. Their ages are:

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Age band	% of staff
18-29	11%
30-39	23%
40-49	26%
50-59	29%
60-69	9%
70+	3%

The spread of staff across the age bands is fairly even, with those under 30 and above 60 less affected than those aged 30-59, although no age ranges are disproportionately affected. Job application and interview preparation support and training will be given to staff who wish to apply for jobs at other schools. For those staff who are of an age that would wish to explore redundancy options, the council will consider those applications. For staff wishing to apply for roles at Oaklands, they will be considered prior to other applicants. The council will also explore the possibility of ensuring displaced staff at Raine's are guaranteed an interview for jobs at other LBTH maintained schools, should they meet the minimum requirements of the role. Staff will be fully consulted should the proposal move to formal consultation and kept informed as to timelines so as to ensure they have sufficient time to find alternative positions.

There are 43 pupils on roll with identified Special Educational Needs/Disabilities (SEND), 5 of whom have an Education, Health and Care Plan (EHCP). Of the five who have an EHCP, one pupil comes from out of borough and two of them require 121 support. Although children with SEND may be "disadvantaged" by potentially attending a school with more children on roll and/or by the process of moving between schools, there is currently no educational provision which is reserved for pupils with SEND at Raine's.

However, by contrast at Oaklands there is a Special Educational Needs dedicated department that assists students with a range of educational requirements. Support is offered through a range of interventions such as Catch Up Reading, 1:1 literacy sessions, reading groups and provision for behaviour, emotional and social difficulties. Numerous partnerships with outside specialists allow students to navigate school life with confidence and achieve their potential. Post-16, an employability qualification is offered to students with special educational needs to prepare for adulthood and the world of work. There is also an ASDAN Personal and Social Development qualification to help students develop social skills.

Full support and programmes at Oaklands are offered to students with:

- Mild, moderate and severe learning difficulties
- Speech and language difficulties
- Students with Autism

Disability

X

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

- Students with a Hearing of Visual Impairment
- Students with a physical disability and/or mobility issues
- Students with social, emotional and mental health issues
- Students with a range of medical conditions.

Therefore, all pupils with SEND who are currently at Oaklands will be able to access increased support and provision at Oaklands, as all of the different types of need, as broken down below, are catered for:

Number of Pupils	Need
11	SPLD (Specific Learning Difficulty)
8	SEMH
9	C+I (Speech Language and Communication)
5	No specialist assessment (will have received some support but not assessment for SEN)
1	MLD
3	Sensory Impairment (2VI, 1 HI)
2	Physical Disability (denoted as other disability on the register)

Annual Reviews for students with EHCPs have already been brought forward to ensure their needs are being, and will continue to be met. The progress for students with SEND will be regularly reviewed. Support with transitions and integration into Oaklands will be offered by the Parent and Family Support Service.

Some pupils and their families may have to travel further to Oaklands, where provision has been made to accommodate all displaced pupils. This will depend on whether they chose to take the place at Oaklands, as under the proposal it is envisaged they will, or they choose to apply elsewhere. The distance for home to school travel for the 221 pupils in years 7-11 at Raine’s ranges from 0.07 to 13.7 miles. The distance for the same pupils to Oaklands School may be slightly further for some pupils. However, 65% of pupils will have to travel less than 2 miles. For reference, the average school journey for pupils aged 5-16 in England is 2.4 miles, taken over a rolling period from 2013-2017.

For any pupils requiring support with the journey, including those with SEND, school travel support is available for eligible pupils under the Council’s “Travel assistance for children in primary and secondary school” or “Travel assistance for students in further education (16-18 year olds)” policies. Currently, no pupils at Raine’s access transport through the SEND team.

