

Equality Analysis (EA)

Appendix 3

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose
(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)

Statutory Proposal to close Raine’s CofE Foundation School

This Equalities Impact Assessment concerns the proposal to close Raine’s Foundation School and it therefore considers the effect of the closure on the school community, which includes pupils, parents and staff. There is an opposing view that, given the School’s significant historical place and reputation in the borough, there should be continued efforts made to enable Raine’s to remain open to serve the Church of England (CofE) community. The key points made in favour of the school remaining open, as collated through both the informal and formal consultation periods, were:

- 1) Concerns about the loss of tradition as Raine’s recently celebrated 300 years of history, as well as the loss of reputation and recognition of it previously being a highly sought after school.
- 2) Awareness that Oaklands is not a CofE school, and serves a different community group, thereby integrating Raine’s students could be challenging.
- 3) The contention that the school has made significant improvement and that the school should be given more time for another Ofsted inspection, which would, it is argued, result in the school being placed in a ‘Good’ category.

However, the continuing fall in pupil numbers and the associated impact on the educational and financial viability of the school has led to the conclusion that the School should now be considered for closure, given a number of underlying issues that undermine the school’s sustainability. These include the considerable and unrecoverable budget deficit, the current and very low pupil numbers, the admission patterns that have seen a substantial decline in secondary transfer applications over the previous eight-year period. The School’s position is further worsened by it being in the Ofsted category of ‘Requiring Improvement’ since November 2015, with GCSE results that continue to be significantly below the national and Tower Hamlets average.

The Local Authority (LA) formally raised a number of concerns with the Governing Body over several years and the lack of resolution of these matters impacted on the long-term sustainability of Raine’s Foundation CE School. These concerns were focused on its financial viability, set against a backdrop of declining pupil numbers together with the capacity of the School to improve pupil behaviour, progress and outcomes rapidly. Numbers of pupils enrolled at Raine’s has been steadily declining, from 808 at the January census in 2012, 747 in January 2014, 669 in January 2016 and 520 pupils in January 2019. The current pupil numbers of 219 are well below the School’s target of 800 and its planned capacity for a maximum of 1050 pupils.

The LA and London Diocesan Board (Diocese) worked together to try to secure the school’s future. In considering ways for Raine’s to secure its future and provide a better quality of education for its pupils, the LA and Diocese considered a range of options; including Raine’s federating with another school or amalgamating with an existing Church of England school. None of these options were considered viable.

See Appendix A

Current decision rating



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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 (Ms Carole Day) was refused by the DfE. In refusing the application the DfE explained that, although Raine's, at that time, 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 was two Ofsted inspections in November 2015 and October 2017, which found that the School was in need of 'requiring improvement' due to its poor governance, leadership and its further decline in pupil progress and standards.

The factors described above meant that the alternative options for securing a future for Raine's School, academisation or federation, could not be pursued further. It was therefore necessary for the LA and Diocese to consider a process whereby the School would close. The LA, with agreement of both the governing bodies of Raine's and Oaklands Schools, conducted a feasibility study on arrangements for the closure of Raine's School alongside the expansion of nearby Oaklands School for the transfer of Raine's pupils. Oaklands was chosen because:

- it had effective governance and strong leadership;
- it was in the right geographical location;
- it is popular with local families;
- It is 4FE school with potential to add more capacity through expansion;
- it was well placed to provide a good education to additional pupils.
- It was already providing support to Raine's as part of the LA's earlier intervention plan.

Following the completion of the feasibility study and its findings both school governing bodies, LA officers, and the Diocese determined to seek agreement from the Director of Children's and Culture for the LA to recommend that the Council begin a statutory consultation process (the first of 4 potential stages) that would consider the closure of Raine's School, including the expansion of Oaklands School for the transfer of Raine's pupils. The governing bodies of both schools agreed to establish a joint steering group, with an independent chair, to oversee the process.

A seven-week period of public consultation, including meetings with staff, governors, and parents, along with other interested parties was undertaken from 10th June to 31st July 2019. The results of the consultation process are available online.

A report on the outcome of the first stage of the consultation was prepared and presented to Cabinet on 30th October 2019. The Mayor of Tower Hamlets decided to approve the report and recommended that a formal statutory notice was published with the proposal for Raine's Foundation School to close on the 31st August 2020. This meant that the proposal was progressed to the next stage (stage 3) with a four week representation period taking place under the Education and Inspections Act 2006, from Monday 4 November until Monday 2 December 2019 at midnight.

Please note that the analysis below is conducted to ascertain the likely impacts were the proposal to be approved (at stage 4) after that period of formal consultation. It therefore incorporates an assumption of the same. However, it should not be taken to mean that the Council has made any decision in relation to the same final proposal (at stage 4), which is now dependent upon the results of the stage 3 statutory process under the Education and Inspections Act 2006.

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Conclusion - To be completed at the end of the Equality Analysis process

(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)

Based on the findings of the EA, and the mitigating actions put in place to offset any potential disproportionate impact on any one group, the proposal is robust. The proposal ensures increased equality of opportunity in regards to improved educational outcomes for all Raine's pupils. This should ensure that these pupils will now leave secondary education with improved future career and education options.

