

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.

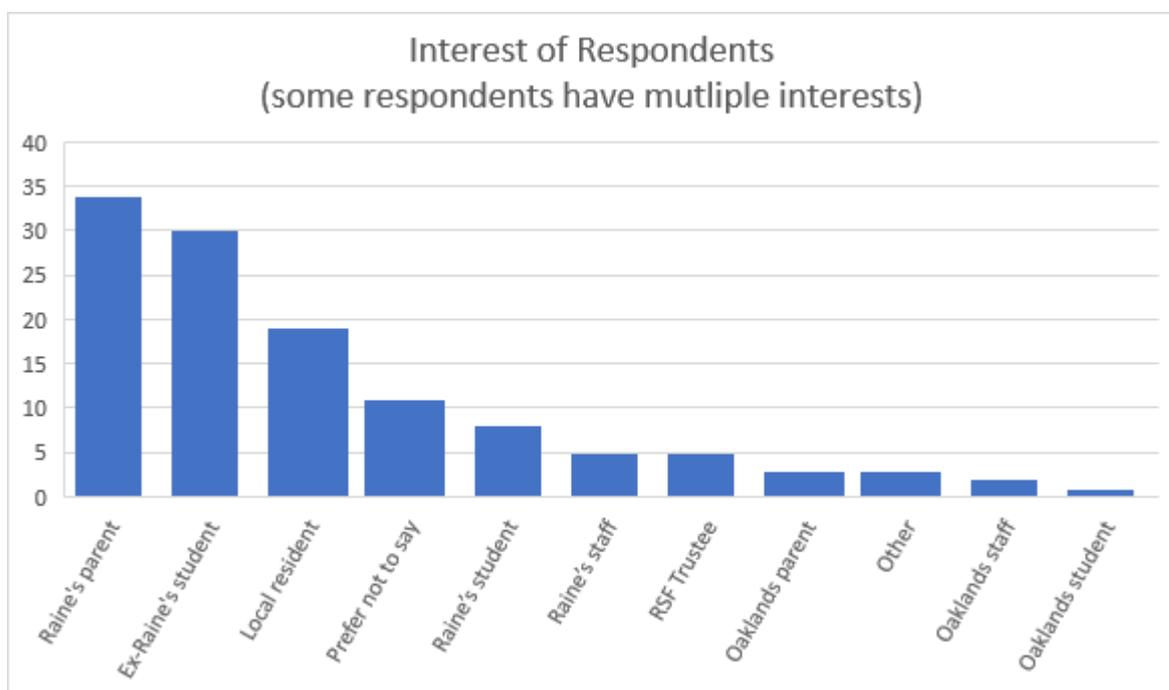
4.3. The proposal to expand Oaklands has also been criticised, in slightly smaller numbers than the opposition to Raine's closure. The following points were made:

- 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	
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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