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 572

				<p>During the informal consultation period, some families indicated they lived closer to other local schools than Oaklands or would prefer a different school. Should this proposal enter formal consultation, further understanding of this issue would be explored. It is important to know whether those families had children with SEND at Raine's (or the parents themselves had SEND), thus making a shorter journey preferable, or whether it was the religious or educational provision at other schools that was preferable to those families. Some schools in the surrounding area have vacancies in year groups. Tower Hamlets council has committed to meeting parental preferences for school places, where possible.</p>
Sex	X			<p>With 56% of pupils at Raine's identifying as male, the proposed closure of Raine's would have more of an impact on male pupils, although a minimal one. However, this will be mitigated by the fact that boys at Oaklands achieve better results than boys at Raine's. Only 26% of boys at Raine's achieve grades 5/C in English and Maths at GCSE, compared to 53% of boys at Oaklands.</p> <p>For girls who move to Oaklands from Raine's, there would also be an educational benefit. At Raine's, only a fifth (20%) of girls achieve grades C/5 in English and Maths at GSCE, compared to almost half (48%) at Oaklands. Therefore, both male and female pupils could achieve higher educational outcomes by moving to Oaklands.</p> <p>The addition of Raine's pupils to Oaklands will also result in a more equal spread of gender. Currently, there are more girls than boys at Oaklands (52% vs 48%). This gap would be reduced by the addition of Raine's pupils, with more boys than girls relocating. This should help to ensure a greater balance between the genders.</p> <p>More female staff (59%) than male staff (41%) will be affected at Raine's, owing to the fact that more females are employed and this is normally the case at schools across the borough. As teaching roles are not gender specific, this should not have a disproportionate impact on future employment for female staff. Indeed, at Oaklands, there are also more female staff than male staff, meaning pupils moving from Raine's should not notice any difference.</p>
Gender reassignment		X		No impact identified.
Marriage or civil partnership		X		No impact identified.
Religion or belief		X		Raine's is one of two Church of England secondary schools in Tower Hamlets. 47% of pupils identify as being Christian. This is below the national average as evidenced in the last national census, where 59% of the

				<p>population identify as Christian, but higher than Tower Hamlets’ population (30%).</p> <p>Students at Raine’s receive RE in the curriculum and sit an accredited RS exam. There is a school chaplain. Church walks are held at lunchtime for students and staff, as is weekly communion mass. Students attend weekly assemblies, with an emphasis of a Christian nature. During religious holidays, whole school assemblies and mass celebrations are held, with a whole school church service at the end of term. As Oakland’s is a community school, rather than a faith school, there is currently no comparable provision, but Oaklands have committed to making provision for worship and providing chapel time for Raine’s pupils, if requested, to help them maintain religious observance. Oaklands also provides a Religious Education curriculum.</p> <p>For those pupils who would wish to continue at a faith school, Sir John Cass Foundation is the other CofE school in the area, although there is also Christian provision at Bishop Challoner and Canary Wharf secondary schools. Accessing places at these schools within the borough may result in an increased journey for some pupils:</p> <ul style="list-style-type: none"> • Distance from Raine’s to Sir John Cass: 1.2 miles (Outstanding Ofsted grade). • Distance from Raine’s to Bishop Challoner: 1.5 miles (Girls’ school has an Outstanding Ofsted grade, Boys’s School has a Good Ofsted Grade). • Distance from Raine’s to Canary Wharf College Crossharbour: 4.2 miles (Good Ofsted grade). <p>Sir John Cass, the closest CofE school to Raine’s, has an open admissions criteria, so, as with Raine’s, will have pupils who do not identify as Christian. However, pupils who choose not to attend Oaklands would not be guaranteed to gain a place at Sir John Cass.</p> <p>Provision outside of the borough, at Urswick School in Hackney, has been made available by the Diocese and LA. Priority places will be given to displaced pupils from Raine’s. Urswick is 1.2 miles from Raine’s, so closer than Bishop Challoner and Canary Wharf College Crossharbour, and the same distance as Sir John Cass.</p> <p>Oaklands is non-denominational but has a local vicar on its governing body. The addition of Raine’s pupils to Oaklands would serve to make the provision more religiously diverse. By combining pupils from different backgrounds, ethnicities and religions, Oaklands could act as an exemplar of good practice in the borough. Integrating pupils from different religious backgrounds into the current pupil population at Oaklands may have a beneficial effect in fostering good relations between those in different religious groups and promote social cohesion.</p> <p>Given the disparity in educational results between Oaklands and Raines (as set out above), the proposal would</p>
--	--	--	--	---

