

HARINGEY COUNCIL

**EQUALITY IMPACT ASSESMENT FORM
for service delivery**



Service: Prevention & Early Intervention

Directorate: Children & Young People's Service

Title of Proposal: Review of John Loughborough School

Lead Officer (author of the proposal): Jan Doust

Names of other Officers involved: Jennifer Duxbury, Neville Murton, Eveleen Riordan, Carlene Liverpool, Arleen Brown.

Statement of purpose

In making this proposal, we have been mindful of our public sector equality duty to have due regard to the need to:

- eliminate discrimination;
- advance equality of opportunity between different groups and;
- foster good relations between groups in Haringey.

In addition we are committed to ensuring that we promote social inclusion in all council services making sure that they address the needs of those vulnerable residents who rely most heavily on them. The most socially excluded residents predominantly have the protected characteristics defined in the Equality Act 2010.

The purpose of this assessment is to:

- a) Identify whether and to what extent this proposal: could produce disadvantage or enhance opportunity for any groups with the protected characteristic defined in the Equality Act 2010;
- b) Establish whether the potential disadvantage is significant enough to call for special measures to remove or reduce the disadvantage;
- c) Identify and set out the measures that will be taken to remove or reduce the disadvantage;
- d) Where mitigation measures are not possible, to set out and explain why;
- e) To ensure that Members are fully aware of the implications the proposal may have for the Council's public sector equality duty before they decide on the proposal.

Note: This Equalities Impact Assessment follows an initial assessment undertaken in July 2012.. It has been updated following a period of public consultation and addresses the issues arising from consultation.

Step 1 - Identify the aims of the Proposal

STATE:

- a) **WHAT PROBLEMS THE PROPOSAL IS INTENDED TO ADDRESS**
- b) **WHAT EFFECTS IT IS INTENDED TO ACHIEVE**
- c) **WHICH GROUP(S) IT IS INTENDED TO BENEFIT AND HOW**

John Loughborough is a small secondary school with an admission limit of 300 pupils. It is a Voluntary Aided church school owned and operated by the South England Conference of Seventh-day Adventists (SEC) but maintained by the local authority.

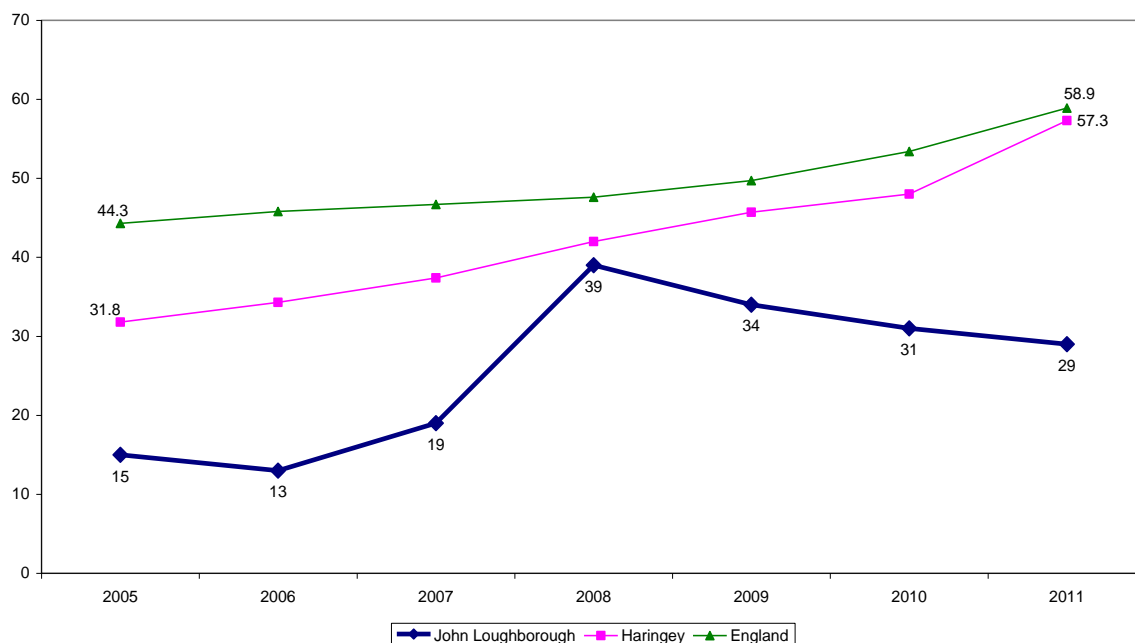
The school was originally established in 1980 in response to the dissatisfaction of Seventh Day Adventist parents of African Caribbean heritage with their children's poor level of attainment in London schools. It was established with the objectives of providing Christian education for Seventh-day Adventists and the wider faith community, and addressing the poor levels of academic attainment prevalent amongst pupils of black ethnicities at that time.