EA completed by: Elizabeth Freer

(officer completing the EA)

EA signed off by:

(service manager)

Date signed off:

(approved)

Service area:

SPP

Team name:

Children and Culture

Name and role of the officer completing the EA:

Elizabeth Freer, Strategy and Policy Manager

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The following evidence has been considered:

Engagement evidence

An initial consultation ran from 10th June 2019 until 24th July 2019, although this was extended on 3rd July 2019 to run until 31st July 2019. The consultation was published on the consultations page of the LBTH website, and the webpage contained information on how to respond, the timetable for responses, the formal consultation document and a feasibility study on the proposal. In addition, the consultation page also published answers to 53 frequently asked questions, which were updated as and when appropriate throughout the consultation period.

Two public meetings were held: at Oaklands School on evening 19th June 2019, and at Raine's School on the evening of 26th June 2019. Minutes of these meetings were considered.

The Council has received:

- A petition with over 3,000 signatures and 324 detailed comments
- 7 emails

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- 102 responses to its on-line questionnaire
- 205 responses to its questionnaire from Oaklands students
- A formal response from Raine's School foundation

The formal consultation period ran from 4th November to 2nd December 2019, and received 8 responses to the statutory notice, all of which are included in an appendix with contact details redacted. One such response was from the Raine's Foundation Trust. A public meeting to discuss the proposals was held on 11th November 2019 at the Professional Development Centre in Bethnal Green, when more information was shared about how representations could be made and what the next stages in the process are. Minutes of this meeting, as well as responses to questions that arose are included in the further report appendices.

Minutes of meetings

Minutes of meetings where the subject of Raine's has been discussed have been considered. This includes, but is not limited to, Full Council, the Children and Education Scrutiny Sub-Committee and aforementioned public meetings.

Other Evidence

Financial position of Raine's Foundation Church of England School

Ofsted reports

Pupil projections

School census data of Raine's, Oaklands and London Borough of Tower Hamlets

Demographic data held on current staff and pupils at Raine's and Oaklands

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Section 3 – Assessing the Impacts on the Equality Groups

Please refer to the guidance notes and evidence with sources how your proposal impacts upon the equality groups and our Equality Duty (for information on the Public Sector Equality Duty, please refer to section xxx of guidance notes).

Remember -

You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations, this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

Reports/stats/data can be added as an Appendix.

Equality Groups	Impact			Reason(s)
	What impact will the proposal have on specific groups of service users or staff?	Positive	Neutral	
Protected characteristics				
Age	X			<p>Pupils at Raine’s aged 11-18 may be considered “disadvantaged” by the possible disruption caused by changing school during their secondary education, although a mitigating action is in place: this change is proposed to take place between academic years and therefore allow a new start at an appropriate time in each pupil’s yearly academic progression, minimising disruption.</p> <p>There is currently no year 10 or year 12 pupils at Raine’s. Therefore there are no students who would (if the final proposal were approved) change schools, and therefore curriculums, between years in which they were studying for national examinations (GCSEs or A Levels). The other students who would move would not be in a position where they had to switch curriculums at a critical stage in their education, and the current years 11 and 13 would have left. There are no year 7 pupils on roll.</p>

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There is a clear benefit for all pupils moving that they would then be able to access “Good” quality sustainable education at other schools in the surrounding area as compared to Raine’s. Currently Raine’s is the only maintained “Requires Improvement” secondary school in the borough, having been judged by Ofsted as such in 2015 and 2017, and is in financial deficit, with falling rolls.

Representations made during the formal consultation period stated that the school had made considerable improvement and that Ofsted, the regulatory body and sole arbiter of quality were “delighted” with the progress following a monitoring visit in December 2018, following the appointment of an executive headteacher in Summer 2018. The monitoring inspection was carried out under section 8 of the Education Act 2005 and took place because the school received two successive judgements of “Requires Improvement” at its previous section 5 inspections. At the section 5 inspection before the one that took place in November 2015, the school was also judged to Require Improvement.

Ofsted acknowledged in December 2018 that “Senior leaders and the interim executive board (IEB) are taking effective action to tackle the areas requiring improvement identified at the last section 5 inspection in order for the school to become good”, praising the local authority for taking “decisive action to improve the governance of the school...Following the issuing of a warning notice to governors in September 2018.”

A new executive headteacher and interim headteacher were appointed in April 2019 after the previous executive headteacher decided to step down. The new executive headteacher is an experienced headteacher and a designated National Leader of Education, which means she is qualified to provide support to other schools and has acted in this role nationally. She is the current headteacher at Oaklands, and has continued to drive improvements, supported by the interim headteacher. The expertise of both executive headteachers, other leadership such as that provided by the interim headteacher and extensive support provided and funded by the local authority, has meant that provisional GCSE results showed some improvement for Raine’s pupils in 2019, from a very low base.

Despite this, in the national GCSE benchmark of the percentage of pupils achieving grade 5/C or above in English and maths, Raine’s provisional 2019 average student score is still significantly below Oaklands, Tower Hamlets and national averages:

Academic Year	Raine's	Oaklands	TH Average	National Average
2015/16	35	66	63	63
2016/17	30	46	44	43

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2017/18	22	50	44.8	43.3
2018/19	25.7	51.8	45.4	43

Raine’s provisional Progress 8 score for 2019 has improved slightly, from “well below average” at -0.84 in 2018, putting it in the bottom 13% of schools nationwide, to 0.38, now making it “below average”, so in the bottom 19% of schools. Oaklands’ provisional Progress 8 score is 0.66, in the top 15% of schools in England and classed as “well above average”.

