

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. 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 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.

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 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.

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
[\(\[https://www.towerhamlets.gov.uk/ignl/council_and_democracy/consultations/Proposal-to-close-Raines-Foundation-School.aspx\]\(https://www.towerhamlets.gov.uk/ignl/council_and_democracy/consultations/Proposal-to-close-Raines-Foundation-School.aspx\)\)](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