Ofsted and HMI inspections have shown that in recent years it has not been possible for the school to consistently deliver an acceptable standard of education. The school has been in an Ofsted category of concern since February 2007, and the two most recent inspections in October 2009 and December 2011 placed the school in 'special measures' because in the view of inspectors:

'... it is failing to give its students an acceptable standard of education and the persons responsible for leading, managing or governing the school are not demonstrating the capacity to secure the necessary improvement.' (Ofsted 2009 and 2011)

Since 2008, there has been a downward trend in the main indicator of attainment (5 GCSEs at A*-C including English & Maths), and the school is now significantly below the Haringey and England averages.

Trend in 5+ A* - C (including English and maths)



The school is within the scope of the powers of the Secretary of State to either issue an Academy Order, direct the appointment of an Interim Executive Board or direct closure.

Following discussion with the school's Chair of Governors and Education representatives of the SEC, the Director of Children's Services decided that there should be a formal review of the viability of the school. A review team was established comprising representatives from both Haringey Council and SEC. An experienced educational consultant provided external challenge to the review team's analysis and judgements. The scope of the review covered:

- The demand for places at the school by Seventh Day Adventist families and the services that the school provides to these families;
- The quality of education provided by the school, including the reasons for the poor outcomes and the potential for securing rapid and sustained improvement;
- The financial viability of the school in the current circumstances;
- The position of the school within Haringey's overall place planning requirements and the implications of any change in these arrangements for school organisation planning;
- Recommendations on the actions that must be taken with respect to the school in the short, medium and long term.

The review team examined trends in key performance indicators and Ofsted and HMI inspection reports over the previous 5 to 10 years in their analysis of the school's educational and financial viability. The team then considered and evaluated the options available to address the identified underperformance. For details of the analysis undertaken (including summary of relevant data) and of the options considered, please see the full report of the review, at Appendix 1 to the Cabinet report of 18th September 2012.

Following careful consideration of John Loughborough School’s underperformance over many years and the lack of success in attempts to create sustained improvement from a wide range of intervention strategies, the review concluded that the only option which could potentially provide a future for the school would be for it to become a sponsored academy. It was agreed that the SEC would work to secure a sponsor that is confident that they could overcome the challenges identified in the review and support the school to become an academy.

In parallel with this, it was agreed that the Local Authority would put a proposal to consult on closure before the Council’s Cabinet. This will not negate further work to secure a sponsor, as consultation can be terminated if the Church secures an acceptable academy proposal and sponsor that is approved by the Secretary of State. Pursuing both options in parallel will avoid delay in finding the best solution for current and future cohorts of pupils.

Whilst the recommendation of the review is that this dual approach should be followed, this EqlA focuses on the potential closure of the school, as that is the process that is within the power of the Local Authority. The first decision that needs to be taken by Members in this regard is whether to commence consultation on closure.

Statutory Stage	Description	Timescale
1	Consultation on proposed closure	Recommended minimum of six weeks – 1 October- 19 November 2012
2	The publication of a statutory notice setting out the proposal in detail	4 January 2013
3	Representation – an opportunity for stakeholders to express views on the proposals.	7 January to 18 February 2013 (Must be six weeks and cannot be shortened or lengthened to take into account school holidays)
4	Decision – final decision on whether the closure should go ahead, having considered all of the relevant information.	Within two months of the representation period finishing – Spring 2013 (Cabinet 19 March 2013)
5	Implementation – the school closes	As set out in the published statutory notice, subject to any modifications agreed – from September 2013

This EqlA highlights the profile of the pupils at John Loughborough School and considers the potential impact of closure on those with protected characteristics. It will support the LA in promoting equality of opportunity for the affected pupils at John Loughborough. It will be updated in advance of each subsequent decision to be taken by members in order to take account of consultation outcomes and further relevant information arising from the process. This will ensure that equalities considerations inform each decision that is taken.

Any proposal to close John Loughborough School would also affect school staff. Proposed changes to their employment would be the subject of a separate staff and trade union consultation, supported by a specific Staffing EqlA.

Step 2 - Consideration of available data, research and information

You should gather all relevant quantitative and qualitative data that will help you assess whether at present, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The Haringey Borough Profile of Protected Characteristics can be found on the Website) will help you to make comparisons against Haringey's population size. The most up to date information can be found in the [Joint Strategic Needs Assessment](#).

