

<p>Cabinet</p> <p>29 January 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Debbie Jones, Corporate Director, Children's Services</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of the statutory consultation on the proposal to close Raine's Foundation School.</p>	

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
Forward Plan Notice Published	
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

Executive Summary

This report informs Cabinet of the outcome of the formal consultation following the statutory notice to close Raine's Foundation Church of England School. It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for Raine's to close on the 31st August 2020. The report includes a summary of representations received and any responses made; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

RECOMMENDATION:

Having considered all of the supporting documentation: particularly, the statutory notice set out at Appendix 1; the comments and objections raised by the eight respondents at Appendix 2; the Equalities Assessment (EA) at Appendix 3; and the report on the alternative options set out in Appendix 4, it is recommended that the Mayor in Cabinet approves the proposal, presented by the Local Authority and London Diocesan Board, to close Raine's Foundation School with effect from the 31st August 2020.

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the Council's response to the statutory notice on proposals to officially close Raine's Foundation School on the 31st August 2020.
- 1.2 The proposal to close the school has been put forward after the Local Authority

considered a number of alternative options. Given the financial pressures facing Raine's, the earlier Ofsted findings and the lack of pupils applying to the School this proposal is the option being recommended to the Mayor in Cabinet.

2. ALTERNATIVE OPTIONS

- 2.1 The Mayor could decide not to agree to the recommendation for the Raine's Foundation School closure. In which case the LA 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 no longer financially viable at its current size and will not 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 school closure, but this would mean that the School's financial position would 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 Foundation 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 statutory notice in respect of the proposal to cease to maintain Raine's Foundation School.
- 3.2 The Mayor in Cabinet is asked to consider the responses to the statutory notice, in taking a decision as to whether he wishes for the council to proceed with the Raine's Foundation School closure on the 31st August 2020.

4. INTRODUCTION

- 4.1 Following a report to cabinet on 30th October 2019, the Mayor agreed for the council to proceed with the issuing of a statutory notice on proposals to close Raine's Foundation School. The main facts on the background to this decision, and current position of Raine's Foundation School, are set out below, with the detailed information in the consultation paper and in the October cabinet report.

5. BACKGROUND

- 5.1 Raine's Foundation School is a five form entry Church of England secondary school, including sixth form provision, for up to 1050 pupils. The school comes under the auspices of the London Diocesan Board for Schools (LDBS). It is located in the Bethnal Green area with two sites. The main site is at the Approach Road, E2 and the other site at Old Bethnal Green Road, E2. The site at Old Bethnal Green Road is no longer in use as plans for it to house the

Raine's School sixth form did not come to fruition, due to insufficient pupil numbers.

- 5.2 Raine's has the capacity for up to 150 pupils at the point of entry in Year 7. For a number of years the school has experienced consistently low numbers of Year 7 applications and the total roll of the school has reduced over time. The School's current pupil roll is provided as follows:

Year	Males	Females	Total
Year 7	0	0	0
Year 8	18	20	38
Year 9	37	16	53
Year 10	1	1	2
Year 11	35	38	73
Year 12	0	0	0
Year 13	30	14	44
Totals	121	89	210

- 5.3 Schools receive funding per pupil and lower pupil numbers can create financial difficulties and present significant challenges with school organisation and the delivery of a high quality curriculum.
- 5.4 The table below presents historic numbers of Year 7 applications. It shows that since 2011 there has been a steady decline. At the closing date of the 31st October 2018, there were only 29 first preference applications received for admission to Year 7 in September 2019.