Representations made during the statutory notice period were conflicted about the use of Progress 8 scores in the previous EA. One representation stated that the provisional 2019 Progress 8 score indicate that Raine’s has made the “fastest progress in the borough” but then went on to say there should be no direct comparison of Progress 8 attainment scores between Oaklands and Raine’s as “it is an unreliable indicator of school ineffectiveness”. In neither the previous EA, nor this one, have the Progress 8 attainment score comparisons been used as a critical factor in decision making as the LA is cognizant of that issue.

On the government site which allows the public to compare similar schools (ie schools across England where key stage 4 pupils had similar achievement at the end of Key Stage 2 and is based on the results of pupils who finished key stage 4 in July 2018, which is the latest data available), Oaklands is the only Tower Hamlets school which is listed as being a similar school to Raine’s. At the start of yr 7, pupils at both schools have a similar level of achievement. However, by the end of year 11, Raine’s pupils do notably less well than those at Oaklands: <https://www.compare-school-performance.service.gov.uk/school/similar/100979?phase=ks4> in GCSE results. This would suggest that Raine’s pupils would have better outcomes if they attended Oaklands, as they would be under the leadership of the executive headteacher and interim headteacher who have been already improving results at their current school.

Several representations in the statutory consultation period suggested that the sixth form provision at Raine’s has always been considered “Good” by Ofsted and has historically been oversubscribed, with one proposal asking for it to be turned into an academy. A previous application to turn Raine’s into an academy was rejected by the DfE and currently, the declining numbers of students in Raine’s sixth form means the range of subjects offered is restricted. The Department for Education’s recommended minimum size for a viable sixth form is 200 pupils. The number of students in Raine’s Sixth Form for the academic year 2018/19 was approximately 132 pupils, whereas there are 212 pupils in Oaklands’ Sixth Form. Irrespective of the Ofsted grade, the average grade at Raine’s at the end of Key Stage 5 is a D, compared to a C- at Oaklands.

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Upon completion of GCSEs, 86% of pupils at Raine’s stay in education or employment for at least two terms after Key Stage 4, compared to the LBTH average of 93% and an English average of 94%. For Oaklands’ pupils, it is 96%, above even the LBTH average. It should be acknowledged that for those who choose to enter their school’s sixth form, more pupils complete their studies in the sixth form at Raine’s than those at Oaklands – 87% vs 71.7%. This could be owing to the fact that after resitting GCSEs, Oaklands pupils are more likely than Raine’s pupils to achieve the grades needed to transfer to alternative sixth form provision, not attached to their school.

Pupils at Raine’s are also far more likely to be persistently absent from school. As of 2017/18, 17.9% of pupils were persistently absent, as opposed to 7.8% at Oaklands, and an English average of 13.9%. As there are several mentions of issues with bullying at Raine’s in Ofsted reports, a correlation could be drawn between behavioural issues at the school and children not wanted to attend. In addition, in Raine’s governing body minutes from January 18, the Head stated that “there were a number of CP issues which had affected the attendance figures”. Oaklands have a proven track record of addressing attendance issues for vulnerable pupils, as identified in their Ofsted visit report from January 2017, and will therefore be able to use that expertise to support vulnerable pupils from Raine’s, who may transfer.

Therefore, it appears that children within Raine’s of all age groups will receive a higher quality of education at Oaklands, and therefore should academically benefit from moving schools, with improved educational outcomes and increased attendance. This applies with equal force as a consideration to all of the protected characteristics considered below, and should be considered as such, although a detailed breakdown of attainment for different ethnicities is included below.

There will also be an impact on staff at the school, who could be made redundant under the proposal. Their ages are:

Age band	% of staff
18-29	11%
30-39	23%
40-49	26%
50-59	29%
60-69	9%
70+	3%

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				<p>The spread of staff across the age bands is fairly even, with those under 30 and above 60 less affected than those aged 30-59, although no age ranges are disproportionately affected. Job application and interview preparation support and training will be given to staff who wish to apply for jobs at other schools. For those staff that are of an age that would wish to explore redundancy options, the council will consider those applications. For staff wishing to apply for roles at Oaklands, they will be considered prior to other applicants. The council will also explore the possibility of ensuring displaced staff at Raine’s are guaranteed an interview for jobs at other LBTH maintained schools, should they meet the minimum requirements of the role. Staff will be fully consulted should the proposal move to formal consultation and kept informed as to timelines so as to ensure they have sufficient time to find alternative positions.</p>
Disability		X		<p>There are 43 pupils on roll with identified Special Educational Needs/Disabilities (SEND), 5 of whom have an Education, Health and Care Plan (EHCP). Of the five who have an EHCP, one pupil comes from out of borough and two of them require 121 support. Although children with SEND may be “disadvantaged” by potentially attending a school with more children on roll and/or by the process of moving between schools, there is currently no specialist provision that is reserved for pupils with SEND at Raine’s, although a robust SEND policy was updated in October 2019. Therefore, children with SEND at Raine’s who move to Oaklands will not experience a lack of resources or expertise once transitioned.</p> <p>Indeed, at Oaklands there is a dedicated department for Special Educational Needs that assists students with a range of educational requirements. Support is offered through a range of interventions such as Catch Up Reading, 1:1 literacy sessions, reading groups and provision for behaviour, emotional and social difficulties. Numerous partnerships with outside specialists allow students to navigate school life with confidence and achieve their potential. Post-16, an employability qualification is offered to students with special educational needs to prepare for adulthood and the world of work. There is also an ASDAN Personal and Social Development qualification to help students develop social skills.</p> <p>Full support and programmes at Oaklands are offered to students with:</p> <ul style="list-style-type: none"> • Mild, moderate and severe learning difficulties • Speech and language difficulties • Students with Autism • Students with a Hearing of Visual Impairment • Students with a physical disability and/or mobility issues • Students with social, emotional and mental health issues • Students with a range of medical conditions.