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 574

			<p>also have the effect of increasing equality of opportunity for those pupils, both Christian and non-Christian, who attend Raine’s, with those of pupils attending Oaklands, or other higher-performing schools. Currently, all pupils at Raine’s are at an educational disadvantage. In the application for judicial review brought in relation to the consultation on the proposal to issue a statutory notice on the proposal to close Raine’s, it was alleged that there was an “antipathy” of Oaklands pupils towards Raine’s pupils which “may in part be based on faith”. However, there was no evidence in that claim that in relation to Oaklands that there is any <i>religious</i> motivation for any alleged disagreement between pupils.</p> <p>In the same application for judicial review, witness evidence was provided by parents who had moved their children to schools other than Oaklands. It was suggested that Christian pupils did not settle in well to schools in the area. This did not relate to Oaklands and therefore is not directly applicable to the consideration of the proposal on Raine’s and Oaklands.</p> <p>For those pupils who will move to non-faith provision at Oaklands, mitigating actions are laid out in the action plan below.</p> <p>Raine’s is no longer the school of choice for most families with a Christian faith as the proportion of children that have applied from CofE primary schools to Raine’s in the last five years has fallen. In 2015, 22.3% of children transferring from CofE primary schools applied to Raine’s, compared to 14.8% in 2019. This indicates that Christian pupils are predominantly having their needs met through alternative secondary educational provision in the Council’s area rather than Raine’s. Nonetheless, there will be an impact on this prospective secondary school population based on religion, as around 14.8% of pupils moving from CofE primary schools (and also other pupils not currently attending CofE primary schools but seeking to attend a CofE secondary school) will not be able to access a CofE education at Raine’s, although there are alternative options for a Christian education available both in and outside of the borough.</p> <p>The same considerations as set out above in relation to alternative CofE and Christian educational provision apply to these pupils. Having more Christian students in non-denominational schools may also help to foster good relations between different religious groups due to increased interaction, if managed effectively.</p>			
Race		X	<p>31% of pupils at Raine’s are White British, with no other majority ethnicity, so this ethnic group will be impacted the most. Only 3% of students at Oaklands are White British, with the majority of pupils (80%) Bangladeshi. A full breakdown is below:</p> <table border="1" data-bbox="772 1372 1601 1420"> <thead> <tr> <th>Ethnicity</th> <th>Raine's</th> <th>Oaklands</th> </tr> </thead> </table>	Ethnicity	Raine's	Oaklands
Ethnicity	Raine's	Oaklands				

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 575

	Pupils	Pupils
Bangladeshi	7%	80.47%
Black - Congolese	1%	0.00%
Black - Ghanaian	2%	0.00%
Black - Nigerian	2%	0.00%
Black - Somali	4%	3.27%
Black and any other ethnic group	1%	1.87%
Black Caribbean	8%	0.70%
Chinese	0%	0.47%
Indian	0%	0.94%
Information Not Yet Obtained	4%	0.00%
Other Asian	0%	1.29%
Other Black	4%	0.47%
Other Black African	6%	1.75%
Other mixed background	1%	1.29%
Pakistani	0%	0.35%
Portuguese	1%	0.00%
Turkish	2%	0.94%
Vietnamese	1%	0.12%
White - English	33%	3.39%
White + any other Asian	1%	0.82%
White and Black African	1%	0.23%
White and Black Caribbean	7%	0.23%
White Eastern European	3%	0.00%
White European	2%	0.94%
White Other	1%	0.47%
White Western European	1%	0.00%

The Council and leadership at Raine's and Oaklands are cognizant of the different demographics of the two