2 a) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:

- *are significantly under/over represented in the use of the service, when compared to their population size?*
- *have raised concerns about access to services or quality of services?*
- *appear to be receiving differential outcomes in comparison to other groups?*

This section compares the population of the John Loughborough School with the wider Haringey secondary school and national populations. It draws from data collected from the Pupil Level Annual School Census's (October 2011 - October 2012), the Department of Education (DfE) and information received from the SEC on numbers of Seventh Day Adventist pupils. It also looks at data on attainment at GCSE and school attendance, and where possible has been broken down by group, for example, ethnicity and gender.

Please note that only the January PLASC counts contain ethnicity data and therefore the table on page 6 has been sourced from the January 2012 PLASC count. Other PLASC counts do not contain ethnicity data and so have no value in terms of understanding the breakdown of ethnic from any school roll. It should also be noted that the Department for Education (DfE) have not yet published attainment data at GCSE by ethnicity for 2012. It is anticipated that this will be made available later on in the year. The DfE have however released attainment data by gender for 2012 which can be viewed on page 8 of this document.

Ethnicity

School population

All of the pupils at John Loughborough School are from a BME background, in that there are no White British pupils. Compared to the overall Haringey secondary school population, there is a higher proportion of pupils of Black ethnicities (particularly Caribbean) and lower proportion of pupils of White, Mixed and Asian ethnicities.

Pupils of Black ethnicities form the majority of the school population (63%), of whom Caribbean pupils form the largest group (38%). The school has a high proportion of Romany or Gypsy pupils – ten times the proportion for Haringey secondary schools overall. There are also significant populations of Eastern European (6.1% of school vs. 2.8% across Haringey secondary schools) and Latin/ Central/ South American pupils (6.8% of school vs 1.1% across Haringey secondary schools).

Over the past few years the ethnicity profile of the school has been shifting. Between 2009 and 2012 the proportion of pupils of black ethnicities fell from 93% to 63% whilst the proportion of Gypsy/Roma, Other White and Other pupils rose from a combined figure of 4% to 28%.

	John Loughborough	%	All Haringey secondary schools	%
White				
British	0	0.0%	2374	19.3%
Irish	2	0.7%	114	0.9%
Traveller of Irish Heritage	0	0.0%	19	0.2%
Romany or Gypsy	20	7.1%	85	0.7%
Any other White Background	31	11.1%	2817	22.9%
Mixed				
White & Black Caribbean	4	1.4%	450	3.7%
White & Black African	3	1.1%	164	1.3%
White & Asian	1	0.4%	124	1.0%
Any other mixed background	9	3.2%	644	5.2%
Asian or Asian British				
Indian	0	0.0%	165	1.3%
Pakistani	0	0.0%	142	1.2%
Bangladeshi	1	0.4%	367	3.0%
Any other Asian background	0	0.0%	138	1.1%
Black or Black British				
Caribbean	106	37.9%	1212	9.9%
African	56	20.0%	1926	15.7%
Any other Black background	14	5.0%	262	2.1%
Chinese	5	1.8%	72	0.6%

	John Loughborough	%	All Haringey secondary schools	%
Any other ethnic group	27	9.6%	995	8.1%
Parent/pupil preferred not to say	0	0.0%	38	0.3%
Ethnicity not known	1	0.4%	192	1.6%
Grand Total	280	100.0%	12300	100.0%

Source: January 2012 PLASC count

Attainment

The table below shows the percentage of pupils attaining the 'basics indicator' (grade C or above in both English and Maths GCSE) in 2011, broken down by ethnicity. Figures for small cohorts of pupils have been excluded for data protection reasons. For all ethnic groups, performance is worse than the national average. The disparity between John Loughborough and national average is much greater for Black African pupils than Black Caribbean.

Overall, the proportion attaining grade C or above in both English and Maths is less than half the national average. Performance in English is much better than in Maths, and for Black Caribbean pupils was higher than the national average.

2011

Ethnicity	No. pupils in cohort 2011	English		Maths		Basics - English and Maths	
		% School	% National	% School	% National	% School	% National
Black Caribbean	35	69	65	40	55	40	49
Black African	18	50	69	28	66	17	58
All Pupils	59	58	68	34	64	29	58

Source: Raiseonline report (Department for Education/Ofsted 2011)

Attendance

The table below shows levels of overall absence and the proportion of persistent absentees, broken down by ethnicity. Overall, absence is close to the national average but the proportion of persistent absentees is significantly above national. The proportion of persistent absentees amongst White- Romany or Gypsy and Black African pupils is particularly high. Please note that whilst attendance data is available for Haringey schools for the academic year 2011-2012, the national figures will not be released until March 2013.