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Therefore, all pupils with SEND who are currently at Raine’s will be able to access good support and provision at Oaklands, as all of the different types of need, as broken down below, are catered for:

Number of Pupils	Need
11	SPLD (Specific Learning Difficulty)
8	SEMH
9	C+I (Speech Language and Communication)
5	No specialist assessment (will have received some support but not assessment for SEN)
1	MLD
3	Sensory Impairment (2VI, 1 HI)
2	Physical Disability (denoted as other disability on the register)

Annual Reviews for students with EHCPs have already been brought forward to ensure their needs are being, and will continue to be met. The progress for students with SEND will be regularly reviewed. Support with transitions and integration into Oaklands will be offered by the Parent and Family Support Service.

Some pupils and their families may have to travel further to Oaklands, where provision has been made to accommodate all displaced pupils. This will depend on whether they chose to take the place at Oaklands, as under the proposal it is envisaged they will, or they choose to apply elsewhere. The distance for home to school travel for the 221 pupils in years 7-11 at Raine’s ranges from 0.07 to 13.7 miles. The distance for the same pupils to Oaklands School may be slightly further for some pupils. However, 65% of pupils will have to travel less than 2 miles. For reference, the average school journey for pupils aged 5-16 in England is 2.4 miles, taken over a rolling period from 2013-2017.

For any pupils requiring support with the journey, including those with SEND, school travel support is available for eligible pupils under the Council’s “Travel assistance for children in primary and secondary school” or “Travel assistance for students in further education (16-18 year olds)” policies. Currently, no pupils are Raine’s access transport through the SEND team.

During the consultation period, some families indicated they lived closer to other local schools than Oaklands or would prefer a different school. Should a decision be made for Raine’s to close, further understanding of this issue would be explored. It is important to know whether those families had children with SEND at Raine’s (or the parents themselves had SEND), thus making a shorter journey preferable, or whether it was the

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				religious or educational provision at other schools that was preferable to those families. Some schools in the surrounding area have vacancies in year groups. The council has committed to meeting parental preferences for school places, where possible.
Sex	X			<p>With 56% of pupils at Raine’s identifying as male, the proposed closure of Raine’s would have more of an impact on male pupils, although a minimal one. However, this will be mitigated by the fact that boys at Oaklands achieve better results than boys at Raine’s. Only 26% of boys at Raine’s achieve grades 5/C in English and Maths at GCSE, compared to 53% of boys at Oaklands.</p> <p>For girls who move to Oaklands from Raine’s, there would also be an educational benefit. At Raine’s, only a fifth (20%) of girls achieve grades C/5 in English and Maths at GSCE, compared to almost half (48%) at Oaklands. Therefore, both male and female pupils could achieve higher educational outcomes by moving to Oaklands.</p> <p>The addition of Raine’s pupils to Oaklands will also result in a more equal spread of gender. Currently, there are more girls than boys at Oaklands (52% vs 48%). This gap would be reduced by the addition of Raine’s pupils, with more boys than girls relocating. This should help to ensure a greater balance between the genders.</p> <p>More female staff (59%) than male staff (41%) will be affected at Raine’s, owing to the fact that more females are employed and this is normally the case in schools across the borough. As teaching roles are not gender specific, this should not have a disproportionate impact on future employment for female staff. Indeed, at Oaklands, there are also more female staff than male staff, meaning pupils moving from Raine’s should not notice any difference.</p>
Gender reassignment		X		No impact identified.
Marriage or civil partnership		X		No impact identified.
Religion or belief		X		<p>Raine’s is one of two Church of England secondary schools in Tower Hamlets. 47% of pupils identify as being Christian. This is below the national average as evidenced in the last national census, where 59% of the population identified as Christian, but higher than Tower Hamlets’ population (30%).</p> <p>Students at Raine’s receive RE in the curriculum and sit an accredited RS exam. There is a school chaplain. Church walks are held at lunchtime for students and staff, as is weekly communion mass. Students attend weekly assemblies, with an emphasis of a Christian nature. During religious holidays, whole school assemblies</p>