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 576

			<p>communities and aware that this may present possible challenges in uniting them. However, despite earlier allegations of difficulties between the school communities, there is no evidence that any difficulties experienced were motivated by race following Raine’s parents and pupils visiting the Oaklands site during the summer term (i.e. there were no racial epithets used or reported). It is noted that children can be territorial about their schools for reasons unrelated to protected characteristics under the Equality Act 2010. Mitigating actions are laid out in the action plan below.</p> <p>The Council is aware from the judicial review application referred to above that evidence was submitted by parents who had moved their children to schools other than Oaklands where they were concerned that their child would be in a minority racial group and that this may cause a “distinction” to be made by other pupils This is significantly less likely to happen at Oaklands if a large body of former Raine’s students move at once to the school as opposed to a single student.</p> <p>The Council considers that greater integration of children from different racial groups at Oaklands as compared to Raine’s is likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races to themselves to a greater extent at a formative stage of their personal development. This is particularly so with Bangladeshi pupils , as these are under-represented at Raine’s, and White British pupils, as these are under-represented at Oaklands.</p> <p>As with the impact on other protected characteristics, Oaklands is a higher performing school than Raine’s, therefore enabling a greater percentage of white British pupils to attend there than before is likely to advance equality of opportunity between racial groups, by raising educational attainment opportunity for white British children, and others.</p> <p>Raine’s currently has various schemes with external organisations (from the Raine’s Foundation Trust, which provides scholarships in maths and sports and the opportunity to explore careers in the legal profession). At Oaklands, there will similar, if not more opportunities for Raine’s students. A comprehensive range of extra-curricular activities including sports, film, a “Bank of England” club, spoken word, a project run by the National Theatre and debating are run at lunchtime and afterschool. The Tower Hamlets Education Business Partnership support the school with work experience, which is enhanced by leaders in business supporting pupils in year 11 with interview preparation.</p>
Sexual orientation		X	No impact identified.
Pregnancy or maternity		X	No impact identified.

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Other			
Socio-economic		X	<p>Roughly the same proportion of students at Raine’s and Oaklands qualify for Free School Meals: 69.7% at Raine’s up to 2017/18, and 65% at Oaklands. Therefore, although there may be perceived cultural differences, the social-economic backgrounds of pupils will be broadly the same.</p> <p>Uniform grants will be provided for parents to purchase a new school uniform when this is required. The uniform grant will be in line with the current school clothing grant that is provided for children when they transfer from primary to secondary school, which is currently £110.</p> <p>Raine’s Foundation Trust currently offers scholarships in maths and sports, of which 6 students are in receipt of. The Trust would have to decide whether to continue to offer said scholarships.</p> <p>The Upper School building in Approach Road, E2, is currently rented to an external organisation to run community sports activities outside of school hours. This organisation will be provided with the opportunity to continue to run its provision out of a nearby alternative venue with similar sports facilities. Currently, community groups are able to rent rooms/halls at Raine’s Upper Site for a variety of purposes including, but not limited to, Irish dancing classes, badminton, Queen Mary’s Student Union, church groups and various corporate events. None of these bookings require specialist equipment, and the facilities at Raine’s are replicated in other schools in the borough. Alternative venues would have to be sourced and offered, and could provide a stream of funding for another school or community venue.</p> <p>Comments were received during the consultation process that pupil projections do not take into account the number of new developments being built. However, those developments are not family homes. Therefore, pupil projection numbers, as per the Primary Place Planning report, demonstrate that future demand for places will not be around Bethnal Green. Tower Hamlets’ has a duty to ensure the right provision is in the right place at the right time, in order to give every chance to every child.</p> <p>The air quality at Raine’s and its surroundings is better than other secondary school locations around the borough. However, this has not detracted parents from relocating to other areas in Tower Hamlets, nor prevented them from applying to different secondary schools, thereby suggesting that, when balanced against educational standards, air quality is not a top priority for parents. It is also is not enough of a factor for the LA to reasonably consider as a basis for keeping a school in financial deficit, with a falling roll, open.</p>
Parents/Carers		X	<p>Raine’s Foundation has a proud history as a 300-year provider of education to the children for East London. The LA is aware of the importance of keeping the name of Henry Raine alive in the borough. 34% of respondents to the informal consultation were parents at the school and 30% were ex-students, some of whom were</p>

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

				concerned about the loss of tradition and recognition that Raine's used to be a good school. However, if a decision is ultimately taken to close Raine's, a commitment has been made to the Raine's Foundation Trust by the LA to consider ways in which to preserve to legacy and name of Raine's in Tower Hamlets.
--	--	--	--	--

Section 4 – Statutory Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact on the Council's ability to meet any aspect of the Public Sector Duty as set out in the Equality Act 2010:

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

If the proposed change adversely impacts on the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in Section 5 below.