Attendance by ethnicity - 2010-11	% of sessions missed due to overall absence		% persistent absentees - absent for 20% or more sessions	
	School	National - secondary	School	National - secondary
White - Irish	6.93	7.13	0	6
White - Romany or Gypsy	17.56	19.34	12.5	31.1
Any other White Background	8.18	7.06	10	5.1
Mixed - White & Black Caribbean	7.46	7.91	0	7.4
Mixed - White & Black African	4.03	6.31	0	4.4
Mixed - Any other mixed background	7.54	6.63	7.7	4.8
Black - Caribbean	6.90	5.86	7.4	4.1
Black - African	5.47	4.03	9.5	1.5
Black - Any other Black background	4.23	5.44	0	3.6
Chinese	0.75	2.82	0	0.7
Any other ethnic group	6.72	5.87	5.9	3.2
All pupils	6.86	6.55	7.6	4.8

Source: October 2010, January 2011 and May 2011 PLASC Counts

Gender

School population

John Loughborough has a marginally higher proportion of boys attending than girls.
2012

Gender	John Loughborough	%	All Haringey secondary schools	%
Female	130	49.62%	5041	50.53%
Male	132	50.38%	4935	49.47%
Grand Total	262	100.00%	9976	100.00%

Source: October 2012 PLASC Count

Attainment

Attainment is higher amongst girls but is below the national average for both boys and girls. The gap between John Loughborough School and the national average is larger for boys than for girls.

2011

Gender	No. pupils in cohort 2011	English		Maths		Basics - English and Maths	
		% School	% National	% School	% National	% School	% National
Female	30	77	76	47	65	40	61
Male	29	38	61	21	64	17	54
All Pupils	59	58	68	34	64	29	58

Source: Raiseonline report (Department for Education/Ofsted 2011)

2012

Gender	No. pupils in cohort 2012	English		Maths		Basics - English and Maths	
		% School	% National	% School	% National	% School	% National
Female	28	68	76	54	71	54	66
Male	35	34	62	40	70	23	57
All Pupils	63	49	69	46	71	36.5	61

Source: School Checking File – provisional data with recent arrivals removed (Department for Education 2012)

Attendance

Poor school attendance is more prevalent amongst females than males. The proportion of girls who are persistent absentees is double the national average.

Attendance by gender - 2010-11	% of sessions missed due to overall absence		% persistent absentees - absent for 20% or more sessions	
	School	National - secondary	School	National - secondary
Female	7.11	6.71	10.5	5.0
Male	6.64	6.40	5.0	4.6
All pupils	6.86	6.55	7.6	4.8

Source: October 2010, January 2011 and May 2011 PLASC Counts

Age

The school provides education to young people aged 11-16. It does not have a sixth form.

Disability

The Schools Census now includes the facility for schools to submit data on disability, but not all schools are as yet doing so. More complete data is available on Special Education Needs (SEN). Whilst these are not interchangeable terms it should be assumed that children with SEN have a disability for the purposes of the public sector equality duty.

The following table shows that John Loughborough School has a lower proportion of pupils with identified SEN than the Haringey average, for all of the SEN stages of assessment.

	John Loughborough	%	All Haringey secondary schools	%
No identified SEN	228	87.02%	7332	73.50%
School Action ¹	24	9.16%	1788	17.92%
School Action Plus ²	8	3.05%	501	5.02%
Statement of SEN	2	0.76%	355	3.56%
Grand Total	262	100.00%	9976	100.00%

Source: October 2012 PLASC Count

Religion or belief

The following table, provided by the SEC, shows the numbers of Seventh Day Adventist pupils attending John Loughborough School. The most recent data, for 2011, shows that just over a third of pupils are Seventh Day Adventists.

YEAR	SDA population	Non-SDA population (including other Christians)	Total population	% of SDA pupils
2007	101	189	290	35%
2008	81	163	244	33%
2009	100	151	251	40%
2010	95	184	279	34%
2011	94	185	279	34%

Data on religion is not collected as part of the School Census, and national census data does not break down the number of Christians into the various denominations. However, figures from 2005³ state that the number of Seventh Day Adventists in London was 13,000. This represents 0.2% of the population of London at that time.

¹ The SEN Code of Practice refers to the different types of support available for children with SEN. School Action (SA) is used when there is evidence that a child is not making progress at school and there is a need for action to be taken to meet learning difficulties. SA can include the involvement of extra teachers and may also require the use of different learning materials, special equipment or a different teaching strategy.