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				<p>and mass celebrations are held, with a whole school church service at the end of term. As Oaklands is a community school, rather than a faith school, there is currently no comparable provision, but Oaklands have committed to making provision for worship and providing chapel time for Raine’s pupils, if requested, to help them maintain religious observance. Oaklands also provides a Religious Education curriculum.</p> <p>For those pupils who would wish to continue at a faith school, Sir John Cass Foundation is the other CofE school in the area, although there is also Christian provision at Bishop Challoner and Canary Wharf secondary schools. One representation received during the formal consultation expressed that Bishop Challoner, being a Roman Catholic school, was not a suitable substitute for parents seeking a Church of England School. However, 30 pupils have already transferred there, and another 7 to Canary Wharf College, which has a Christian ethos and allocates up to 50% of its places on a faith basis.</p> <p>Accessing places at these schools within the borough may result in an increased journey for some pupils:</p> <ul style="list-style-type: none">• Distance from Raine’s to Sir John Cass: 1.2 miles (Outstanding Ofsted grade).• Distance from Raine’s to Bishop Challoner: 1.5 miles (Girls’ school has an Outstanding Ofsted grade, Boys’ School has a Good Ofsted Grade).• Distance from Raine’s to Canary Wharf College Crossharbour: 4.2 miles (Good Ofsted grade). <p>Sir John Cass, the closest CofE school to Raine’s, has an admissions criteria that is mostly open to all faiths, so, as with Raine’s, will have pupils who do not identify as Christian. However, pupils who choose not to attend Oaklands would not be guaranteed to gain a place at Sir John Cass. Five pupils have transferred there already.</p> <p>Provision outside of the borough, at Urswick School in Hackney, has been made available by the Diocese and LA. Priority places will be given to displaced pupils from Raine’s who meet the School’s Christian faith criteria. Urswick is 1.2 miles from Raine’s, so closer than Bishop Challoner and Canary Wharf College Crossharbour, and the same distance as Sir John Cass. Two Raine’s pupils have transferred there.</p> <p>Oaklands is non-denominational but has a local vicar on its governing body. The addition of Raine’s pupils to Oaklands would serve to make the provision more religiously diverse. By combining pupils from different backgrounds, ethnicities and religions, Oaklands could act as an exemplar of good practice in the borough. Integrating pupils from different religious backgrounds into the current pupil population at Oaklands may have a beneficial effect in fostering good relations between those in different religious groups and promote social cohesion.</p>
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Given the disparity in educational results between Oaklands and Raines (as set out above), the proposal would also have the effect of increasing equality of opportunity for those pupils, both Christian and non-Christian, who attend Raines, with those of pupils attending Oaklands, or other higher-performing schools. Currently, all pupils at Raines are at an educational disadvantage. In the application for judicial review brought in relation to the consultation on the proposal to issue a statutory notice on the proposal to close Raines, it was alleged that there was an "antipathy" of Oaklands pupils towards Raines pupils which "may in part be based on faith". However, there was no evidence to support that claim that, in relation to Oaklands, there is any *religious* motivation for any alleged disagreement between pupils.

In the same application for judicial review, witness evidence was provided by parents who had moved their children to schools other than Oaklands. It was suggested that Christian pupils did not settle in well to schools in the area. This did not relate to Oaklands and therefore is not directly applicable to the consideration of the proposal on Raines and Oaklands. Infact, the headteacher at Oaklands has written to all the schools that have received Raines pupils asking to visit and meet with said pupils. Subsequent reports indicate they have settled in well, as have pupils from Raines who are at Oaklands. The headteacher regularly meets with those pupils and has received positive feedback from their parents. The one incident of bullying that has been reported directly to the LA was effectively dealt with, as the parent of the child involved confirmed she was satisfied with the action taken.

For those pupils who will move to non-faith provision at Oaklands, mitigating actions are laid out in the action plan below.

For most families of a Christian faith, Raines is no longer the school of choice as the proportion of children that have applied from CofE primary schools to Raines in the last five years has fallen. In 2015, 22.3% of children transferring from CofE primary schools applied to Raines, compared to 14.8% in 2019. This indicates that Christian pupils are predominantly having their needs met through alternative secondary educational provision in the Council's area rather than Raines. Nonetheless, there will be an impact on this prospective secondary school population based on religion, as around 14.8% of pupils moving from CofE primary schools (and also other pupils not currently attending CofE primary schools but seeking to attend a CofE secondary school) will not be able to access a CofE education at Raines, although there are alternative options for a Christian education available both in and outside of the borough.

The same considerations as set out above in relation to alternative CofE and Christian educational provision apply to these pupils. Having more Christian students in non-denominational schools may also help to foster good relations between different religious groups due to increased interaction, if managed effectively.