Raine's Foundation School – Year 7 Applications and Offers 2011 – 2020

	1st Pref	2nd Pref	3rd Pref	4th Pref	5th Pref	6th Pref	Total	PAN	Offers
2011	96	106	107	46	34	36	425	150	150
2012	71	94	90	56	22	37	370	150	114
2013	63	61	72	46	37	28	307	150	102
2014	65	85	74	57	33	36	350	150	95
2015	62	64	62	44	24	22	278	150	89
2016	57	55	57	28	36	23	256	150	88
2017	62	54	37	37	30	13	233	150	91
2018	49	65	40	26	25	11	216	150	72
2019	29	23	35	17	13	16	133	150	36
2020	1	6	12	6	10	8	43	150	TBC

- 5.6 In 2015 and again in 2017 Ofsted issued Raine's Foundation School with an overall effectiveness rating of 'Requires Improvement'. The 2015 Ofsted identified 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. This rating could be a reason for low applications to the school when other LA maintained secondary schools in the borough have been rated as 'Good' or 'Outstanding'. However, the number of applications to Raine's Foundation School was declining for a number of years prior to this. The LA was eventually able to remove the governing body and establish an Interim Executive Board (IEB). The main objective has been to restore standards of teaching and learning. Despite clear progress and commendation for the new leadership team's work by an Ofsted monitoring visit in November 2018, numbers of pupils remain low. The current attainment levels and general data on the School's performance are presented in Appendix 10.
- 5.7 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 areas the numbers of pupils moving from primary schools in Bethnal Green will remain, at the very best, static.

- 5.8 The current Year 7 pupil projections for the LA are attached as Appendix 8. This includes the planned secondary school capacity through to 2027, should the decision be made to close Raine's School.

6. REASON FOR THE PROPOSAL FOR RAINE'S FOUNDATION SCHOOL TO CLOSE

- 6.1 The proposal arises due to a fall in pupil numbers and the associated impact on the educational and financial viability of the school. The School is being recommended for closure due to underlying sustainability issues relating to its considerable and unrecoverable cumulative budget deficit at 1 April 2019 of £0.91m; its poor Ofsted rating; very low pupil numbers; and admission patterns that have seen a substantial decline in applications over the previous eight-year period:
- 6.2 A great deal of consideration has been given to the wellbeing of the school community, including pupils, families and staff, and the support they will require if the proposal is approved. The provision of a sustainable high quality education for all pupils has also been considered and will be provided for pupils and families if the proposal is approved. All possible impacts and risks are explored in the following section. Families have already started to look for new school places during the consultation period. Some have decided to take up offers at other schools in and around Tower Hamlets, including places at other faith schools. The majority have transferred to Oaklands. Please see Appendix 11 for the current list of Raine's pupil transfers.
- 6.3 The feedback from the schools where the Raine's children have already transferred has been very positive, particularly about their well-being and learning. The headteacher of Oaklands has met with parents of the Raine's pupils who moved to the School in November. They all also gave very positive feedback on how well their children have settled in.7. **THE KEY IMPACTS / RISKS AND HOW THEY WILL BE ADDRESSED**

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

Oaklands is the nearest non-denominational School and this proposal includes plans for it to accommodate displaced pupils from Raine's. If final decision is for Raine's to close steps will be taken to ensure that former Raine's pupils who wished to practice their religion could secure chapel time at Oaklands.

As there is another CofE secondary school as well as other faith schools in Tower Hamlets and surrounding areas, this will mitigate the impact of the proposed closure on the balance and access to faith school provision in the Tower Hamlets area.

Special Educational Needs (SEN) Provision - Five pupils at Raine's have an Education, Health and Care Plan (EHC). Forty three pupils are receiving SEN support within the school. Consideration of the needs of these children and how they can be accommodated in other schools is being supported by the Special Tower Hamlets Special Educational Needs and Disabilities (SEND) Team and the local independent SEND Information, Advice and Support Service. Every school has a responsibility to provide education to children with special educational needs irrespective of whether they have an EHC Plan or not. At Oaklands School there is a Special Educational Needs dedicated department that assists students with a range of educational requirements. This proposal is therefore expected to improve special SEN provision for these pupils.

Current Year 9 and 11 Pupils – Particular consideration has been given to the current year nine and year eleven pupils as they prepare for their GCSE, A Level or other post 16 course options next year.

Staffing Issues – there are a number of staff who have been at the Raine's for many years and they have remained throughout the period of this closure proposal to ensure the School's good running. A decision to close Raine's will force them to apply for new jobs. The Interim Executive Board (IEB), London Diocesan Board for Schools (LDBS) and the Local Authority are working together to support staff through this change and finding new positions. Details of meetings held with the staff and their unions as well as the support being provided are attached as Appendix 5. A formal staff consultation will only take place once the final decision has been made to close the school.

Equalities Considerations - An Equalities Assessment (EA) has been undertaken and is presented in supporting documentation (See Appendix 3). Although there are some groups who are considered more vulnerable the EA explains how the risks are being mitigated and demonstrates how the Governing Body, the London Diocesan Board and the Local Authority are working together to ensure everyone's needs will be met if Raine's does close.

8. CONSULTATION

- 8.1 The first stage of the consultation process was undertaken from 10th June 2019 to 31st July 2019. 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. An analysis on the outcome was included with the report to cabinet on the 30th October 2019 [here](#)¹.
- 8.2. 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 help to inform the cabinet decision to proceed to statutory notice.
- 8.3 All parents at Raine's and Oaklands Schools were individually notified of the publication of the statutory notice on the Council's website. The notice was also published in the Local East End Life Newspaper and in the public place(s) on each of Raine's and Oaklands School premises. It was also sent to the following persons or organisations:
 - Chair of the Raine's Interim Executive Body (IEB)
 - Chair of Oaklands Governing Body,
 - Members of the Joint Steering Group for Raine's and Oaklands School

¹ <http://democracy.towerhamlets.gov.uk/ieListDocuments.aspx?CId=720&MId=10193&Ver=4>

- LDBS,
- Raine’s Foundation Trust;
- Westminster RC Diocese.
- DFE Department for School Organisation

8.4 Parents were also invited to a meeting on the 11th November 2019 at the Professional Development Centre, 229 Bethnal Green Road, London E2 6AB, where information was shared about how representations could be made and the next stages in the process. There were also invited to ask questions and give their views to senior council leaders and a representative from the Diocese (LDBS).

8.5 The notes from the public meeting, recording the views and the points that were raised in the discussion, rather than verbatim minutes, are attached as Appendix 6. The lists of questions raised at the meeting were recorded and the answers were later provided by senior leaders and published on the council’s website.

9. **RESPONSES**

9.1 By the formal close of the statutory notice, the following responses were received and are included as Appendix 2:

9.2 The 8 respondents identified themselves as follows:

Parent carer of a child / ren at Raine’s Foundation School	2
Parent of Ex-Raine’s student(s)	1
Raine’s Foundation Trust Board Member	1
Raine’s Foundation Trust	1
Other	1
Did not to say	2

9.3 All eight respondents objected to the proposed closure of Raine’s School. The general themes from the responses are as follows:

- The pupil capacity of 1050 is challenged several times vs how many children there are on roll and why the numbers are so low (allegations of the LA and headteacher forcing children to other schools not of their choice, not allowing yr7, 10 or 12 pupils to admitted)
- Conflict of interest with between members of the IEB and Joint Steering group, as both employed by the same company, both want to close down Raine’s.
- Concern over possible conflict of interest as the HT at Oaklands is a member of the Raine’s IEB that agreed to close the school.
- Raine’s has more trees, better air quality and access to a local park
- Raine’s should become and academy and the 6th form provision extended. Better placed to offer more subjects than Oaklands whose 6th Form is oversubscribed. Suggestion that “Raine’s Sixth Form has been decimated by the successful efforts of Oaklands and LBTH to recruit Raine’s students by inferring that they would have to repeat their studies when the school closes”.
- Raine’s results show that it is improving, as did the report of Ofsted monitoring visit in Dec 2018

- Raine’s White British pupils are disadvantaged and closing the school is an attempt to dilute poor exam results and spread them out across the borough and beyond.
- Bishop Challoner and Canary Wharf secondary school are not appropriate substitutions for a Church of England School.
- Concerns of bullying at Oaklands – LA not taking safeguarding seriously. Forcing children to attend a school not of their choice does not promote social cohesion.
- Raine’s pupils will be in a “significant minority racial group” at Oaklands, which is far less diverse than Raine’s, so are likely to experience bullying
- Raine’s bursaries for further education and university were not included in the earlier Equalities Assessment
- The informal consultation showed that Oaklands and Raine’s parents did not want amalgamation with Oaklands.
- Oaklands does not have the capacity for Raine’s pupils and the LA have requested that Ofsted do not inspect as they are over capacity
- The LA has allowed standards at Raine’s to slip and money to be overspent
- The Raine’s Foundation Trust was never consulted on alternative options, such as amalgamating or federating with another school and there are no details published concerning these proposals.
- Absenteeism will increase for Raine’s pupils if they attend Oaklands, a school not of their choice
- Raine’s has a comprehensive SEND offer as per their policy which is not reflected in the EA
- The attainment of different demographics of children is not covered in the Equalities Assessment.
- The information in the Statutory notice is incorrect/misleading
- There is no signed copy of the loan to cover the Raine’s financial deficit, and the amount owed varies depending on what document is being referred to
- LBTH has not discussed the future of the state-of-the-art upper school with its owner (the Trust) but instead has non-specific plans to build two new schools elsewhere in the Borough.
- The IEB’s Feasibility study is flawed as it does not take into account the fact the Trust want to keep the lower school site
- LBTH and LDBS have colluded to update the building at Lower School without informing the Trust and without its approval. LDBS also improperly and unsuccessfully attempted to trick the Trust into sharing its 100% ownership of the Lower School Building.
- LBTH were not happy with the progress the headteacher made, and he was never approached about federation
- The LA is pushing Christians out of the borough. The Service Head, is openly and strongly against a Christian admission policy in the case of oversubscription. This...suggests strong discrimination against the Christian population. Outstanding Christian schools in the Borough now have a large Muslim student population because of the high quality of education. However, having removed oversubscription rules within

admission policies for Christian students, this means Christian students now cannot get into Christian schools.

- Children with Child Protection plans are not being supported

9.4 All of the points raised in these general themes have been addressed, either through:

- the previously published FAQs, available on the Council's website;
- the Council's response in the earlier, 30th October 2019, cabinet report;
- the Equalities Assessment, attached as Appendix 3, which has been updated to address the representation following the statutory notice;
- the Council's and LDBS response to the questions from the public meeting on the 11th November 2019, attached as Appendix 7.

10. TIMETABLE FOR IMPLEMENTATION

If the decision is made to agree the proposal for Raine's Foundation School to close, the timetable for implementation will be as follows:

- February 2020 - A staff consultation will be issued by the Raine's IEB
- Raine's pupils, who families choose to move to Oaklands School, will do so from the first day of the autumn term i.e. September 2020.
- The families of Raine's pupils who decide not to move to Oaklands will receive support from the LA School Admissions Team to secure places at schools with places elsewhere on or before September 2020.
- Raine's School will continue to operate up until the 31st August 2020 and then formally close.

11. EQUALITIES IMPLICATIONS

11.1 An Equalities Assessment has been conducted by the LA and is attached at Appendix 2. It has been updated in view of the responses to the statutory notice and the representations made at the public meeting on the 11th November 2019. This must be considered in detail when the Cabinet considers the matters above, as part of its decision on whether Raine's Foundation School should close.

11.2 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").

12. COMMENTS OF THE CHIEF FINANCIAL OFFICER

12.1 Appendix 9 gives an analysis of Raine's school's financial history and its continuing difficulty in setting a balanced budget. As the appendix 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 £0.152m in 2019-20 and increasing thereafter, with

no foreseeable prospect of repayment. As this is not a sustainable position the CFO supports the recommendation to close Raine's School.

- 12.2 In the event of the school closing at the end of August 2020, the governing body will receive a delegated budget share for the period April to August (5/12th of the financial year) with the residual 7/12^{ths} remaining within the centrally retained element of the Schools Block of the Dedicated Schools Grant (DSG).
- 12.3 Any pension strain arising from the closure of the school will be a charge against the school's budget, as required by the Scheme for Financing Schools. Redundancy costs are generally a charge to the General Fund, but provision for redundancy costs exists within the Central Schools Services Block of the DSG and decisions, in consultation with the Schools Forum, will be required on the use of the residual budget share.
- 11.2 If the recommendation is accepted the closing deficit 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 Planning for School Places report to Cabinet on 30th October 2019.

13. COMMENTS OF LEGAL SERVICES

- 13.1. 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 requires 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")
- 13.2. 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.
- 13.3. The report recommends that, having taken into consideration all of the responses received during the statutory representation period and the Equality Analysis, the Mayor in Cabinet approves the proposal, presented by the Local Authority and London Diocesan Board, to close Raine's Foundation School with effect from the 31st August 2020. Cabinet must take the responses conscientiously into account in taking a decision about whether to close the school.
- 13.4. Part 5 of the Guidance sets out the considerations that the Mayor in Cabinet must take into consideration when taking the decision as to whether Raine's should close. This must be taken within 2 months from the date of the end of the representation period to take a decision as to whether a school should close, otherwise the Schools Adjudicator will take this decision.

- 13.5. 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.
- 13.6. The Mayor must be satisfied that the statutory process has been properly followed. When issuing the decision, the Mayor can:
- reject the proposal;
 - approve the proposal without modification;
 - approve the proposal with such modifications as they think desirable, after consulting the LA and/or proposer (as appropriate); or
 - approve the proposal – with or without modification – subject to certain conditions (such as the granting of planning permission) being met.
- 13.7. Within one week of making a determination the Council must publish the decision in respect of the proposed closure and the reasons for that decision being made on the Council's website. The Council must arrange for notification of the decision and reasons to be sent to a number of named authorities and organisations.
- 13.8. The Council 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

- 13.9. 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 will be required, if the school closes. The school should follow its redundancy and redeployment process (or any adopted diocese or LA process if none is in place).

Equality considerations

- 13.10. 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).

13.11. 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.

14. ONE TOWER HAMLETS CONSIDERATIONS

14.1 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.

15. BEST VALUE (BV) IMPLICATIONS

15.1 This report confirms serious concerns about the future financial viability of Raine's Foundation School, given that the school budget is based upon pupil numbers, which have reached a critical stage of decline. At present there are no firm plans for the future of the school land and buildings and this cannot be properly considered until a final decision is made on the school's future. There is shared ownership on site at Old Bethnal Green Road, between the LDBS, Council and Raine's Foundation Trust, and any disposal of school sites will need to be considered by the Secretary of State.

16. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

16.1 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.

17. RISK IMPLICATIONS

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

17.2 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. Despite the LA writing to all parents to explain the option for their children to remain at Raine's until 31st August 2020, 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.

17.3 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.

18. CRIME AND DISORDER REDUCTION IMPLICATIONS

18.1 There are no specific implications arising.

19. SAFEGUARDING IMPLICATIONS

19.1 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

Appendix 1	Statutory Notice (issued on the 5 th November 2019)
Appendix 2	Copies of all eight responses to the statutory notice
Appendix 3	Equalities Assessment on the closure of Raine's School
Appendix 4	Report on alternative options to the closure of Raine's School
Appendix 5	Report on support to be provided to Raine's staff
Appendix 6	Notes from the public meetings on the statutory notice proposals
Appendix 7	LA response to the questions raised at the public meeting and the key themes from the responses to the statutory notice
Appendix 8	LBTH Year 7 Pupil Projections - including the planned capacity through to 2027, should the decision be made to close Raine's School.
Appendix 9	Summary analysis on the current financial position of Raine's School
Appendix 10	Current attainment levels and general data on Raine's Schools performance
Appendix 11	Current list of pupil transfers from Raine's Foundation School

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011
- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013

Officer contact details for documents: N/A