² School Action Plus (SA+) is used where SA has not resulted in the required progress and is likely to involve seeking external support e.g. speech therapists

³ Source: http://www.bbc.co.uk/religion/religions/christianity/subdivisions/seventhdayadventist_1.shtml

Other protected characteristics

Data was not available for the following equality strands and assessment of impact on these service user groups is not therefore possible:

- Gender Reassignment
- Sexual Orientation
- Maternity & Pregnancy
- Marriage and Civil Partnership

Summary

All of the pupils at John Loughborough School are from BME communities. Relative to Haringey secondary schools overall there are particularly high proportions of Black Caribbean, Romany Gypsy, East European and Latin/Central/South American pupils. The proportion of Romany Gypsy pupils is ten times the Haringey secondary school average. Compared to other Haringey schools, a relatively low proportion of pupils have identified SEN. Over a third of pupils are Seventh Day Adventists.

Attainment at GCSE was worse than the national average in 2011 for all groups of pupils but was particularly low for Black African pupils and for boys. The proportion of persistent absentees is particularly high amongst Black African pupils and amongst girls.

2 b) What factors (barriers) might account for this under/over representation?

The school's founding objectives and religious character explain the high proportion of pupils of black ethnicities and of Seventh Day Adventists. Whilst the proportion of pupils of black ethnicities has been reducing in recent years (from 93% in 2009 to 63% in 2012), it remains high. The school's location in Tottenham, where people of black ethnicities form a larger proportion of the overall population, may be a further factor in this. In the event of the closure of JLS the Council would undertake to make a place available for every pupil currently on roll at JLS in another secondary school. There is currently space available across many of our secondary cohorts to allow for these offers to be made. Where there is not currently sufficient capacity it will be built in through the provision of additional classes across one or more settings so that all displaced pupils can be offered alternative provision within a Haringey school.

The high proportion of Romany Gypsy pupils may relate to the fact that the school has a high level of in-year admissions – as a transient group, Romany and Gypsy pupils may be more likely to be admitted to school outside of the main secondary transfer process. However, whilst in-year admissions for JLS are high relative to the size of the school there are other Haringey secondary schools where numbers of in-year admissions are greater.

The lower than average proportion of pupils with SEN could be explained by parents preferring to send their children to other local schools; alternatively, it could be that the school is not identifying pupils with SEN. The most recent Ofsted inspection (December 2011) rated the “quality of learning for pupils with special educational needs and/or disabilities and their progress” as inadequate.

2c) What other evidence or data will you need to support your conclusions and how do you propose to fill the gap?

It would be helpful to have data on religion however this is not collected as part of the school census.

If a Statutory Notice setting out detailed closure plans is issued following the consultation period, further data may need to be included in future iterations of this EqIA to enable evaluation of impact. Such iterations will include information detailing an application process which will set out how places will be made available to all pupils currently at JLS within the borough, irrespective of whether or not they are currently resident within the borough, although it is recognised not all parents/carers may wish to take up an alternative school place within the borough.

An application process has been designed to ensure parents and carers are able to make informed decisions about where they would prefer their child(ren) to be educated should the school close.

The table below (from the October 2012 PLASC) sets out number of pupils currently living out of borough who attend JLS –

Borough	Year Group					Total
	7	8	9	10	11*	
Barking and Dagenham			1	1		2
Barnet		1	3	1	1	6
Brent	1		1		1	3
Camden					1	1
Ealing					1	1
Enfield	4	5	3	9	9	30
Greenwich			2		1	3
Hackney	3	3	2	4	7	19
Haringey	26	31	37	47	39	180
Hertfordshire		1			1	2
Islington		1			1	2
Lambeth			1			1
Lewisham	1	1		2		4
Merton			1			1
Southwark				1		1
Waltham Forest	1	4		1		6
Grand Total	36	47	51	66	62	262

*Y11 will have finished their KS4 education at the point of closure of JLS in July 2013

Step 3 - Assessment of Impact

Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect any of the existing barriers facing people who have any of the characteristics protected under the Equality Act 2010. State what actions you will take to address any potential negative effects your proposal may have on them.

3 a) How will your proposal affect existing barriers? (Please tick below as appropriate)

Increase barriers? X	Reduce barriers?	No change?
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Comment (Whichever is applicable, explain why)

The proposal to consult on closure flows from the review team’s judgement that all other options open to the Local Authority carry an unacceptably high risk of current and future generations of pupils continuing to receive an unsatisfactory education. Nevertheless, school closure would cause significant disruption to existing pupils and reduce the range of secondary school choices available to prospective pupils.

Undoubtedly, closure would have a negative impact on those Seventh Day Adventist families who prefer their children to be educated in a school that embodies the ethos of their religion, and it is in this respect in particular that barriers would be increased. John Loughborough is the only state Seventh Day Adventist secondary school in the country. Stanborough School in Watford is a Seventh Day Adventist secondary school, however it is a considerable distance away and is fee-paying so would not be a suitable alternative for many parents.

The disruptive effect of closure on pupils attending John Loughborough School would disproportionately fall on pupils from BME groups, as no White British pupils currently attend. Relative to Haringey secondary schools overall there are particularly high proportions of Black Caribbean, Romany Gypsy, East European and Latin/Central/South American pupils, therefore these groups would be particularly affected.

Whilst John Loughborough has a relatively low proportion of pupils with SEN, they nevertheless are a vulnerable group who could be particularly affected by closure of the school (though this could be mitigated by good transition planning). Paragraph 5.76 of the Cabinet report sets this out in more detail. It is acknowledged that this will be a sensitive and delicate process and we will work with the school, parents, carers, educational providers and other professionals to ensure that the process is as smooth as it is possible to be.

Potentially set against these negative impacts is the opportunity for school closure to lead to current and would-be future pupils receiving a better quality of education elsewhere. This potential positive impact is currently being assessed as this the report now recommends a specific proposal (a statutory notice) for closure of the School. (see 3b) below). It will be a central consideration when evaluating possible arrangements for closure and will be looked at in relation to the protected groups. This will be reported

back to Cabinet in the next report and the updated EqIA once the statutory representation period has finished.

3 b) What specific actions are you proposing in order to reduce the existing barriers and imbalances you have identified in Step 2?

Closure of the school would need to be carefully managed in order to minimise the potential negative impact and maximise the potential positive impact for current and future pupils, including in respect to the protected characteristics. The possible arrangements for managing closure fell under three broad approaches:

1. Phased closure – the school closes to new year 7 pupils from September 2013 but remains open for all current pupils to complete their secondary education with John Loughborough
2. Immediate closure and transfer – the school closes in July 2013 and all pupils transfer to other local schools in September 2013
3. Some combination of the two e.g. upon closure pupils in the lower years transfer to other local schools whilst older pupils remain and sit their GCSEs at John Loughborough

The Report for Lead Member sign off recommends that the school is closed with immediate effect on 1 September 2012 and pupils are offered places in other Haringey schools.

Please see the review paper ‘Options for the closure of John Loughborough school’ for further detail on the approaches outlined in 1 – 3 above and the implications for the overall provision of secondary school places in Haringey (available at Appendix 2 to the Cabinet report of 19th September).

At this stage, immediate closure in July 2013 and transfer of pupils is being recommended. If it is agreed that the proposal should proceed to the next stage then we will publish a Statutory Notice setting out a detailed plan for closure of the school that takes into account both the outcomes from the consultation and the further findings of this EqIA. There would then follow a statutory period of representation in which stakeholders can comment on the plan that is put forward. Throughout the process we want to ensure that:

- Affected children have access to education that is good or outstanding
- Parents/carers are able to have their say in what they want for their children
- Any transition does not impact negatively on affected children’s progress

Specific actions to mitigate negative impact and maximise positive impact will be identified as part of putting forward a detailed proposal for closure. Each step has been informed by the findings of the EqIA and its update following consultation:

- Maximising positive impact – securing closure to improve educational attainment for current and future pupils
- Religion – consider suitability of arrangements for different religious groups (including choice of alternative schools available), whether any group would be disadvantaged and how this could be avoided or minimised
- Ethnicity – proposals will need to be cognisant of the predominant ethnic groups amongst JLS pupils and consider suitability of proposed arrangements in light of

this. Any proposal for transfer of pupils will need to consider historical attainment of predominant ethnic groups in receiving schools.

- SEN – proposals will need to take into account the needs of pupils with SEN. The Council's inclusion Service will be involved in further work on options.

Places will be available for all pupils currently attending the John Loughborough School. If we cannot offer a place at any of the schools listed on the application form (because a parent has listed school(s) that are full in the relevant year group) then Haringey residents will be offered a place in the nearest school with an available place. Pupils who are in this position and who live outside Haringey will be sent a list of schools with available places (on the given offer day) so an alternative school can be requested, if the parent so desires. Their applications will also be passed to their home authority who has the statutory responsibility for ensuring that their child has a school place. It is important that within this process we allow parents to state a preference(s) for where their child(ren) is educated once JLS closes. We cannot pre-empt parental preference in carrying out work to provide additional places – preferences will be an important (but not sole) determinant in planning how these additional places are provided and we will work closely with all stakeholders through this process.

3 c) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?

See above

Step 4 - Consult on the proposal

Consultation is an essential part of an impact assessment. If there has been recent consultation which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment.

Make sure you reach all those who are likely to be affected by the proposal. Potentially these will be people who have some or all of the characteristics listed below and mentioned in the Equality Act 2010:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race, Religion or Belief
- Sex (formerly Gender) and
- Sexual Orientation

Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

4 a) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?

The first period of public consultation ran from 1st October to 19th November 2012. Consultation documents (with attached questionnaires) were circulated to:

- The governing body of John Loughborough School
- South England Conference of Seventh Day Adventists
- JLS teachers and other staff
- JLS Parent-Teacher Association
- JLS School council
- JLS pupils and their parents and carers
- Governing bodies, teachers, staff and parents/carers at all Haringey schools
- All neighbouring boroughs
- All boroughs in which current JLS pupils and 2012 year 7 entrants live
- Trade unions representing staff at JLS and other Haringey schools
- All Councillors
- London Diocesan Board for Schools and Diocese of Westminster
- Local residents associations across Haringey
- Local MPs and MPs in neighbouring boroughs

Leaflets were distributed to all local residents and placed in libraries and children's centres. The proposal was publicised in the local press and on the Haringey website. Consultation materials were made available on the Haringey website and one public consultation meeting was held on 7th November 2012.

There were 107 responses to the consultation, and full detail on where the responses were from and what they said is included in the Consultation Report which forms Appendix 5 to this report.

4 b) How, in your proposal have you responded to the issues and concerns from consultation?

There were 8 key themes raised during the consultation.

These are as follows:

1. The School is not providing a good education and therefore the should school close
2. The School should open the school under new management/senior leadership team
3. There is no evidence that the school isn't educationally and financially viable
4. Not happy with the consultation process
5. There are other good schools where the JLS pupils will thrive
6. The School should not close if it improving
7. The Christian ethos of the school is important
8. The small size of a school is positive

Full detail on the source(s) of the responses and more detail on the representation itself is included in Appendix 5 to this report. However, set out at Appendix A to this EqIA are the council's responses to the objections raised as part of the representations received and outlined in 1 – 8 above.

Stakeholders were able to respond to the consultation via a questionnaire (paper or online) and were also invited to write or email the Council with their views. A public meeting for all stakeholders was held at Tottenham Green Leisure Centre on 7 November 2012 and there was also a meeting with the school staff and separately for

pupils. The questions addressed at the public meeting were available to view online (and at the school) a week after the public meeting (and before the consultation period ended).

Every parent/carer at the school was sent a letter setting out the proposals and how they could respond. Every response received was acknowledged and a further response to every individual email was sent.

All of the information contained in the representations (including those made orally at the public meeting) have been considered as part of the decision making process Appendix A to this EqlA contains a summary of the issues raised and the council's response.

4 c) How have you informed the public and the people you consulted about the results of the consultation and what actions you are proposing in order to address the concerns raised?

Informing the public and key stakeholders of the outcome of the consultation

Appendix 5 of this report sets out the results of the consultation. In summary, the results of the consultation were against the closure of the school, although there was a smaller but substantial portion of responses that were in favour of the closure because of the standard of education being delivered at the school.

The objections to the closure of the school are wide and varied and come from all stakeholders. The table below summarises the representations made and who they came from –

Group	What they said ⁴
Pupils	<ul style="list-style-type: none"> - The legacy of JLS will be destroyed - There will be an impact on diversity - The Christian ethos will be lost - We are not being judged fairly on educational attainment because some of the pupils join the school without being able to speak English and need time to learn - The process is too sudden and too rushed - There will be an impact on friendship groups - The impact of adapting to a new school and its environment will be huge - The impact will be on Y10 and Y11 GCSE results - What schools will we go to

⁴ Robust answers to all questions outlined in this table on the future of JLS were provided as part of the public meeting, in response to staff questions and provided online during the consultation period. Answers to questions posed by were fed back during the consultation period.