Page 578

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Section 5 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Example

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. Better collection of feedback, consultation and data sources 2. Non-discriminatory behaviour	1. Create and use feedback forms. Consult other providers and experts 2. Regular awareness at staff meetings. Train staff in specialist courses	1. Forms ready for January 2020 Start consultations Jan 2020 2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	1.NR & PB 2. NR	

Page 5 of 79

Your action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1) Ensuring CofE provision is available at Oaklands and access to Christian education is supported in the Council's area	<ul style="list-style-type: none"> Diocese to work closely with Oaklands to ensure that Raine's pupils receive high quality Religious Education and are supported in their spiritual development outside of lessons. Council to support the same. Council to support pupils attending other Christian schools (within the spare spaces available within the schools PAN for the 	<p>Discussions to begin if the decision is taken to close Raine's. Timetable to be developed later if a formal consultation leads to a decision to close Raine's, as there is sufficient time thereafter to structure and implement (post Spring 2020).</p> <p>Decision on primary to secondary school progression to be made through the offers made in March 2020.</p>		

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 580

	<p>relevant year group) if that is their preference instead of Oaklands. The same applies for current primary school children, who may have otherwise sought to attend Raine’s on the basis of their religion.</p> <ul style="list-style-type: none"> • Council to work with Urswick School in Hackney to ensure that priority places will be given to displaced pupils from Raine’s. 			
<p>2) Action to be taken on promoting cohesion between pupils from Raine’s and Oaklands (in general and in relation to religion and race specifically)</p>	<ul style="list-style-type: none"> • A united approach must be taken by the schools and LA, making clear that any potential joint venture between the schools will move forward with tolerance, respect and cooperation paramount, in line with universal “British Values”. • Meeting between leadership at the Council, Oaklands and Raine’s to discuss best way to communicate with their respective student bodies and set expectations of appropriate behaviour. Leadership to consider sanctions where students do not meet these expectations and other measures to support an equalities culture at the schools. • An organisation called “New 	<p>If proposal agreed</p>		

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

	<p>Direction” will develop a programme of activities for pupils to help build relationships between the two schools.</p> <ul style="list-style-type: none"> • A joint steering group has been set up to oversee progress and arrange for further transition support if required. 			
3) Continue to add to EIA as further data and feedback becomes available	<ul style="list-style-type: none"> • Formal consultation results and responses to be analysed and the EIA to be updated in respect of this analysis, if the Council issues a statutory notice and enters into the formal consultation stage. 	Council to consider matters throughout the formal consultation. EIA to be updated prior to any final decision by the Council on the proposal.		
4) Minimise disruption to students in changing schools	<ul style="list-style-type: none"> • Change under proposal should take effect between academic years which provides a natural break. • Leadership team at Oaklands to organise induction day and/or meetings with Raine’s students to introduce them to new school • A steering group will be set up to oversee progress and arrange for further transition support if required. 	Meetings to take place in summer term 2020, if proposal approved.		
5) Assist Raine’s staff to find alternative	<ul style="list-style-type: none"> • Communicate the decision if made to enable staff to prepare. 	If and when proposal approved.		

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Page 582

<p>employment</p>	<p>After that, then make staff aware of employment opportunities at other schools in the area.</p> <ul style="list-style-type: none"> • Job application and interview support to be offered to all staff. • Council to explore redundancy opportunities for staff who wish to consider retirement. • Council to explore guaranteed interview scheme for Raine's staff. 			
<p>6) Ensure Raine's pupils with SEND experience a smooth transition and receive appropriate support with their education at Oaklands</p>	<ul style="list-style-type: none"> • Annual Reviews to be brought forward • Transition support to be provided by Parent and Family Support Service 	<p>DONE</p> <p>Summer Term 2020</p>	<p>J.O'S</p>	
<p>7) Assist parents / carers integrate with school through parent/ family support programme and existing communication networks</p>	<p>Support schools to engage parents and carers and provide access to information and support pre transfer, during induction and post transition</p> <p>Council (PET) to support schools establish discussion groups / drop-in for parents / carers to support induction</p> <p>Support schools develop 'new school' information / support package for families</p>	<p>Council (PET) to support schools establish discussion groups / drop-in for parents / carers to support induction</p> <p>Support schools develop 'new school' information / support package for families</p>		

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes? X No?

Please state how this will be undertaken.

A steering group has been set up. This group will meet regularly if the proposal is agreed to monitor the progress and impact of the mitigating actions as laid out above.

NOTE: Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

Appendix A

Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank