

Representations received via email

From: Johanna Kaschke
Sent: 04 November 2019 16:02
To: school organisation
Subject: Raine's Foundation consultation post 4.12.2019

I strongly support the continuation of Raine's Foundation school converted into an Academy for the following reasons:

Raine's Foundation had problems due to having half-capacity of pupils prior to the start of the consultation.

Capacity 1050 – actual pupils 526.

The problems, it seems to me, are due to complications because of governance decisions, which were detrimental to the school's development.

However, one has to take into consideration both the facilities and the location of the school, which in itself would make a winning combination for schooling potential.

Under the right leadership, the school can thrive very well indeed. Raine's has more trees than Oaklands in the surrounding area and direct access to a local park, also used by a nearby private school, Gatehouse.

The new Department of Education guidelines out since Sept 2019 and I copy the following lines to you: "An IEB may recommend to a local authority that a maintained school be closed. It may also recommend that the Secretary of State give a direction to a local authority regarding the closure of a maintained school. It cannot however, publish proposals for closure itself. Where, following the statutory consultation and other procedures, it is agreed that the school will be closed, the IEB should continue to hold office until the implementation date of the proposal. The IEB may also seek an academy order from the Secretary of State which enables the maintained school to convert to an academy."

It would be very sad to waste the excellent facilities because of some bad Governance decision taken in 2016.

Sir Alasdair Macdonald was commissioned to create a consultation document, with which he recommended in his feasibility study, dated 1. April 2019, that the school would best be closed and Oaklands expanded. Oaklands school incidentally has less capacity and is not located within such green and environmentally friendly location as Raine's school is.

With the appointment of the IEB and Alasdair McDonald being appointed onto it, the fate of Raine's school was sealed. The policy to close the school was rigorously followed. No other option was considered from then on.

Simultaneously a Steering Group was created with Alan Parker in the chair. Both Sir Alasdair Macdonald and Alan Parker are part of the same organisation, the Visions for Education group.

Both complement each other with this closure of Raine's school strategy.

Sir Alasdair MacDonald, *"He was headteacher of Morpeth school and during that period, attainment at the school rose significantly and Ofsted inspections in both 2007 and 2013 rated Morpeth as Outstanding. He "was achieving against the odds".*

So, this implies that Sir Alasdair Macdonald knows very well, from his own experience that schools can be turned around.

The only real issues for Raine's Foundation school are the low pupil numbers. A need for SEND provision expansion. New board of governors.

Yet, the Department of Education guidelines – as stated above – allow for Raine's Foundation school to be converted into an Academy upon application by the IEB. However because the IEB is composed of people who are pre-occupied with the closure of Raine's, due to Alasdair Macdonald's membership, the IEB will not look at other options.

The current Ofsted rating for

- Raine's secondary schools years 7 – 11 is 'in need of improvement'
- Raine's sixth form 'good'

Obviously there is a brilliant potential for Raine's school and I am certain that with the appointment of a new headteacher, or a headteacher who wants to take the Raine's school forward and a conversion into an Academy, good marketing, running the school mainly as a community school with affiliation to the Church of England, that would help the school to turn around and improve both attendance and viability.

There is absolutely no need to cause all this stress a closure of Raine's and expansion of Oaklands would cause. As the first round of consultation clearly showed neither parents of Raine's nor parents of Oaklands want this amalgamation to go ahead. There are currently immense complications about the use of the Lower school facilities by Oaklands.

Raine's Sixth Form could become a leading Academy with a large choice of subjects, currently Oaklands offers only 16 subjects (12 A-level, 3 BTEC, 1 ASDAN) without offering any sport, whilst Raine's has well established affiliations with Sport England. A competitive Sixth Form must offer in excess of 20 subjects including sport. Raine's who already own the facility of the Lower School, are better suited to deliver this.

It would be much better and less complicated to extend Raine's provision, using the excellent lower site (Old Bethnal Green Road) and Upper site facilities (Approach Road) and allow everybody to educate their children in peace and with contention.

Because of a wrong decision by the Council to follow a closure of Raine's policy, which further reduced pupil numbers by half again, the council should absorb – write off – any existing debt and allow the school to start afresh.

From: G McCormack

Sent: 05 November 2019 11:16
To: school organisation
Subject: Raines Foundation

I oppose the disgraceful decision to close 300 year old Raine's Foundation School.
My two children have been forced elsewhere.
My daughter bullied into leaving her now year 10 class and my son refused his year 7 place with scholarship.

The forced move to Bow school has proved detrimental to their wellbeing. In year transfer is a challenge for a Raine's cast offs.

The location is diabolical for pollution yet Raines has the best location with the lowest pollution levels.

My son has Asthma and Exzema and is having a flare up. Now missing vital days off school due to illness. A direct result of the LA, John Biggs and Inigo Woolfe.
The stress as a family is still overwhelming.

Shame on those who are responsible. I thought children mattered. Where's the LA'S safeguarding policy for all the children.

From: Rebecca Gilbert
Sent: 05 November 2019 11:48
To: school organisation
Subject: Closure of Raine's Foundation School

Dear Sirs,

I am writing in connection to the closure of Raine's Foundation School. I would like to object for the following reason:

My daughter who is now in year 8, attends the school. I feel that it is very unfair to expect children of this age, who are going through lots of growth in all areas of their lives, including socially and mentally to have to deal with this enormous upheaval.

These children have made their groups of friends and despite an initial transition period, my daughter has settled in nicely at the school.

Raine's has a diverse mix of cultures and religions. It is recognised that Oakland's is not so diverse and I am worried if she is to be transferred there, she will not be accepted and may experience bullying (never experienced at Raine's, despite the 'reputation'), which would disrupt her schooling.

I opt for Raine's to remain open.

I hope my contribution helps to sway the decision.

Best wishes,

From: Derek Smith
Sent: 05 November 2019 12:39
To: school organisation
Subject: PROPOSED CLOSURE OF RAINES FOUNDATION SCHOOL

I would like to comment as follows on the planned closure of Raines Foundation School. In the past the school was a beacon of excellence in the Tower Hamlets area. Pupils travelled from all over London, not just the East End, to attend Raines when it was a Grammar School. The move of the school from its building in Arbour Square to an older and smaller building in Bethnal Green was clearly a mistake. How have standards been allowed to slip in such a marked manner and why is the school so far over budget?

Responsibility for the decline of this once excellent school must be laid at the door of local authorities. If the right support had been provided to the staff it would, I am quite sure, still have its good reputation and be sending a significant number of students to university, a smattering to Oxford or Cambridge as it did in the past.

The decline in numbers of students is, almost certainly, partially due to the rumours about its closure. Your local authority, and the Mayor of London should be ashamed of the way in which you have allowed this school to decline.

As you can afford to close a 1050 place secondary school I imagine that the population of Tower Hamlets is declining in line with the number of student places required?

From: Johanna Kaschke
Sent: Monday, November 4, 2019 4:50:46 PM
To: school.organisation@towerhamlets.gov.uk <school.organisation@towerhamlets.gov.uk>
Subject: FW: Raine's Foundation consultation post 4.11.2019

Just correcting the subject line, rest of e-mail stands as sent previously.
Kind Regards

From: Johanna Kaschke
Sent: 05 November 2019 17:26
To: school organisation
Subject: 3. Submission : Raine's Foundation consultation post 4.11.2019

Further to the two emails below, I feel it is necessary to add that I think the council should have sought a second opinion and not installed Mr MacDonald as Governor on the IEB to carry out the action, he felt was the correct one without any other input.

Mr Macdonald was severely unilateral to his post, there was only one side allowed, no argument could evolve as to how the pupils are best served.

A neutral governor should have been appointed, who could have had other views. Another opinion could have brought up other views as how to solve the problem.

Both Mr Parker as Chair of the Steering Group and Mr MacDonald as chair of the Visions for Education Group work closely together and their simultaneous appointment is merely thought to conduct the closure of Raine's.

There is an obvious conflict of interest. I do not know whether there is also a pecuniary interest as both gentlemen belong to the same organisation.

From: S Adams
Sent: 12 November 2019 08:50
To: school organisation
Subject: RAINES FOUNDATION SCHOOL

Re Raines foundation School

Statutory Proposal to close the school

: whys is Canary Wharf mention in the notice as a Cof E school – this is incorrect

: The school role is 217- this is because TH have and the head of the school was ringing parents and telling them to move school in years 9 and 11 , on GCSE results day the students were refused the option to join Raines 6th Form and told to go to either Oaklands or another school – this in breach of what was on the schools web page – the council then stated there was not enough students to keep the year 12 open – even though these students were not allowed to sign up – how does TH know how many wanted to carry on their education at Raines

: why was year 10 students forced out of the school ??? those that did return had no classroom – no teachers and no timetable ??

: if only 7 pupils transferred to Oakland's as stated in the Proposal why do they need to expand

: why is the year 12 at Oaklands so overly subscribed that they have no common room to use and are sitting in halls to do work when they have no lessons ?? TH is failing both schools pupils in this respect

: Why has emails and letters not been answered by council ??? Even the mayor has taken no notice of email –

: how does TH expect to safe guard pupils from Raines in other schools after what we heard at the meeting last night ??

From: Maria Mole
Sent: 27 November 2019 17:08
To: school organisation
Subject: FAO SOPPM re Raine's Foundation

Dear School Organisation and Place Planning Manager,
I would like to notify you of my formal objection to the Statutory Notice regarding the closure of Raine's Foundation School Approach Road Bethnal Green.

My objections are based upon the misleading and inaccurate information contained in your supporting documents and Equality Analysis which have informed your decisions. I would appreciate confirmation upon receipt.

Please find attached two separate documents
1 Statutory Notice Objection
2 Objection to Statutory Notice

From Maria Mole. Objection to Statutory Notice to Close Raine's Foundation School and Objection to the Equality Analysis Based on Inaccurate Supporting Evidence Current; Decision Rating Amber

Please note my strong objection to the supporting evidence used in the Equality Analysis which has been used to enable the Statutory Notice .

SECTION 1

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

The 2019 GCSE results are much improved and the best improved in the borough. The Dec 2018 Interim OFSTED Monitoring report was good and highlighted the dramatic improvements since summer 2018.

These concerns were focused on its financial viability, set against a backdrop of declining pupil numbers together with the capacity of the School to improve pupil behaviour, progress and outcomes rapidly. Numbers of pupils enrolled at Raine's has been steadily declining, from 808 at the January census in 2012, 747 in January 2014, 669 in January 2016 and 520 pupils in January 2019. The current pupil numbers are well below the School's target of 800 and less than half its planned capacity for 1050 pupils.

The school capacity at Approach Road is actually 750. The Lower School (currently unoccupied) has a capacity of approx 200. The schools GCSE results September were the best improved in the borough. In December 2018 OFSTED said Since September 2018, however, the quality of education the pupils are receiving has improved quickly and dramatically and Behaviour is now managed very carefully and skilfully from the very start of the school day. In the lessons we visited, pupils behaved consistently well. This would indicate that the school does indeed have the capacity to progress quickly.

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.

There are no details published concerning these proposals and the Raine's Foundation Trust have never been consulted on any such proposals. The only other Church of England School in Tower Hamlets is Sir John Cass and they have no knowledge of any offers to amalgamate or federate.

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.*

Oaklands may well be popular with local families, but obviously not with Raine's parents who did not choose Oaklands but did choose Raine's with its good Sixth Form which has consistently shown that children make more progress there during A level study than at Oaklands (gov.uk compare data). It was Paul Wood from Sir John Cass who was in fact the initial Executive Head. He was the person responsible for rapid change and was due to stay at the school for longer than his eventual 6 month secondment. Oaklands became involved after Ms Canavan was invited to attend an IEB meeting in December 2018, joined the IEB in January 2019 and voted to close Raine's in order for her own school to expand. Of course Oaklands needs to expand in order to survive financially. I would question why such a clear conflict of interest is not highlighted on your assessment. I would also point out that if expanding her school results in a higher banding and therefore a higher salary, there would be a pecuniary interest.

SECTION 3

In the national GCSE benchmark of the percentage of pupils achieving grade 5/C or above in English and maths, Raine's average student score was significantly below the Tower Hamlets and national averages in: 2015/16 (Raine's average was 35% vs TH average of 63%); 2016/17 (Raine's 30% vs TH 44%); and in 2017/18 (Raine's 22% vs TH 44.8%).

11-16

This takes no account of the different demographics of schools locally and nationally. Nationally the percentages of Bangladeshi (main demographic of Oaklands) and White British (main demographic of Raine's) as published by gov.uk. (All that Group, Free School Meals, Non Free School Meals)

2017.	White British.	Bangladeshi
All.	42.7	49.1
FSM.	16.7	38.9

NonFSM.

52.4.

46.0

You can see the huge gap between groups that disadvantaged White British children have nationally. Tower Hamlets has the 5th lowest score for this group in the country. Of course this is not acceptable either locally nor nationally but closing a school is not going to solve this problem. It is a debate which has been going on for some years now. Of course your aim would be for all children to be achieve well and of course the local schools that are achieving this are to be congratulated but do not blame one school for a national problem, and especially not one with such a high level of disadvantage, child protection and behaviour challenges.

Raine's Progress 8 score is classed as "well below average" at -0.84, putting it in the bottom 13% of schools nationwide. Oaklands' Progress 8 score is 0.68, in the top 14% of schools in England and classed as "well above average".

Summer 2019 Progress 8 Scores show a vast improvement at -0.38. These results indicate that the school has in fact made the fastest progress in the borough.

Disadvantaged White British children are not only the lowest attainers nationally, research has found that as they get older the situation becomes more acute and the gap widens. By contrast Oaklands largest ethnic group are amongst the highest attainers nationally. By trying to move Raine's children you will succeed in 'hiding' them rather than proactively supporting Raine's to buck these national trends. To quote Professor Strand of Oxford University : "Equity gaps are NOT the result of a small number of failing schools, which if they can somehow be fixed, will remove the overall Socio Economic Status or ethnic achievement gaps. I would also urge caution in making direct comparisons of Progress 8 Attainment between the two schools as your own party at National Level has asked for these tables to be amended in light of the impact they have on schools serving white working class children. They, along with a growing number of experts have identified that the formula used is skewed and as Dr Terry Wrigley has said it is "an unreliable identifier of school ineffectiveness". I would also point to the disconnect between the perception of the Lower School to the Upper School. How on earth could the sixth form manage to be consistently 'Good' if there wasn't effective teaching in lower year groups. LBTH have managed to make this a difficult task by effectively replacing permanent staff with a high proportion of supply staff so as to prejudice standards.

In addition, the declining numbers of students in Raine's sixth form means the range of subjects offered is restricted. The Department for Education's recommended minimum size for a viable sixth form is 200 pupils. The number of students in Raine's Sixth Form for the academic year 2019/20 is approximately 132 pupils, whereas there are 212 pupils in Oaklands' Sixth Form.

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.

Oaklands Sixth Form did not have 200 pupils prior to this year. Raine's has historically had a popular and successful Sixth Form . Governing Body minutes refer to an oversubscribed Sixth Form and in 2017 was in the top 30% of providers nationally.

86% of pupils at Raine's stay in education or employment for at least two terms after Key Stage 4, compared to the LBTH average of 93% and an English average of 94%. For Oaklands' pupils, it is 94%, above even the LBTH average. The percentage of Raine's pupils staying in education for at least two terms after KS4 according to gov.uk is actually 89%. I would point out that this is data for

one year only and it would be more useful to see data collected over time. The table below , for instance, shows the percentage of Raine’s pupils staying in education or employment for at least

17:41 Sun 24 Nov compare-school-performance.service.gov.uk 69%

Student destinations (education and employment after 16 to 18)

Students staying in education or employment for at least 2 terms after 16 to 18 (level 3) study

Students finishing 16 to 18 study who either stayed in education or went into employment from October to March the following year, or stayed in an apprenticeship for at least 6 months. The data published in January 2019 is for students who finished level 3 (A levels or other level 3 qualifications) 16 to 18 study in 2016, which is the most recent data currently available. For further details, see the [16 to 18 Accountability Technical Guide](#).

[View as chart](#)

	2016	2017	2018
School / college	97%	97%	91%
Local authority state-funded schools / colleges	87%	90%	89%
England state-funded schools / colleges	88%	89%	89%

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About this data

- [Abbreviations](#)
- [Further guidance](#)

two terms after 16-18 study

As you can see Raine’s pupils have a higher average than either local or national statistics and are more than comparable to Oaklands whose percentages were:

2016-92% 2017-85% 2018-93%

Pupils at Raine’s are also far more likely to be persistently absent from school. As of 2017/19, 17.9% of pupils were persistently absent, as opposed to 7.8% at Oaklands, and an English average of 13.9%.

There has been a Targeted Intervention Group (LA led) involved with the school 2016-2018, a Governing Body heavily influenced by and working closely with the LA 2016-2018, and an IEB with members approved by the Secretary of State including the Executive Head of Oaklands. The Deputy Head of Oaklands is the Acting Head of Raine’s. Despite this, persistent absenteeism is a challenge that has not been solved. I would suggest this would not be proof that changing schools will solve the absenteeism, merely dilute the figures if the pupils are enrolled at different schools. If the leadership of Oaklands have not been able to solve this problem since taking over the school, then how would trying to get the pupils to attend Oakland improve the situation? I would suggest that for these children the problem may become worse and they may attend even less. This is a safeguarding issue as these children may be out of school and on the streets.

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.

As per above this paragraph does not stand up to scrutiny and should be considered more carefully. There is no evidence that all children will transfer to Oaklands. There is evidence that Raine's has improved rapidly at KS4. The Raine's Sixth Form is rated Good, make more progress than Oaklands and pupils stay in education or work at a higher than national average. Vulnerable absentees have not been so well supported by the current Oaklands leadership that they are attending at a satisfactory level.

Although children with SEND may be "disadvantaged" by potentially attending a school with more children on roll and/or by the process of moving between schools, there is currently no educational provision which is reserved for pupils with SEND at Raine's.

Here is the Raine's Local Offer and SEND Policy taken from Raine's website. If the leadership of Oaklands are supplying no SEN provision at Raine's since taking over I would suggest that this is also a safeguarding issue and would suggest that OFSTED should be called in.

Raines Foundation School Local Offer

How we support children with special educational needs or disabilities

Our vision and how we hope to achieve it

Our school community provides an aspirational learning environment for all students whatever their abilities. We are committed to enabling all our students to achieve their full academic potential and to develop into active and confident members of society. We are an inclusive mainstream school where equality for all aimed for at all times. We have a culture of inclusion and with our aim being for all students to be able to participate in all aspects of school life.

Type of school

We are a Church of England school that accepts students from all faiths and beliefs. We admit students 11-19 including our sixth form.

How we give pupils a voice

At Raine's Foundation school we love to hear from our students and enable students to do this in many ways. We offer a person centred planning approach for any annual review, PEP or TAC meetings making the young person's view central to any provision or decisions being made about them. One part of sharing information about a student with staff members is using the One Page Profile model. This is created with the students ensuring their views and opinions are presented about how to best support them in lessons. We also have mentors and pastoral staff within the school who will listen to pupils and facilitate dialogue about any issues they may have in school.

How do we know if student has special educational needs ?

Students with special educational needs or disabilities are usually identified at primary school prior to transition. At Raine's we want to support these students through any transition periods. This transition programme includes liaising with Primary school teachers, a transition day and individual visits where necessary. We will ask all students to complete a baseline reading testing at the start of yr. 7 and use this information in conjunction with a KS2 data analysis to identify any additional needs. We will also take referrals from members of staff, parents and the students themselves.

What we do to help children/young people with SEND

Quality First Teaching is delivered in all lessons. Staff members are made aware of students with SEND on the first day of the academic year which are adjusted and adapted throughout the school year depending on the need of the child. We currently provide literacy intervention at KS3 which provides additional wave 1 and wave 2 support. As part of the inclusion department we will carry out our own internal assessments and make referrals to external agencies for assessment and action planning and reviewing in liaison with pupils and parents. In addition to this all students with EHCP or who have received specialist interventions have a One Page Profile which is shared with all staff members and external agencies.

Other forms of support we provide are;

- In class TA support
- Greenhouse sports mentoring
- 1:1 mentoring support emotional language development

- Break and lunchtime games club

- Low sensory room providing calming environment (Retreat)

As a school we believe all teachers have a responsibility for teaching students with SEND and are supported by a team of specialists in the Inclusion Department. This consists of

1X SENCo

1X Senior Support Officer

3 x support officers

As part of our Inclusion Unit we also have the following staff

1 x RIC Manager

1 x support officer

2 x Pastoral Support Officers (PSO)

How we adapt our teaching for children and young people with SEND

As a Quality First Teaching school we focus on differentiation to ensure all students can meet the curriculum. The inclusion department offers on going support & training to mainstream staff on meeting individual needs and developing effective wave 1 interventions.

How we decide what resources we can give to child / young person with SEND

At Raine's we will provide provision to ensure we are meeting the needs of all students with an EHCP in line with the long term outcomes. Students with SEN but who do not have an EHCP benefit from provision which is allocated and determined on the basis of need. This will be reviewed and adapted based on level of progress being made and with input from Head of Learning.

How do we check that a child or young person is making progress and how we keep parents informed?

All students have their progress reviewed termly through a school report which is posted home. In addition to this monitoring the progress made by students with an EHCP is via the annual review process. This will allow for the student, parents and staff members to discuss, monitor and review any provision in place.

Support we offer for children and young people's health and general well being

The School will aim to put in place all reasonable adjustments necessary to support individual students within school. Information is carefully and sensitively shared with school staff in consultation with health professionals and parents

Other provision we provide to support the pupils at our school are the Retreat and the Raines Inclusion Centre (RIC). The Retreat is a place where students can go to for support when they are feeling vulnerable and when they feel they need timeout throughout the day. This is usually

staffed by our mentor figure. Provision provided at the RIC is to support any students with behavioural difficulties. This might include 1:1 support or small group sessions with support workers who are experienced in working with students with behavioural needs. There is considerable expertise working with students at risk of exclusion in both the Learning Support Unit and the Retreat.

Specialist External Services we use when we think extra help is needed

- Educational Psychologist
- CAMHS (Child and Adolescent Mental Health Services)
- The Parents Advice Centre (PAC)
- Social Services
- School police liaison officer
- The Careers Service
- The Behaviour Support team for advice

Our school environment

Following an extensive re-building programme the school is mostly wheelchair accessible and all classrooms have interactive whiteboards. Pupils can access the main school facilities at break and lunch times ensuring they have opportunities to be included in the life of the whole school.

How we prepare for children and young people joining our school and leaving our school

Pupils with SEND are identified by primary school staff prior to transition. A detailed transition programme including meetings with primary, additional visits in summer term increase our knowledge of individual needs. In addition to these meetings a detailed analysis of KS2 data allows for early intervention. The school secures equipment and facilities to support children and young people with special educational needs on loan and via its delegated budget.

How parents are involved in school life

Parents of children with SEN are consulted regarding their views on their child's provision, support and experiences at school.

We will communication with home via;

- Parents evening
- Information events at the school
- Phone calls and Letters home
- Newsletters
- Praise postcards
- Parental Bulletin

Raine's Foundation School SEND Policy 2018/2019

Vision

At Raines Foundation school we believe all students are entitled to a broad, balanced curriculum that reflects their needs and aspirations. Like all students, those identified as having SEND are individuals with a variety of learning styles, strengths and difficulties.

Our school promotes inclusion and recognises every teacher is a teacher of every student, including young people with special educational needs and disabilities (SEND). Our ethos is one of inclusiveness and providing opportunities to all our students.

Aim

Our aim is to raise the aspirations and expectations for all students, including students with SEND, so they can achieve excellence by unlocking their potential. We hope all students leave school with the best qualifications and skills possible, to enable them to live successful and independent lives. We take a holistic approach focusing on outcomes for our young people and supporting them on their educational journey.

We aim to support a wide range of students' needs in a cross-curricular environment. The SEND department take a lead and co-ordinating role as well as directly supporting students with SEND. Details of our school offer is available on the website.

Objectives

- To identify and provide for students with SEND and additional needs.
- To work within the guidance provided in the SEND Code of Practice, 2015.
- To take a 'whole person' view of individuals with SEND, and to take a 'whole school' approach to supporting them.
- To provide support and advice for all staff working with SEND students
- To use a graduated approach to support students
- To assess, monitor and evaluate the performance of SEND students involved in core intervention strategies.
- To work closely with students and their families/ carers to ensure that the voices are heard.

Responsibility for the Provision of students with SEND

Students

Students are encouraged to take an active part in identifying suitable targets and monitoring their own progress. At Raine's Foundation school we use a Person Centred approach when developing a support plan for SEND students. Students are encouraged to develop their independence as they get older. One Page Profiles are copied to all staff to facilitate student engagement and appropriate differentiation.

Subject teachers

All teachers are responsible for the education of students with SEND and ensuring that SEND Support Officers are supporting those students identified as having SEN. To help promote inclusiveness, all new teachers have an induction session with the SENDCo, so they are aware of the neediest students and how to support them (HOW CAN WE MAKE SURE THIS HAPPENS?) This involves planning differentiated strategies and providing useful feedback to help these students make progress. Subject teachers are responsible for making appropriate provision and knowing

the outcomes and specific strategies for students with One Page Profiles. Teachers are asked to contribute to reviews of progress and formulation of One Page Profiles.

SEND Support Officers

SEND Support Officers work with those students identified as having SEND, either in class or in small group interventions. They assist learners to develop their literacy and numeracy skills and to make progress within different subject areas. Their role is not to tell students what to write or do, but to guide them through effective questioning and by developing the students self – esteem. SEND Support Officers are encouraged to offer assistance to all students, not just students identified with SEND. They are an integral part of the learning community.

Senior Support Officer

The SEND Senior Support Officer (SSO) is responsible for organising and line managing SEND Support Officers. The SSO ensures that students have their statutory hours of SO support, as well as assigning support to those students without an EHCP. They also hold regular meetings and training sessions with the Support Officers. They are responsible for ensuring that examination access arrangements are in place and that students get the support they are entitled to. The SSO also oversees interventions for students identified SEND and ensures student records are up to date and reviewed where necessary.

SENDCo

Provision for students with SEND is co-ordinated by the SENDCo, who is responsible for the day to day operation of the SEND policy and implementing the targets on the Departmental Development Plan. S/he works in close collaboration with: the students, their parents/carers, school staff and outside agencies and provides relevant professional guidance on curriculum and pastoral matters to colleagues to facilitate Quality First Teaching for students with identified SEND. The SENDCo monitors the overall progress of students with SEND and works closely with SLT to monitor the effectiveness of school provision.

Other responsibilities for the SENDCo include;

- Working with SEND STL Line Manager to embed teaching for SEND across the curriculum
- Monitor and track progress of students on SEND register.
- Overseeing students records, monitoring and reviewing of progress and provision
- Maintaining and updating the SEND register, including identifying the 'Area of Need' and 'Sub-Categories' in accordance with the SEND Code of Practice (2015)
- Contributing to in-service training of staff
- Holding regular meetings with SSO and SOs

- Working closely with SSO to identify appropriate resources to support classes and individuals
- Liaison with parents / carers of students with SEND
- Work closely with SSO and SO to arrange and run Annual Reviews and Learning Support meetings
- Liaison with external support services
- Carrying out Performance Management planning and reviews
- Attending the Inclusion Panel

SEND Line Manager

The SEND Line Manager currently has overall responsibility for the implementation of SEND and Inclusion within the school. He will ensure that the SEND policy is implemented and s/he will monitor and review its effectiveness.

Governing Body

School governing bodies have statutory duties towards students with SEND. Governors must report annually to parents on the policy for students with the SEND and provide details of provision and allocation of resources. The Children and Families Act 2014 requires the governing body to admit a student to Raines Foundation School, where they are named in the Educational, Health and Care Plan. Governing bodies must use their 'best endeavours' to ensure that special educational provision is made for a student.

Admission Arrangements

A child with an EHCP naming Raine's Foundation School will be offered a place, unless there are particular reasons why the school is unable to do so. The place will be provided in the appropriate band of ability. Requests may be refused where other schools in the LA might be better able to meet the students' needs which is a better use of LA top funding e.g. where there is a hearing impairment department. (NOT SURE THIS SENTENCE IS APPROPRIATE)

Resourcing at Support for SEND

For students in this category, the Learning Support department provide a range of additional support of various kinds. This includes small group classes for literacy and numeracy, speech and language and learning mentor support. In-class support is provided by Support Officers for some core lessons.

Resourcing for students with EHCP's

Students with EHCP's have person-centred annual reviews at which progress is evaluated and decisions made about the appropriateness of the current provision on the plan. Relevant external agencies are invited to these reviews. Students receive the provision specified on their EHCP.

Identifying Special Educational Needs

At Raine's we aim to match the special educational provision to the student's identified SEN, so when identifying Special Needs, we align students within the four main categories of need, as outlined in the Code of Practice (2015):

- communication and interaction (CI)
- cognition and learning (CL)
- Social, emotional and mental health (SEMH)
- Sensory and/or physical needs (SP)

We shall inform parents when we are considering making special provision for a student. Where necessary we shall work in partnership with parents to establish and secure best outcomes, taking full account of their views and wishes.

Aims of SEND Identification and assessment:

- To identify students needing support to access the curriculum
- To identify needs and plan teaching strategies
- To provide feedback for students to enhance learning skills
- To develop student's ability to identify own achievements and target areas

for improvement

- To provide feedback to teachers on effectiveness of teaching strategies
- To encourage the use of a variety of assessment techniques to ensure

each student has the opportunity to succeed and becomes aware of progress made

Should a parent or carer have concerns that their child may have Special Educational Needs they should contact the school's SENDCO.

Managing Students' Needs on the SEND Register

We take a graduated approach with four stages of action: assess, plan, do and review as set out in the SEND Code of Practice.

Assess

Identification of SEND is based on:

- Primary school or teacher assessment
- Reports and referrals by subject teachers
- Information from parent and students

- LUCID Exact Computerised Literacy Assessment and Accelerated Reader

tests and assessments by specialist eg, Educational Psychologist

Plan

The first step is inclusive, quality first teaching, where students are provided with opportunities to access the curriculum, and work suitably differentiated. It is the responsibility of the SENDCo and the Learning Support Department to communicate with teachers and provide them with the relevant information, practical strategies, and where necessary training.

Students in the SEND register will receive targeted provision which could involve one or more of the following interventions;

- Additional adult support in the classroom
- Small group addressing particular need
- 1:1 intensive support work

Do

The SEND Code of Practice (2015) places teachers at the centre of day to day responsibility for working with students with SEND. High quality teaching is the first strategy used in supporting students with SEND. Wherever necessary, the curriculum is differentiated for individuals, to enable them to access the curriculum.

Support Officers are deployed as additional adults in the classroom to support the teacher with the learning of students and SEND. The SENCO, SEN SSO and some SEN Support Officers are also deployed to deliver 1:1 sessions or small groups interventions when necessary.

Review

The Learning Support Department will hold termly Learning Support Review Meetings to plan, monitor and review the impact of any intervention. In cases where there is a high level of need parents will be invited into school to be a part of these meetings. For students with an Educational Health Care Plan (EHCP), one of these meetings will be their Annual Review.

In preparation for the annual review the opinions of students, parents, school staff and other professional working with the student will be sought. Tracking data will also be used to ascertain the student's progress in their subject areas.

Statutory assessment of SEND

If, after review and consultation with parents, agencies and teachers the School or LEA considers the needs for a full assessment is necessary, a statutory assessment is completed. If agreed, the LEA will consult with the school, agencies and parents to write an EHCP. Not all statutory assessments result in an EHCP.

Educational, Health and Care Plans

If the LEA decides to issue an EHCP, it details the nature of the provision and that the EHCP must be reviewed within a year.

Inclusion

Students with SEND join in the usual academic and social activities of the school together with students who do not have SEND. The SENDCO, SSO and Support Officers support teachers in being clear about what different groups of pupils need within the school. With the emphasis on more inclusive education all members of the school community are made more aware of individual students' needs. Inclusion and the Code of Practice both increase the responsibility of all staff for students with SEND.

Criteria for Evaluating the Success of the SEND Policy

The following criteria will be used to evaluate how successfully the policy has been implemented:

- Agreed procedures for referral being followed
- SEND list kept up to date and available to all staff
- All staff have access to a copy of the One Page Profiles for the students

they teach and support

- All staff are aware of the contents of the One Page Profile and aware that they are invited to provide comments of suggestions for the next Learning Support Review meeting.

- Students on SEND register have a copy of their own One Page Profile and know what their Outcomes are.

- Students on the SEND register make progress as shown by the monitoring of outcomes, by results of standardised tests, teacher assessment of progress and public examination outcomes.

Parent Voice

Parents who wish to voice a concern about their child's progress or complain about SEND provision can make an appointment to see the SENDCO. The SENDCO will keep a log of any concerns and action taken in response. The SLT line manager will also be informed of any concerns raised.

External Support Services

The school consults and uses the following as appropriate:

- Educational Psychology Service
- Educational Social Work Service
- Tower Hamlets Careers Service

- Support for Learning Service
- Speech and Language / Visual Impairment / Hear Impairment services
- Child and Adolescent Mental Health Service (CAMHS)
- Parents' Advice Centre
- Local Education Authority (LEA) SEND Section

I felt it best to copy both documents to draw your attention to the support that is given which would be the duty of the IEB and Oaklands management to provide as they run the school.

For those pupils who would wish to continue at a faith school, Sir John Cass Foundation is the other CofE school in the area, although there is also Christian provision at Bishop Challoner and Canary Wharf secondary schools. Accessing places at these schools within the borough may result in an increased journey for some pupils:

Bishop Challoner is a Roman Catholic School and therefore not a suitable substitute for parents seeking a Church of England School. Canary Wharf has a Christian Ethos, again not necessarily an appropriate substitution. LBTH is directing parents to choose the only other suitable alternative which is in Hackney. Maybe the LA is hoping that some of the unfavourable statistics are no longer going to be their concern? Tower Hamlets has the 5th worst results nationally for White British Children. If Raine's children found themselves being schooled in Hackney maybe Tower Hamlets would be relieved?

antipathy" of Oaklands pupils towards Raine's pupils which "may in part be based on faith". However, there was no evidence in that claim that in relation to Oaklands that there is any 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 Raine's and Oaklands.

Whatever motivation students from Oaklands had, the abuse and harassment suffered by Raine's students and parents was serious enough to result in Patrice Canavan writing letters of apology. If the LA had any serious intention re safeguarding Raine's pupils they would interview every student and pupil who has had to leave the school and ask about their personal experiences. To then dismiss any threat to children who will not transfer to Oaklands is shocking and an attitude that is totally inadequate.

The Council and leadership at Raine's and Oaklands are cognizant of the different demographics of the two

And yet no reference has been made to this in relation to academic outcomes which is very relevant to this assessment.

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.

If every Raine’s pupil moved to Oaklands there would still be a significant minority racial group. The LA is ignoring both this and the prospect of Raine’s students actually not choosing Oaklands as their preferred option. The word SAFEGUARDING should be firmly embedded in this process and this does not indicate that the LA is taking the issue with any real seriousness.

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.

Whilst this aim may be considered noble and I am sure that we all want good relations between communities, I am puzzled as to how forcing children to attend a school not of their choice will achieve this.

As with the impact on other protected characteristics, Oaklands is a higher performing school than Raine’s, therefore enabling a greater percentage of white British pupils to attend there than before is likely to advance equality of opportunity between racial groups, by raising educational attainment opportunity for white British children, and others.

Please see comments above re academic achievement and ethnicity, the rapid improvement of Raine’s and the Good OFSTED Rated Sixth Form.

Raine’s Foundation Trust currently offers scholarships in maths and sports, of which 6 students are in receipt of. The Trust would have to decide whether to continue to offer said scholarships.

The Trust actually offers Bursaries to students entering Further Education and University subject to meeting qualifying criteria. These Bursaries can be worth approx £2000.00. This is specifically aimed to support our young people to grasp opportunities and fulfil their potential.

The air quality at Raine’s and its surroundings is better than other secondary school locations around the borough. However, this has not detracted parents from relocating to other areas in Tower Hamlets, nor prevented them from applying to different secondary schools, thereby suggesting that, when balanced against educational standards, air quality is not a top priority for parents. It is also is not enough of a factor for the LA to reasonably consider as a basis for keeping a school in financial deficit, with a falling roll, open.

Although of course the LA has declared a climate emergency and Raine’s parents did look on clean air as a positive.

Second Part of Objection from Maria Mole

As I have no doubt that there will be no other decision than to close Raine’s Foundation School from August 2020 I have questioned whether to enter into any correspondence regarding the Statutory Notice. I do feel, however, that LBTH should consider whether a truly honest and transparent authority would allow documents that do not tell the whole story to be published.

I draw your attention to the following, all from your supporting documents.

CABINET DECISION

Prior to determination of the initial proposals a number of alternatives were explored to support a sustainable future for Raine's School. These were discussed in detail with the London Diocesan Board and Interim Executive Board for Raine's School in meetings on 16th and 30th November 2018. Unfortunately none were found to be viable. These alternatives together with explanations of why they could not be pursued are set out in appendix 5

It is my understanding that LDBS have no knowledge of these meetings. If the future of the school were being discussed why was the Raine's Trust not invited to attend as they are a major stakeholder and freeholder of buildings. I would also question why the Trust have no access to these minutes.

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

FYI the capacity of Approach Rd is 750. The Lower School, currently empty, has a capacity of 150-200. It would be unable to house 1050 pupils.

Parents have not been encouraged to move their children from Raine's. On 7 May 2019, the LA decided to rescind the offer of places to year 6 students to attend the school in year 7, and year 11 students to attend or apply to the School's 6th Form for 2019-20 on the basis that there was a proposal to close the School and if it was passed, it would severely disrupt these students' education. In July 2019, the LA revoked that initial decision and both wrote to parents of affected potential year 7 students (on 19 July 2019) and updated the school website to make clear that the offers and acceptances of places for pupils in year 7 and year 11 intake are valid, if the parents choose to send their children to Raine's. The LA has also informed parents of the proposal for Raine's School to close in August 2020, in order that they may make an informed decision.

To state that parents were not encouraged to move their children does not tally with the statements that I have read from parents who stated that they were pressurised to find alternatives during the year and also at the start of September 2019. If LBTH had any integrity it would write to all parents asking about their experience, regardless of the decision to close the school. The school adjudicator did not agree with LBTH plans to close year groups, but anyone with a child who had been told that a year group was not going to be open, had found an alternative and then informed during the summer holidays that they could change back would be reluctant to confuse their child. The plans of LBTH to apply a zero PAN were obviously not of any merit to the school adjudicator and that is the only reason they were withdrawn. Nevertheless the objective had already been met, to ensure the roll of the school was even more diminished. GCSE students were seen being told to go and sign up for Oaklands Sixth form. To accept a statement from education officers 'that this did not happen' is really unacceptable. The only way to truly scrutinise is to ask the parents and children.

There would also be other faith school places accessible in Tower Hamlets at Bishop Challoner and Canary Wharf secondary schools.

This statement is in relation to LBTH belief that these other faith schools may be an option that parents would consider alongside the only other borough CofE choice (Sir John Cass). I would question why the inclusion of non Church of England schools would be considered a viable option? The reason Church of England Schools and Roman Catholic Schools exist is to cater for children of those denominations.

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

There is no mention at what date the Local Fair Access Protocol was suspended in relation to Raine's pupils. The GB minutes indicate that the level of behavioural challenge was high and indeed it was stated in minutes 18 March 2019 that there was an issue in YR7 due to presenting with significant behaviour issues.

There has also been significant investment in the development of the School's 6th Form, however, this did not result in a significant boost in pupil numbers.

Again a very vague statement. Is this in relation to work carried out at the Lower School Site? Originally this work was planned for the THRIVING (according to LBTH) Raine's Sixth Form, but of course they have never had a chance to benefit from it, let alone boost pupil numbers through it. This privilege has been saved for Oaklands who have gained students who wanted to join Raine's Sixth Form but were advised not to. (Please ask children and parents about this rather than council officers and Oaklands staff).

Of course little mention is made elsewhere of the successful Raine's Sixth form. Governing Body minutes refer to an oversubscribed Sixth Form and in 2017 was in the top 30% of providers

Data from compare-school-performance-service.gov.uk

16-18 (sixth form)	Progress Scores between end of KS4 and end of A levels/equivalent		
	2016	2017	2018
A level progress			
Raine's	Average	Well above average	Average
Oaklands	Below Average	Average	Below Average
Bread Vocational			
Raine's	Above Average	Average	Average
Oaklands	Average	Average	Above Average
All Academic			
Raine's	Above Average	Well above average	Average
Oaklands	Below Average	Average	Below Average

nationally.

The LA and the leadership of both Oaklands and Raine's are aware of the different demographics of the two school communities. The schools and the LA are united and absolutely clear that the underlying principles in any potential joint venture or activity moving forward should be tolerance, respect and cooperation in line with 'British Standards and Values'.

This is in relation to the abuse that children and their families were subjected to on a visit to Oaklands which promoted Ms Canavan to write letters of apology. You state that the leaders of both schools are aware of the different demographics. Firstly I should point out that the leadership of the two schools are the same. Oaklands are already controlling Raine's as you well know. Secondly if you are aware of the demographics why have you made no mention or consideration to the fact that the main demographic of Oaklands are the third highest attaining group nationally, whilst the main demographic group of Raine's is the lowest attaining group. How you can make a comparison of results with no recognition of this seems very unfair and somewhat lax.

Additionally, in May 2017 the School had to apply for a licensed deficit from the Council of £1m,

This is the amount which LBTH insists was for a period of 3 years. I have requested, complained and am currently in correspondence with the ICO. OFSTED and GB minutes refer to a 5 year loan. I have requested a signed copy and supporting documentation of this. The one that I eventually received is unsigned, for £1.1 M and for 5 years. Where is the actual loan agreement for the correct amount?

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

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

The LA answer to the concerns about conflict of interest is a fudge. Patrice Canavan was a part of the IEB who were supposed to support the school, but who in almost indecent haste voted to close Raine's and expand Oaklands. That is a conflict of interest since her school needs to expand in order to remain financially viable. The unsubstantiated allegation of pecuniary interest would rather depend on salaries attached to the newly expanded Oaklands. The Steering Group is a marketing ploy with no real power at the moment. From comments I have seen there is no confidence in the Steering Group from Raine's parents.

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

Where is the proof of this? Are there minutes of meetings or letters to show who was involved? Are John Cass even aware that you are stating this as a fact?

However, it is evident from the responses to the public consultation that this view is not held by the majority of respondents.

This refers to the fact that the majority of respondents were against the closure of Raine's. What was the purpose of the consultation? Over 3000 signed a petition to save the school. Despite all this you are closing the school due to low numbers. Why didn't the LA just do that last year. If there was no purpose to the consultation why was it carried out?

On the national GCSE benchmark of the percentage of pupils achieving grade 5/C or above in English and maths, Raine's average student score was significantly below both the Tower Hamlets and national averages in 2015/16 (Raine's average of 35% in comparison with TH average of 63%), 2016/17 (Raine's average 30% in comparison with TH average of 44%) and in 2017/18 (Raine's average of 22% in comparison with TH average of 44.8%).

This takes no account of the completely demographics of schools locally and nationally. Nationally the percentages of Bangladeshi (main demographic of Oaklands) and White British (main demographic of Raine's) as published by gov.uk. (All that Group, Free School Meals, Non Free School Meals)

2017.	White British.	Bangladeshi
All.	42.7	49.1
FSM.	16.7	38.9
NonFSM.	52.4.	46.0

You can see the huge gap between groups that disadvantaged White British children have nationally. Tower Hamlets has the 5th lowest score for this group in the country. Of course this is not acceptable either locally nor nationally but closing a school is not going to solve this problem. It is a debate which has been going on for some years now. Of course your aim would be for all children to be achieve well and of course the local schools that are achieving this are to be congratulated but do not blame one school for a national problem, and especially not one with such a high level of disadvantage, child protection and behaviour challenges.

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.

Apart of course from closing a school in a clean air area near to a park, whilst. Hildren transfer to schools eg Bow where their health is put at risk.

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.

This statement is just not good enough. Children are at risk from bullying, violence and harassment. There have already been incidences. What are you actually doing?

APPENDIX 5

During the period September 2016 to June 2018 the Governing Body referenced Academisation on four occasions but no action was taken by the Governing Body of Raine's to progress either federation or academisation.

Having read through all the Governing Body Minutes for that period the references to Academisation were actually in reference to any potential threat that may have existed and not in relation to any move or want for such.

There is no talk of federation other than asking whether John Cass is in a position to support the school.

The only other references to an Academy are in relation to the Basketball Academy at the school and whether this could be expanded into other sports.

Why does appendix 10 only show budget share for years 7-11? The consultation paper also ignored money received for sixth form pupils. Shouldn't a financial document show all income? The sixth form are not housed in a separate building, therefore I can see no reason to ignore it.

Sent: 28 November 2019 20:26

To: school organisation

Subject: Reply to Statutory Notice Proposal to close Raine's Foundation School

Dear Sirs

Please find attached the representation from Raine's School Foundation.

kind regards

Carole Day

Chair, Raine's School Foundation

STATUTORY PROPOSAL TO CLOSE RAINE'S FOUNDATION SCHOOL

SUBMITTED REPLY BY RAINE'S SCHOOL FOUNDATION

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

Raine's Foundation School, Approach Road, London E2 9LY which includes:

Raine's Foundation School, Old Bethnal Green Road, London E2 6PR

Voluntary Aided School: Raine's does NOT have an underlying Church Trust. This seems to be a common misconception. Raine's is the more unusual type of VA School with a Trust which is the Raine's School Foundation (the "Trust"). The Trust owns School land, and 100% of both buildings, detailed above.

The Trust's position as the major stakeholder was deliberately overlooked on numerous occasions such as in January 2016 when a new Governing Body was formed and in 2018/19 when the future of Raine's was discussed without Trust knowledge. When closure became the clear outcome desired by LBTH/LDBS, the Trust had to fight tooth and nail for representation on both the IEB and Steering Committee which finally succeeded in October 2019 in order to protect the local community and its own future.

2. Implementation:

The original public consultation begun in June was a proposal to CLOSE Raine's (including plans to expand nearby Oaklands). Now there are two parallel consultations. Different wording is being used by LBTH for the proposal: is there a difference between "close" and "discontinue"? Amalgamate or not amalgamate?

LBTH had already partly implemented closure before the end of the informal consultation period in the summer 2019. LBTH writes that one option for Raine's is for no changes to Years 7 through to 13. This is impossible. Three year groups have already been closed down without authority of the DoE; LBTH and the IEB have been strongly criticized by the School's Adjudicator for this behaviour.

Last summer LBTH prevented any Year 7 students from joining Raine's even when some turned up on the first day of term. Despite this, more than 30 students have still applied for 2020.

There are no Year 10s. The Oaklands-led SLT coerced parents to move Raine's children from Year 9 (although the school is bound by law to provide these children with their education). Despite extreme pressure, a handful still turned up in September 2019. They were forced to endure long days in the LSU, given no timetable and only some drawing to do. Steady coercion forced these individuals to leave over the following two weeks. Most preferred NOT to join Oaklands.

Year 12 were also coerced to leave Raine's when they were given their GCSE results in the summer as the Oaklands led SLT told students there would be no Year 12. This all amounts to predetermination of the proposal as pupil numbers affect the Equality Impact Assessment and determine pupil income and financial viability.

Even now, if a parent fills in an online form for the 6th form on the Raine's website, they should be sent an application. This is not being done. Example of another foregone conclusion.

3. Closure

Financial Reasoning: Over 300 children have already been moved on by the Oaklands-led SLT and LBTH-formed IEB. This was a deliberate action to cause an "unrecoverable budget deficit". The Trust and many others have submitted Freedom of Information requests to see the signed licensed deficit document from 2017. This document was previously cited as a strong reason for financial distress, now LBTH omit any mention of this document. The signed document does not exist (which has been confirmed by Rezaur Choudhury at LBTH) and therefore the debt/loan cannot be proven or surely officially recognized? The Trust has spoken at length with Sir Alasdair McDonald who works for LBTH and THE Partnership and is a member of the IEB looking after finance, but he also had no details of the document. Has a financial audit been carried out and were auditors happy with the lack of signed Licensed Deficit/loan documentation?

The Statutory Notice mentions two instalments of a £1m loan of £250k and £750k, yet in the "draft licensed deficit recovery plan", it details one sum of £1.1m. It also says that the sum of £250k was not necessary. Without proper signoff, where is the proof that this loan figure is correct?

We note that this Licensed Deficit/loan is no longer included in the amount of debt owing as at 31 March 2019 Cabinet notes say there was "an accumulated debt of £0.91m". The Statutory Notice

says there is an “unrecoverable cumulative budget deficit of £0.91m”. Has the loan of £1m, £1.1m or £750k been written off?

The Trust requested and attended 2 meetings in the summer to review the school’s budget. The Head and Sir Alasdair had been ordered by Mrs McInnes of LBTH to not allow any copies to be taken from the room for further analysis. Indeed the first set of numbers were deliberate gibberish. This behaviour has prevented/delayed the Trust from devising an appropriate plan to help the school.

Please note the draft recovery plan says the school will return to a comfortable in-year balance once the loan is paid off. Also in Governing Board minutes of May 2018, the GB was confident that finance was looking much more positive. As the Oakland-led SLT and LBTH have coerced 3 year groups to leave Raine’s they have brought about financial difficulty which could have previously been resolved without closure of Raine’s.

Admissions: Applications from 2011 to 2015 were significantly affected by building work as part of Building Schools for the Future (BSF). Half of the Upper School building was demolished and rebuilt causing children and teachers to work from portacabins. The School deliberately kept numbers lower due to capacity issues. LBTH has continued to ignore this fact in their admission tables and offered no support in 2014 when the building work was complete.

LBTH endorsed the BSF investment by national government of over £20m guaranteeing that Raine’s School had a good future for the next ten years. In a LBTH planning permission document for a Raine’s Lower School Sixth Form dated 2018, LBTH described Raine’s as “thriving”.

Land and Buildings Ownership: 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. However, it would appear that LBTH has long planned to bestow Raine’s Lower School to Oaklands. Strangely this was discussed only between LBTH and LDBS. LBTH and LDBS also 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.

Use of Lower School was broached by LDBS but the Trust made it very clear they were not happy with proposals to both Inigo Woolf and Christine McInnes. The Trust also informed the Chair of the IEB that the feasibility study to close Raine’s was fundamentally flawed as the Trust had not agreed to use of Lower School by Oaklands. The Trust was emailed by Mr Coughlan of LBTH for the first time on 14 October 2019 despite the fact that the Trust had issued a letter of trespass dated 15 August to Christine McInnes, Meloneze Wynter, Diana Choulerton, Patrice Canavan, Inigo Woolf, Winckworth Sherwood and the Oaklands Business Manager. This letter was also shared with the Department of Education. The Trust was forced to resort to legal action as its wishes were being ignored by Christine McInnes and Inigo Woolf who carried on with building work in the summer regardless of the Trust’s displeasure and instructions. This was a blatant attempt to install Oaklands before any decision had been made by Cabinet and any Statutory Notice period had begun. Thereafter there was still no contact from either party with the Trust regarding the Lower School.

Any delays are totally of LBTH's making and this matter is currently in the hands of the Trust's valuation experts and lawyers. As you would expect, the Trust is exploring all options for the future.

Who proposed closure?: At the consultation meeting on 11 November 2019, Terry Bryan said LDBS had approached LBTH to close Raine's. Kate Roskell from LDBS replied that it was the other way round. LBTH said that alternatives to closure were discussed between LDBS and the IEB on 16 and 30 November*. Mr Woolf, CEO of LDBS emailed the Chair of the Trust to say he has never had a meeting with the IEB and never had meetings with Tower Hamlets. Ms Roskell wrote there were discussions between LDBS and LBTH which were followed up at IEB meetings which remain confidential. Blame is being thrown between the parties as both know that they have failed to inform or negotiate at all with the Raine's Trust.

*Note: the Chair of the Trust, members of the public and press have requested IEB minutes of 16 and 30 November (deemed confidential) and have been met with a wall of silence. One irrelevant document emerged almost totally redacted. Discussion of alternatives is a matter of public interest and not confidential and should be shared at least with the Raine's Trust.

Alternatives: The Trust should have been included in all discussions about alternatives to closure, some of which were apparently held 16 and 30 November 2018.

Rather than hire a new dynamic Head to guide Raine's back to success 2016/17, the new GB promoted the Deputy Head advised by Mrs McInnis of LBTH. On her resignation in September 2018, the GB Chair at least had the foresight to appoint Paul Woods of Sir John Cass as Interim Head to protect the children. Mr Woods did an impressive job of turning Raine's around from September to December 2018 and was much praised by Ofsted. But LBTH were not happy with this progress.

In January 2019, the Chair of the Trust was informed that Oaklands was being considered as an interim support school but that this was still confidential. The Trust was unrepresented on the IEB despite repeated protest and had no idea what was being discussed. The next communication from LBTH was a phone call on 30 April to say they would be consulting to close Raine's and expand Oaklands. All ensuing communication from LBTH has been highly aggressive which is not conducive to successful negotiation.

LBTH Children's Services is not a fan of academies and there is much evidence in GB/IEB minutes of this. Indeed Mrs McInnes makes a grand play of options discussed by the 2013/14 GB to become an academy. However, NO APPLICATION TO BECOME AN ACADEMY WAS EVER MADE which can be backed up by the former Head, Mr Gordon Clubb. Sadly his successor was not of the calibre to keep Raine's at Good let alone return back to Outstanding. Results suffered during his tenure although Mr Bradshaw had strong relationships with Terry Bryan, Terry Parkin and Sir Alasdair at LBTH.

A very good alternative to closure would have been a Federation with a school of similar ethos. The clear option would have been the oversubscribed Sir John Cass. However, Sir John Cass and Mr Woods were never even approached by LBTH to form a federation and in Cabinet notes LBTH seem to think SJC should have made the first move.

Of course, there are other options which have not been explored such as a Raine's Sixth Form.

Below standard GCSE results:

LBTH demonstrated very bad timing and no consideration for students as they released information about School closure shortly before the GCSE examinations which had a significant effect on performance. Raine's children have coped well in extreme circumstances. LBTH enforced a £1m cut in staffing in 2017 down to its bare bones, which not only led to lack of regular teachers but also caused poor behaviour and absenteeism. The GB was heavily influenced by a Targeted Intervention Group installed at School by LBTH from 2016-18. Exactly who is LBTH trying to pass the blame on to for below standard results?

Raine's summer 2019 Progress 8 score showed a vast improvement at -0.38 (from -0.84) proving how much could be done with just a little concerted effort in a short amount of time.

Disadvantaged White British children are not only the lowest attainers nationally, but research has found that as they get older the situation becomes more acute. By contrast, Oaklands' largest ethnic group is amongst the highest attainers nationally. By trying to evacuate Raine's children, LBTH will succeed in "hiding" them rather than proactively supporting Raine's to buck national trends. Hence it makes no sense in comparing Raine's with Oaklands.

4 Pupil Number and admissions

The PAN of 150 would imply a total of 1050 although there is not capacity for that number of pupils in its two buildings. When the Lower School was closed for upgrading in 2016, capacity became only 750. Using the published PAN and capacity as an argument to prove the school is undersubscribed is infantile. The school now has approx 217 on roll because LBTH has run the school down and the Oaklands team have pushed out Year 7, 10 and 12. Children and parents wished to go to Raine's but have been prevented. After Xmas there will be less than 200. However, children are not choosing Oaklands as their school of choice. There has long been animosity between students of these two schools (evidenced by a nasty Raine's introduction event at Oaklands in the summer). Oaklands pupils this month have been witnessed racially abusing other children in the street (with their teacher present).

More details of Pupil numbers and admissions can be seen in the Trust's email to the Schools Adjudicator dated 18 September. The Schools Adjudicator has criticized the IEB and LBTH for failure to comply with legislation. LBTH has carried on regardless.

5. Displaced pupils

Oaklands is already brimming over due to overzealous "evacuation" of Raine's students (perhaps to boost their own income figures) demonstrating a conflict of interest, before they had properly secured sufficient accommodation. Indeed they are still heavily advertising for sixth formers when it is assumed there is no guaranteed place for the sixth form to sit. The recent behaviour by LBTH and Oaklands have made local parents very angry and many parents will avoid Oaklands at all cost. Some parents are moving their children from Raine's at Xmas in order to avoid the planned move en masse to Oaklands in the summer. We assume that LBTH has requested Ofsted not to inspect for the time being as they are over capacity, though the last full inspection was in 2013.

Displacing Christian children: LDBS and the Diocese are flippant about their options for a Christian education. They know the local Christian secondary schools are oversubscribed. Terry Bryan LBTH and Inigo Woof LDBS simply say Raine's displaced children wanting to join a Christian school can

go to the top of the waiting lists of oversubscribed schools. This does NOT get them places. 47% of Raine's children identified themselves as Anglican. Simply because Bethnal Green has an overwhelming Bangladeshi Muslim population does NOT mean Christians should have their choice removed. The Trust is deeply disappointed in the Diocesan authority and finds its behaviour puzzling

LBTH writes: "There has been a significant decline in the number of applications for children from CofE primary schools to Raine's over recent years and this mirrors the decline in the borough's Christian population as evidenced by the last national census, where Tower Hamlets had the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent." Does this mean Christians should be pushed out of the Borough? Terry Bryan was openly and strongly against a Christian admission policy in the case of oversubscription. This made absolutely no difference at all to admissions but 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.

No matter how many Raine's students move to Oaklands, they will still be a minority racial group which given previous evidence, will cause extreme tension.

6. Impact on the Community

Raine's does provide use of its building to at least two churches for regular worship. Schools Plus lets out the premises and community usage is heavy which also makes money for the School. The Oaklands/Raine's Executive Head could easily arrange even more community use if she were minded to. The Trust has allowed Raine's School to use its premises free of charge and has no responsibility over usage out of school hours at this time.

The Trust has a very strong sense of community and is a committed supporter of local families (who over decades have benefitted from its generous annual bursaries scheme paid to former students, numbering around 70 this year). The Trust would continue and potentially increase community use of its premises in the case of Raine's closure in 2020. However, the Trust will have to reconsider which methods to use to replace its bursary scheme as there will no longer be any Raine's students to benefit.

NB: the Trust has never offered maths or sports scholarships (as wrongly suggested by LBTH) which were introduced to Raine's in 2015/16 by John Bradshaw and Terry Bryan. These were not properly documented or costed at the time of their introduction and teachers have subsequently been required to use their own unpaid time to fulfil teaching of these scholarships when they are already under extreme pressure.

8. Balance of denominational provision

The notice states that "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". The local authority is under much greater obligation than that. On 10 October Judge Johnson stated that LBTH had to carry out a full Equality Impact Assessment. During this Oral Review at the RCJ, LBTH said they had not completed an EIA but had allegedly begun one. The Judge asked for written proof, but there was none. Therefore the Judge said an

EIA had to be completed BEFORE the Statutory Notice. The EIA presented at Cabinet is inadequate. Has this EIA been passed to an outside authority for independent scrutiny?

Religion is only one of the subjects for an EIA. LBTH has not addressed the impact on the large percentage of Black and White children at Raine's which are not only the minority in the Borough but also the most disadvantaged. The largest ethnic group is noted as 31% White British. There are several categories of Black and Caribbean children which totals at least 36% which is another large group unrecognised in the EIA. When they are dispersed into other schools in the Borough they become minorities which can have significant impact to their safety. As LBTH has the highest percentage of disadvantaged children in the UK at 57%, Raine's children should be given the greatest care and attention.

At the consultation meeting on 11 November, the LBTH/LDBS panel were questioned repeatedly about safeguarding. Already displaced children had struggled after being moved. It seems that the evacuation of as many Raine's children as possible was not followed up by LBTH to see how these children were coping. The Trust has evidence of bullying, threatening behaviour towards and mugging of Raine's children since September. After some pressure at the meeting and from staff, it appears the Exec Head is reaching out to other schools, but it is unknown what if any positive impact this will have.

Another child who was forced to join Bow School (sited directly on top of a heavily used road) was off sick from School with asthma and eczema. LBTH has shown no duty of care whatsoever to ensure the wellbeing of these children.

The LA does not consider air quality as a significant factor to keep Raine's open in Approach Road next to a leafy park. A report published today by King's College London found roadside air pollution stunted lung growth in children by 13% in London and it is the most vulnerable that are hit hardest. Perhaps the LA should consider children's health before their already large coffers.

The children still at Raine's are some of the heavy cohort of CP children reported at a GB meeting in 2017. (Terry Bryan of LBTH laughed at this meeting on 11 November saying it could not be true that there were 210 in 2017 although he placed them at Raine's himself). Mr Woods, while interim Head, commissioned a safeguarding audit in November 2018 due to the extraordinarily large amount of children with CP orders. Mrs McInnes refused to provide the details of this audit when requested. Debbie Jones, LBTH said that they will help if problems are reported, but which bullied children are going to make official written complaints? Raine's Staff have raised the issue of extra pastoral support with the Exec Head, Patrice Canavan, who has acknowledged the request but so far done nothing. Parents at the consultation meeting on 11 November expressed their worries and concerns about their children but nothing is being done for them during this difficult period.

10. Sixth Form Provision

The Raine's Sixth Form has had an excellent reputation and has been regularly oversubscribed with over 200 students, only declining when the LBTH intervened recently. It also has a long history of Good Ofsted. The large number of Bursary applications for high quality universities made to the Trust are testimony to the excellence achieved by the Sixth Form for many years. The more recent Raine's Basketball Academy was also highly praised by Ofsted. LBTH has now disbanded this academy dispersing students all over London.

In addition, for many years 100% of children leaving Raine's went on into education, training or employment which far exceeded Oaklands' record until 2018.

11. Special Needs Provision

This statement in the Statutory Notice is nonsense. Raine's has always had an excellent Special Needs provision. In addition Raine's has also had an extraordinary number of students with short-term Child Protection orders. The SEN funding budget this year is £119,526 providing for 43 SEN students.

12. Travel

This Statutory Notice is about closing Raine's only. Another consultation exists to increase the PAN of Oaklands. LBTH made clear these are separate issues but run in parallel. However, most Raine's children do not wish to go to Oaklands. Children who are currently leaving Raine's are choosing schools such as Bishop Challoner, Morpeth and Mulberry and even some Hackney schools like Haggerston and preferring to travel rather than join Oaklands. LBTH have probably reduced the number of white and black students now coming from outside the borough for a Christian education and indeed this will reduce travel. It is suggested that the general population of East London is realizing LBTH is generally no longer the best place to get a good education (especially as a Christian) as no schools are safe from closure especially in light of the sharp proposed increase in reduction in PANs in primary and secondary schools. This could quite easily snowball into a steady aversion for education in Tower Hamlets as neighbouring Boroughs have a better Christian school provision. This will increase travel from LBTH to other Boroughs.

NB As a matter of good order it should be pointed out that online questions asked at the Statutory Notice consultation meeting on 11 November have still not been answered. Enquiries reveal this may only be done after the Notice Period ends on 2 December. It could be suggested that this is yet another attempt to hinder proper process.

Dated: 25 November 2019 and submitted on behalf of all members of the Raine's School Foundation.

Sent: 30 November 2019 22:46
To: school organisation
Subject: Objection to Statutory Notice to Close Raine's

Dear Sirs

Please find attached my response to the Statutory Notice.

kind regards
Carole Day

REPLY BY CAROLE DAY (FORMER STUDENT, GOVERNOR AND NOW TRUSTEE)

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

Raine's Foundation School, Approach Road, London E2 9LY which includes:

Raine's Foundation School, Old Bethnal Green Road, London E2 6PR

Voluntary Aided School: Raine's does NOT have a Church Trust and many authorities are under this misconception. The underlying Trust is the Raine's School Foundation.

NB: Raine's went grant maintained in the early 1990s – another VERY important factor.

The Trust owns School land, and 100% of both buildings above (NOT shared with LDBS).

2. Implementation:

Implementation started surreptitiously four years ago. The Trust led Governing Body was forced to resign in December 2015 by Children's Services. Debbie Jones alleged it was in special measures which it was not and said it was in deficit which with over £400k at year end it was not. Soon thereafter in 2016 it is recorded in Governing Body minutes that LBTH started making enquires and assumptions about ownership of School property and land. Subsequently, a steady undermining of the new GB by LBTH ensued over nearly 3 years; the Trust was unwelcome in this forum and Parents and Staff were unrepresented. After unhelpful intervention, this GB was also forced to resign. There was a glimmer hope when Liz Wovlerson hired the interim Head Paul Woods who made a staggering improvement in Raine's in 3 months. In December 2018 Ofsted were delighted.

However, at two meetings of the LBTH-led IEB in November 2018, we are told that alternatives to closure were discussed but nobody has been allowed to see these minutes though this is a matter of public interest. The Trust was also kept in the dark. The Trust first met the Chair of the IEB in January 2019 who informed her Oaklands would be the new support school. No mention of closure or amalgamation. There was again complete silence until 30 April when (after prompting) Christine McInnes finally called to say they were starting a consultation to close Raine's.

THIS IS A CLASSIC EXAMPLE OF HOW NOT TO CLOSE A SCHOOL!! Imagine not speaking to the man stakeholder. Is this incompetence or a deliberate act? Why the haste?

When the consultation was announced, it appears a feasibility study had taken place in February 2019. Sir Alasdair MacDonald, working for LBTH and knighted for services to education, coauthored this study. Sir Alasdair will have understood Raine's Voluntary Aided status and should have consulted the Trust. However, he simply had a chat with LDBS about Raine's property that he thought appropriate/convenient to gift to Oaklands. A peculiar decision.

LBTH had already partly implemented closure before the end of the informal consultation period in the summer 2019. LBTH writes that one option for Raine's is for no changes to Years 7 through to 13. This is impossible. Three year groups (7, 10 and 12) were clumsily closed down before September without authority of the DoE; LBTH and the IEB have been strongly criticized by the School's Adjudicator for this behaviour.

Early unofficial closure of Raine's has been facilitated by the Oaklands SLT. The Exec Head and Head were transferred to Raine's to carry out the plan in an attempt to move into Raine's Lower School in September 2019. This is a complete CONFLICT OF INTEREST and not legal.

3. Closure

Financial Reasoning: Over 300 children have already been evacuated by the Oaklands-led SLT and LBTH-formed IEB. This was a predetermined deliberate act to cause an "unrecoverable budget deficit". The previous Governing Body was confident they had turned round finance in 2018.

LBTH financial records are incomplete and there should be an immediate audit due to financial mishandling of the Licensed Deficit. LBTH have confirmed that there is no signed Licensed Deficit with Raine's in 2017 yet they remain unconcerned. The draft plan refers to a loan of £1.1m not the £1m mentioned by LBTH in the consultation. LBTH should be asking questions about this discrepancy and also why Raine's was forced to pay for the entire restructuring which annihilated staff numbers leaving students without proper care and teaching. The restructuring plan was commissioned and agreed by LBTH.

The Statutory Notice mentions two instalments of a £1m loan of £250k and £750k (no longer referring to it as a Licensed Deficit), yet in the "draft licensed deficit recovery plan", it says that the sum of £250k was not necessary. All of this is incredibly worrying and LBTH should take immediate action to investigate potential fraud.

We note that the words "Licensed Deficit" are no longer included in the amount of debt owing as at 31 March 2019 Cabinet notes say there was "an accumulated debt of £0.91m". Has the loan of £1m or £1.1m been written off?

The Trust requested and attended 2 meetings in the summer to review the school's budget. The Head and Sir Alasdair had been ordered by Mrs McInnes of LBTH to not allow any copies to be taken from the room for further analysis. This lack of cooperation has prevented/delayed the Trust from devising an appropriate plan to help the school.

Admissions: Applications from 2011 to 2015 were significantly affected by building work as part of Building Schools for the Future (BSF). Half of the Upper School building was demolished and rebuilt causing children and teachers to work from portacabins. The School (in agreement with LBTH) deliberately kept numbers lower due to capacity issues. Yet now LBTH has continued to ignore this fact in their admission number tables which are highly inaccurate.

Land and Buildings Ownership: LBTH has not engaged in any discussion whatsoever about Upper School building with the Trust. Does it have more plans which it refuses to share? The Trust was told that LBTH would share its plans for Trust legacy in the Borough only once closure had been decided. However, LBTH did find it appropriate to collaborate with LDBS regarding Lower School. The LDBS is totally distinct from the Trust and has no authority to discuss Trust issues whatsoever. The Trust finds it distressing that LDBS would discuss transfer of land/buildings of a Church of England School which it didn't own to a non-faith school. Why?

LBTH and LDBS continued to railroad the Trust by upgrading the 100% owned Trust building in the summer disregarding all Trust communications. Finally, frustrated, the Trust was forced to take action and issued a legal letter of trespass to LBTH, copied to LDBS, the IEB and Oaklands staff.

It should be emphasized that the Trust has been constantly omitted and left in the dark. Any attempt at discussion with LBTH has been met with outward aggression or stoney silence. Attempts to discover information from IEB minutes have been constantly and deliberately thwarted.

Alternatives:

Closure is not a foregone conclusion. The Trust should have been included in all discussions about alternatives to closure, some of which were apparently held 16 and 30 November 2018. Federation in particular with another faith school should have been fully discussed and a feasibility study commissioned. A Raine's Sixth Form is also a very strong possibility.

Below standard GCSE results:

LBTH demonstrated very bad timing and no care about students as they released information about School closure shortly before the GCSE examinations which had a significant effect on performance. LBTH enforced a £1m cut in staffing in 2017 down to its bare bones, which not only led to a lack of regular teachers for good learning, but also caused poor behaviour and absenteeism. The GB was guided by a Targeted Intervention Group installed at School by LBTH from 2016-18. LBTH is to the blame for below standard results.

Raine's summer 2019 Progress 8 score showed a vast improvement proving how much can be done with a little concerted effort in a short space of time. LBTH spent so much time trying to close Raine's that they let down the children, many of whom are some of the most disadvantaged and vulnerable in the Borough.

Disadvantaged White British children are among the lowest attainers nationally. By contrast, Oaklands' largest ethnic group is amongst the highest attainers nationally. By trying to evacuate Raine's children, LBTH will succeed in "hiding" them rather than proactively supporting Raine's to buck national trends. It makes no sense in comparing Raine's with Oaklands.

4 Pupil Number and admissions

The PAN of 150 would imply a total of 1050 although there is not capacity for that number of pupils in its two buildings. When the Lower School was closed for upgrading in 2016/17, capacity became only 750. Using the published PAN and capacity as an argument to prove the school had been dramatically undersubscribed is ridiculous and the Schools Adjudicator has been informed. The school now has approx 217 on roll because LBTH and the Oaklands team have pushed out Year 7, 10 and 12. Children and parents wished to go to Raine's but have been prevented. After Xmas there will be less than 200. However, children are not choosing Oaklands.

LBTH is cutting primary and secondary Christian schools in the Borough excluding choice for Christian families. (see the comment on admission policy below.)

5. Displaced pupils

Oaklands is already over full due to overzealous "evacuation" of Raine's students before they had properly secured sufficient accommodation compromising safety. Indeed they are still heavily advertising for sixth formers when there is no certainty of accommodation. Some parents are moving their children from Raine's at Xmas in order to avoid the planned move en masse to Oaklands in the summer.

Displacing Christian children: LDBS and the Diocese are flippant about options for a Christian education. They know that local Christian secondary schools are oversubscribed. Terry Bryan LBTH and Inigo Woof LDBS simply say Raine's displaced children wanting to join a Christian school can go to the top of the waiting lists of Christian schools. This does NOT get them places. 47% of Raine's children identified themselves as Anglican and are facing discrimination. Simply because Bethnal Green has an overwhelming Bangladeshi Muslim population does NOT mean Christians should have their choice removed. The Trust is deeply disappointed in the Diocesan authority and finds its behaviour puzzling

LBTH writes: "There has been a significant decline in the number of applications for children from CofE primary schools to Raine's over recent years and this mirrors the decline in the borough's Christian population as evidenced by the last national census, where Tower Hamlets had the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent." Does this mean Christians should be pushed out of the Borough? Terry Bryan is openly and strongly against Christian admission policies in the case of oversubscription. This made absolutely no difference at all to admissions at Raine's but suggests his strong discrimination against the Christian population. The outstanding Christian state school in the Borough has a large (85%) Muslim student population because of the high quality of education. However, having removed oversubscription rules within LBTH admission policies for Christian students, this means Christian students now struggle to get into Christian schools therefore Christian education is being withheld and diluted.

No matter how many Raine's students move to Oaklands, they will still be a minority racial group which given previous evidence, will cause extreme tension.

6. Impact on the Community

Raine's does provide use of its building to at least two churches for regular worship. Schools Plus lets out the premises and community usage is heavy. The Trust has allowed Raine's School to use its premises free of charge and has no responsibility over usage out of school hours at this time.

The Trust has a very strong sense of community and is a committed supporter of local families. The Trust would potentially increase community and educational use of its premises in the case of Raine's closure in 2020. With no more Raine's students, the Trust's bursary scheme would gradually come to an end meaning local children will have less money for their further education.

NB: the Trust has never offered maths or sports scholarships (as wrongly suggested by LBTH and never funded teaching at Raine's as this is the domain of the LA.

On 10 October Judge Johnson stated that LBTH had to carry out a full Equality Impact Assessment. During this Oral Review at the RCJ, LBTH said they had not completed an EIA but had allegedly begun one. The Judge asked for written proof, but there was none. Therefore the Judge said an EIA had to be completed BEFORE the Statutory Notice. The EIA presented at Cabinet is inadequate. Has this EIA been passed to an outside authority for independent scrutiny?

LBTH has not addressed the impact on the large percentage of Black and White children at Raine's which are not only the minority in the Borough but also the most disadvantaged. The largest ethnic group is noted as 31% White British. There are several separate categories of Black and Caribbean children which totals at least 36%, another large group unrecognised in the EIA. When dispersed into other schools in the Borough they become minorities which can have significant

impact to their safety. As LBTH has the highest percentage of disadvantaged children in the UK at 57%, Raine's children should be given the greatest care and attention.

At the consultation meeting on 11 November, the LBTH/LDBS panel were questioned repeatedly about safeguarding. Already displaced children had struggled after being moved. The evacuation of so many Raine's children was not followed up by LBTH. The Trust has evidence of bullying, threatening behaviour towards and mugging of Raine's children since September. After some pressure at the meeting and from staff, it appears the Exec Head may be reaching out to other schools, but it is unknown what if any positive impact this will have.

Another child who was forced to join Bow School (sited directly on top of a heavily used road) in September was off sick from School with asthma and eczema. LBTH has shown no duty of care whatsoever to ensure the wellbeing of this child. The LA does not consider air quality as a significant factor to keep Raine's open in Approach Road next to a leafy park. A report published by King's College London this week found roadside air pollution stunted lung growth in children by 13% in London and it is the most vulnerable that are hit hardest. The LA seems to put money before children's health.

The children still at Raine's are some of the heavy cohort of 210 CP children reported at a GB meeting in 2017. (Terry Bryan of LBTH laughed at this meeting on 11 November saying it could not be true that there were 210 in 2017 although he placed them at Raine's himself). Mr Woods, while interim Head, commissioned a safeguarding audit in November 2018 due to the extraordinarily large amount of children with CP orders. Mrs McInnes refused to provide the details of this audit when requested. Debbie Jones, LBTH said that they will help if problems are reported, but which bullied children are going to make official written complaints? Raine's Staff have raised the issue of extra pastoral care.

LBTH needs to rethink the value of community engagement and try much harder. They may even get some votes back.

8. Balance of denominational provision

The notice states that "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". Quite clearly the Church (separate to LDBS) is very concerned about the recent turn of events and the strategic direction locally of closing Raine's. Comment is also made to the secretive nature of LDBS management and lack of transparency.

It is important for this consultation to consider the opinion of the Deanery Synod. They last met on 15 October 2019 to discuss "Our Church Schools and the LDBS". Notes of the meeting are available on their website: www.thcofe.org. At this meeting, the closure of Raine's was described as a "PASTORAL DISASTER" and the issue was the subject of a letter to the Bishop of London.

"The failings of the LDBS were considered but also the actions of the local council and the politics of the decision."

"It was felt that there was a lack of pastoral care at the LDBS and more compassionate leadership would be welcome." Further points quoted:

- Caution was expressed about closing schools without a long-term plan. What is lacking is a coordinated response from the LDBS about their strategic direction.

- An opportunity exists to make the LDBS in a different model, ie more reactive, less secretive and open to more scrutiny. Better governance and management are needed.
- Conflict exists due to there being two appointing bodies, the LDBS and the LA. Better relationships need to exist between these bodies and more transparency is needed.
- The local authority executive can be wary of a CofE education. Again, a better relationship is needed.

10. Sixth Form Provision

The Raine's Sixth Form has ALWAYS had an excellent reputation and was regularly oversubscribed, only declining when the LBTH intervened recently. It also has a long history of Good Ofsted. The large number of Bursary applications for high quality universities made to the Trust are testimony to the excellence achieved by the Sixth Form. The recent Raine's Basketball Academy was also highly praised by Ofsted. LBTH has disbanded this academy dispersing students all over London, again removing choice for local children.

11. Special Needs Provision

Raine's has always had an excellent Special Needs provision. In addition Raine's has also had an extraordinary number of students with short-term Child Protection orders. The SEN funding budget this year is £119,526 providing for 43 SEN students. It does not need the Oaklands provision.

12. Travel

This Statutory Notice is about closing Raine's. Another consultation exists to increase the PAN of Oaklands. Most Raine's children do NOT wish to go to Oaklands. Children who are currently leaving Raine's are choosing schools such as Bishop Challoner, Morpeth and Mulberry and even some Hackney schools like Haggerston and preferring to travel rather than join Oaklands. By their actions, LBTH have reduced the number of white and black students coming from outside the Borough for a Christian education which will reduce travel. Tower Hamlets schools seem to be in a state of flux and few are safe from closure in light of the sharp proposed increase in PAN reductions in primary and secondary schools. This could quite easily snowball into a steady aversion for Christian education in Tower Hamlets. This will increase travel from LBTH to other Boroughs.

Dated: 30 November 2019

Submitted by Carole Day