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Race		X	<p>31% of pupils at Raine’s are White British, with no other majority ethnicity, so this ethnic group will be impacted the most. Only 3% of students at Oaklands are White British, with the majority of pupils (80%) Bangladeshi. A full breakdown is below:</p> <table border="1" data-bbox="772 331 1601 1434"> <thead> <tr> <th data-bbox="772 331 1198 406">Ethnicity</th> <th data-bbox="1198 331 1388 406">Raine's Pupils</th> <th data-bbox="1388 331 1601 406">Oaklands Pupils</th> </tr> </thead> <tbody> <tr> <td data-bbox="772 406 1198 451">Bangladeshi</td> <td data-bbox="1198 406 1388 451">7%</td> <td data-bbox="1388 406 1601 451">80.47%</td> </tr> <tr> <td data-bbox="772 451 1198 496">Black - Congolese</td> <td data-bbox="1198 451 1388 496">1%</td> <td data-bbox="1388 451 1601 496">0.00%</td> </tr> <tr> <td data-bbox="772 496 1198 541">Black - Ghanaian</td> <td data-bbox="1198 496 1388 541">2%</td> <td data-bbox="1388 496 1601 541">0.00%</td> </tr> <tr> <td data-bbox="772 541 1198 585">Black - Nigerian</td> <td data-bbox="1198 541 1388 585">2%</td> <td data-bbox="1388 541 1601 585">0.00%</td> </tr> <tr> <td data-bbox="772 585 1198 630">Black - Somali</td> <td data-bbox="1198 585 1388 630">4%</td> <td data-bbox="1388 585 1601 630">3.27%</td> </tr> <tr> <td data-bbox="772 630 1198 675">Black and any other ethnic group</td> <td data-bbox="1198 630 1388 675">1%</td> <td data-bbox="1388 630 1601 675">1.87%</td> </tr> <tr> <td data-bbox="772 675 1198 719">Black Caribbean</td> <td data-bbox="1198 675 1388 719">8%</td> <td data-bbox="1388 675 1601 719">0.70%</td> </tr> <tr> <td data-bbox="772 719 1198 764">Chinese</td> <td data-bbox="1198 719 1388 764">0%</td> <td data-bbox="1388 719 1601 764">0.47%</td> </tr> <tr> <td data-bbox="772 764 1198 809">Indian</td> <td data-bbox="1198 764 1388 809">0%</td> <td data-bbox="1388 764 1601 809">0.94%</td> </tr> <tr> <td data-bbox="772 809 1198 853">Information Not Yet Obtained</td> <td data-bbox="1198 809 1388 853">4%</td> <td data-bbox="1388 809 1601 853">0.00%</td> </tr> <tr> <td data-bbox="772 853 1198 898">Other Asian</td> <td data-bbox="1198 853 1388 898">0%</td> <td data-bbox="1388 853 1601 898">1.29%</td> </tr> <tr> <td data-bbox="772 898 1198 943">Other Black</td> <td data-bbox="1198 898 1388 943">4%</td> <td data-bbox="1388 898 1601 943">0.47%</td> </tr> <tr> <td data-bbox="772 943 1198 987">Other Black African</td> <td data-bbox="1198 943 1388 987">6%</td> <td data-bbox="1388 943 1601 987">1.75%</td> </tr> <tr> <td data-bbox="772 987 1198 1032">Other mixed background</td> <td data-bbox="1198 987 1388 1032">1%</td> <td data-bbox="1388 987 1601 1032">1.29%</td> </tr> <tr> <td data-bbox="772 1032 1198 1077">Pakistani</td> <td data-bbox="1198 1032 1388 1077">0%</td> <td data-bbox="1388 1032 1601 1077">0.35%</td> </tr> <tr> <td data-bbox="772 1077 1198 1121">Portuguese</td> <td data-bbox="1198 1077 1388 1121">1%</td> <td data-bbox="1388 1077 1601 1121">0.00%</td> </tr> <tr> <td data-bbox="772 1121 1198 1166">Turkish</td> <td data-bbox="1198 1121 1388 1166">2%</td> <td data-bbox="1388 1121 1601 1166">0.94%</td> </tr> <tr> <td data-bbox="772 1166 1198 1211">Vietnamese</td> <td data-bbox="1198 1166 1388 1211">1%</td> <td data-bbox="1388 1166 1601 1211">0.12%</td> </tr> <tr> <td data-bbox="772 1211 1198 1256">White - English</td> <td data-bbox="1198 1211 1388 1256">33%</td> <td data-bbox="1388 1211 1601 1256">3.39%</td> </tr> <tr> <td data-bbox="772 1256 1198 1300">White + any other Asian</td> <td data-bbox="1198 1256 1388 1300">1%</td> <td data-bbox="1388 1256 1601 1300">0.82%</td> </tr> <tr> <td data-bbox="772 1300 1198 1345">White and Black African</td> <td data-bbox="1198 1300 1388 1345">1%</td> <td data-bbox="1388 1300 1601 1345">0.23%</td> </tr> <tr> <td data-bbox="772 1345 1198 1390">White and Black Caribbean</td> <td data-bbox="1198 1345 1388 1390">7%</td> <td data-bbox="1388 1345 1601 1390">0.23%</td> </tr> <tr> <td data-bbox="772 1390 1198 1434">White Eastern European</td> <td data-bbox="1198 1390 1388 1434">3%</td> <td data-bbox="1388 1390 1601 1434">0.00%</td> </tr> </tbody> </table>	Ethnicity	Raine's Pupils	Oaklands Pupils	Bangladeshi	7%	80.47%	Black - Congolese	1%	0.00%	Black - Ghanaian	2%	0.00%	Black - Nigerian	2%	0.00%	Black - Somali	4%	3.27%	Black and any other ethnic group	1%	1.87%	Black Caribbean	8%	0.70%	Chinese	0%	0.47%	Indian	0%	0.94%	Information Not Yet Obtained	4%	0.00%	Other Asian	0%	1.29%	Other Black	4%	0.47%	Other Black African	6%	1.75%	Other mixed background	1%	1.29%	Pakistani	0%	0.35%	Portuguese	1%	0.00%	Turkish	2%	0.94%	Vietnamese	1%	0.12%	White - English	33%	3.39%	White + any other Asian	1%	0.82%	White and Black African	1%	0.23%	White and Black Caribbean	7%	0.23%	White Eastern European	3%	0.00%
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White European	2%	0.94%
White Other	1%	0.47%
White Western European	1%	0.00%

The Council and leadership at Raine’s and Oaklands are cognizant of the different demographics of the two communities and aware that this may present possible challenges in uniting them. However, despite earlier allegations of difficulties between the school communities, there is no evidence that any difficulties experienced were motivated by race following Raine’s parents and pupils visiting the Oaklands site during the summer term (i.e. there were no racial epithets used or reported). It is noted that children can be territorial about their schools for reasons unrelated to protected characteristics under the Equality Act 2010. Mitigating actions are laid out in the action plan below.

The Council is aware from the judicial review application referred to above that evidence was submitted by parents who had moved their children to schools other than Oaklands where they were concerned that their child would be in a minority racial group and that this may cause a “distinction” to be made by other pupils This is significantly less likely to happen at Oaklands if a large body of former Raine’s students move at once to the school as opposed to a single student, although white British children will still be one of the minorities at Oaklands, just as Bangladeshi children are at Raine’s.

The Council considers that greater integration of children from different racial groups at Oaklands as compared to Raine’s is likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races to themselves to a greater extent at a formative stage of their personal development. This is particularly so with Bangladeshi pupils, as these are under-represented at Raine’s, and White British pupils, as these are under-represented at Oaklands.

As with the impact on other protected characteristics, Oaklands is a higher performing school than Raine’s. Enabling a greater percentage of white British pupils to attend there than before is likely to advance equality of opportunity between racial groups, by raising educational attainment opportunity for white British children, and others. Several representations made during the formal consultation process suggested there was a lack of evidence in the previous EA about academic outcomes in relation to race. It was stated that white British and/or “black/Caribbean” children are disadvantaged academically, whereas Bangladeshi children are amongst the highest attainers, and that by “trying to move Raine’s children you will succeed in hiding them”. As all key outcome data, for example GCSE results, is analysed by ethnic group and other factors such as free school meals eligibility to enable school staff to undertake targeted work to raised standards, this seems unlikely.

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				<p>As stated under “Age”, Raine’s and Oaklands are similar secondary schools in the sense that their pupils, irrespective of ethnicity, have a similar starting point when they begin in year 7. Therefore, the difference in attainment at the end of year 11 must, in some part, be due to the school they attend and the quality of teaching they received. By moving Raine’s pupils to higher performing schools, such as Oaklands, rather than “hiding them”, those pupils will receive a better quality education, thereby allowing them the opportunity to achieve as well as their peers, of any ethnicity, and buck the national trend. Ofsted recognised this in Oaklands’ report from January 2017: “disadvantaged pupils, including the most able disadvantaged pupils, make good and often better progress than that of pupils with similar starting points in other schools”.</p> <p>Raine’s currently has various schemes in place with external organisations which provide additional resources, such as the Raine’s Foundation Trust, which provides bursaries for further and higher education and through international law firms, the opportunity to explore careers in the legal profession. At Oaklands, there will be similar, if not more opportunities for Raine’s students. A comprehensive range of extra-curricular activities including sports, film, a “Bank of England” club, spoken word, a project run by the National Theatre and debating clubs are run at lunchtime and afterschool. The Tower Hamlets Education Business Partnership support the school with work experience, which is enhanced by leaders in business supporting pupils in year 11 with interview preparation.</p>
Sexual orientation		X		No impact identified.
Pregnancy or maternity		X		The school’s HR provider and LA are monitoring staff on or likely to go on maternity leave to ensure their rights are protected during any change process.
Other				
Socio-economic		X		<p>Roughly the same proportion of students at Raine’s and Oaklands qualify for Free School Meals: 69.7% at Raine’s up to 2017/18, and 65% at Oaklands. Therefore, although there may be perceived cultural differences, the social-economic backgrounds of pupils will be broadly the same. However, FSM pupils at Oaklands have better opportunities than those at Raine’s: 70% vs 42% go onto higher education and 14% vs 11% get into Russell Group Universities.</p> <p>Uniform grants will be provided for parents to purchase a new school uniform when this is required. The uniform grant will be in line with the current school clothing grant that is provided for children when they transfer from primary to secondary school, which is currently £110.</p> <p>Raine’s Foundation Trust currently offers a bursary scheme. The Trust would have to decide whether to continue to offer said scheme to transferred pupils.</p>

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				<p>The Upper School building in Approach Road, E2, is currently rented to an external organisation to run community sports activities outside of school hours. This organisation will be provided with the opportunity to continue to run its provision out of a nearby alternative venue with similar sports facilities. Currently, community groups are able to rent rooms/halls at Raine’s Upper Site for a variety of purposes including, but not limited to, Irish dancing classes, badminton, Queen Mary’s Student Union, church groups and various corporate events. None of these bookings require specialist equipment, and the facilities at Raine’s are replicated in other schools in the borough. Alternative venues would have to be sourced and offered, and could provide a stream of funding for another school or community venue.</p> <p>Comments were received during the consultation process that pupil projections do not take into account the number of new housing developments being built in the locality. However, those developments are not family homes. Therefore, pupil projection numbers, as per the School Places Planning report, demonstrate that future demand for places will not be around Bethnal Green. Tower Hamlets’ has a duty to ensure the right provision is in the right place at the right time, in order to give every chance to every child.</p> <p>The air quality at Raine’s and its surroundings, which include trees and a park, is better than other secondary school locations around the borough. However, this has not detracted parents from relocating to other areas in Tower Hamlets, nor prevented them from applying to different secondary schools, thereby suggesting that, when balanced against educational standards, air quality is not the top priority for parents. It is also is not enough of a factor for the LA to reasonably consider as a basis for keeping an underperforming school in financial deficit, with a falling roll, open.</p>
Parents/Carers		X		<p>Raine’s Foundation has a proud history as a 300-year provider of education to the children for East London. The LA is aware of the importance of keeping the name of Henry Raine alive in the borough. 34% of respondents to the informal consultation were parents at the school and 30% were ex-students, some of whom were concerned about the loss of tradition and recognition that Raine’s used to be a good school.</p> <p>However, if a decision is ultimately taken to close Raine’s, a commitment has been made to the Raine’s Foundation Trust by the LA to consider ways in which to preserve to legacy and name of Raine’s in Tower Hamlets.</p>

Section 4 – Statutory Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact on the Council’s ability to meet any aspect of the Public Sector Duty as set out in the Equality Act 2010:

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Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

If the proposed change adversely impacts on the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in Section 5 below.

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Section 5 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Example

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. Better collection of feedback, consultation and data sources 2. Non-discriminatory behaviour	1. Create and use feedback forms. Consult other providers and experts 2. Regular awareness at staff meetings. Train staff in specialist courses	1. Forms ready for January 2020 Start consultations Jan 2020 2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	1.NR & PB 2. NR	

Your action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1) Ensuring the unique aspects of Anglican school provision is available at Oaklands and access to Christian education is supported in the Council's area	<ul style="list-style-type: none"> Diocese to work closely with Oaklands to ensure that Raine's pupils receive high quality Religious Education and are supported in their spiritual development outside of lessons. Council to support the same. Council to support pupils attending other Christian schools (within the spare spaces available within the schools PAN for the 	<p>Discussions to begin if the decision is taken to close Raine's. Timetable to be developed later if a formal consultation leads to a decision to close Raine's, as there is sufficient time thereafter to structure and implement (post Spring 2020).</p> <p>Decision on primary to secondary school progression to be made through the offers made in March 2020.</p>	VARIOUS	

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	<p>relevant year group) if that is their preference instead of Oaklands. The same applies for current primary school children, who may have otherwise sought to attend Raine’s on the basis of their religion.</p> <ul style="list-style-type: none"> • Council to work with Urswick School in Hackney to ensure that priority places will be given to displaced pupils from Raine’s. 			
<p>2) Action to be taken on promoting cohesion between pupils from Raine’s and Oaklands (in general and in relation to religion and race specifically)</p>	<ul style="list-style-type: none"> • A united approach must be taken by the schools and LA, making clear that any potential joint venture between the schools will move forward with tolerance, respect and cooperation paramount, in line with universal “British Values”. • Meeting between leadership at the Council, Oaklands and Raine’s to discuss best way to communicate with their respective student bodies and set expectations of appropriate behaviour. Leadership to consider sanctions where students do not meet these expectations and other measures to support an equalities culture at the schools. • An organisation called “New 	<p>If proposal agreed</p>	<p>VARIOUS</p>	

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	<p>Direction” will develop a programme of activities for pupils to help build relationships between the two schools.</p> <ul style="list-style-type: none"> • A joint steering group has been set up to oversee progress and arrange for further transition support if required. 			
<p>3) Continue to add to EIA as further data and feedback becomes available</p>	<ul style="list-style-type: none"> • Formal consultation results and responses to be analysed and the EIA to be updated in respect of this analysis, if the Council issues a statutory notice and enters into the formal consultation stage. 	<p>Council to consider matters throughout the formal consultation. EIA to be updated prior to any final decision by the Council on the proposal.</p>	<p>EF</p>	
<p>4) Minimise disruption to students in changing schools</p>	<ul style="list-style-type: none"> • Change under proposal should take effect between academic years which provides a natural break. • Leadership team at Oaklands to organise induction day and/or meetings with Raine’s students to introduce them to new school • A steering group will be set up to oversee progress and arrange for further transition support if required. 	<p>Meetings to take place in summer term 2020, if proposal approved.</p>	<p>Steering group</p>	
<p>5) Assist Raine’s staff to find alternative</p>	<ul style="list-style-type: none"> • Communicate the decision if made to enable staff to prepare. 	<p>If and when proposal approved.</p>	<p>HR</p>	

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<p>employment</p>	<p>After that, then make staff aware of employment opportunities at other schools in the area.</p> <ul style="list-style-type: none"> • Individual professional development plans agreed with staff supported by a range of professional development opportunities. • Job application and interview support to be offered to all staff. • IEB to adopt the council's Redeployment Policy and support staff to apply for vacant posts in other LA schools. • Council to explore redundancy opportunities for staff who wish to consider retirement. • Council to explore guaranteed interview scheme for Raine's staff. 			
<p>6) Ensure Raine's pupils with SEND experience a smooth transition and receive appropriate support with their education at Oaklands</p>	<ul style="list-style-type: none"> • Annual Reviews to be brought forward • Transition support to be provided by Parent and Family Support Service • Individual transition plans being developed in discussion with staff and parents 	<p>DONE</p> <p>Summer Term 2020</p>	<p>J.O'S</p>	
<p>7) Assist parents / carers integrate with school through parent/ family support programme and existing communication networks</p>	<p>Support schools to engage parents and carers and provide access to information and support pre transfer, during induction and post transition</p> <p>Council (PET) to support schools establish discussion groups / drop-in for parents /</p>	<p>Council (PET) to support schools establish discussion groups / drop-in for parents / carers to support induction</p> <p>Support schools develop 'new school' information / support package for</p>	<p>JM</p>	

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	carers to support induction Support schools develop 'new school' information / support package for families	families		
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Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes? X No?

Please state how this will be undertaken.

A steering group has been set up. This group will meet regularly if the proposal is agreed to monitor the progress and impact of the mitigating actions as laid out above.

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Appendix A

Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 