Group	What they said ⁴
	<ul style="list-style-type: none"> - More money should be given to support the school - The consultation and any closure hugely disrupts learning - The GCSE results to not reflect the more general progression of the school - What will happen to teachers who are displaced? <p>Bu they also said that the closure would bring –</p> <ul style="list-style-type: none"> - Financial stability - EAL students will get more attention - Haringey’s GCSE results will improve if JLS closes - It would give the school the chance to start again - The location of the school could be better
Parents and carers	<ul style="list-style-type: none"> - Does the council recognise the achievement for Afro-Caribbean students at The John Loughborough School? - The John Loughborough School is a Christian school and it is important that we do not undermine faith in the borough and the country. - We have changed the head teacher but need to change the way to make a difference. - It is important to parents to know that their children are in a safe environment, safe from gun and knife crime. The school is a family, the staff know our children and have our children’s best interest at heart. - The decision has already been taken - The review panel do not have enough

Group	What they said ⁴
	<p>knowledge of the school and you need to look at its history</p> <ul style="list-style-type: none"> - Enough time has not been allocated for the consultation -
Staff	<ul style="list-style-type: none"> - Firm decisions are now needed by the Council so that Staff can plan for their future - What is the staff' options if the school closes and what are the standard options available? - 74% of pupils make at least 3 levels of progress - Councillors don't go into schools so what are they basing their decisions on? - Leafleting local homes to tell them about the closure is underhand - If small schools are a challenge then small faith schools will not be able to exist - What has the council done to support the school through an academy status? - Why were staff not consulted before today? - You have already made up your mind to close the school
Governing body (via a letter written by the Chair of Governors	<p>The governing body opposes the closure of the school. It has been an excellent school in the past and pressure of rising students with EAL has caused the exam results and attainment to dip. However, harmony within the school across all stakeholders is very rarely reflected to such a degree in other schools and is very empowering for pupils as they leave the school and become citizens. Where the negatives outweigh the positives this trend needs to be reversed. The school encourages every child to achieve and the number of black afro Caribbean children obtaining 5 or more A* - C GCSEs compares favourably with other schools.</p>
Founding members of JLS	<p>The consultation documents are incomplete as they do not produce data for African Caribbean pupils in the borough and show</p>

Group	What they said ⁴
	pupils regardless of ethnicity (this is not the case). For 22 years the Council has had a negative attitude to JLS and are responsible for the low exam results and the dismissal of a previous HT. With the right support the school could again be a beacon.

The paragraphs below summarise the themes and issues that came out as part of the consultation and the council's response to the points that have been raised by stakeholders. These comments supplement response sets out in Appendix A to this EqIA -

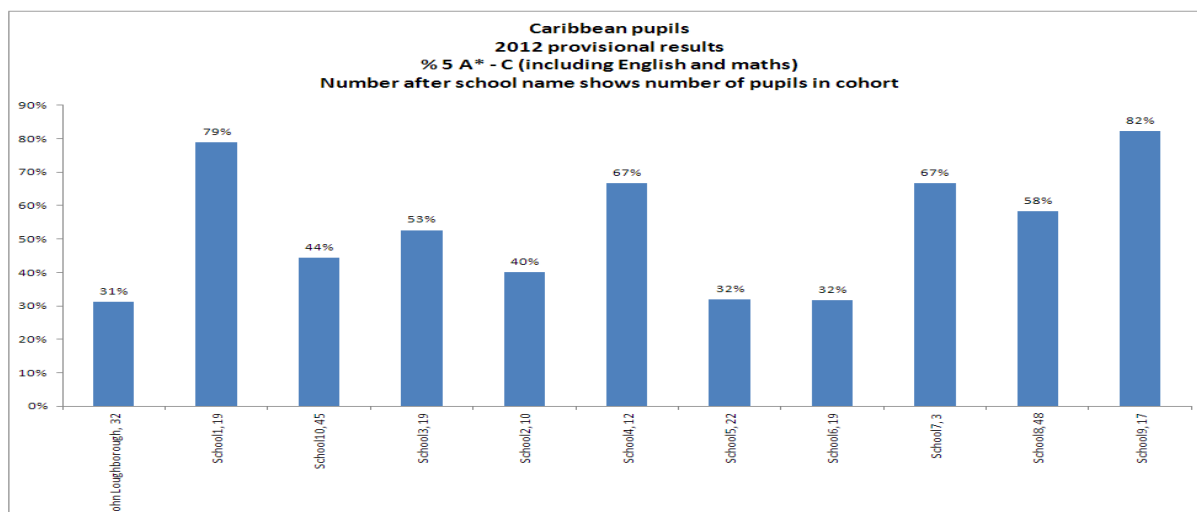
1. Does the council recognise the achievement for Afro-Caribbean students at The John Loughborough School? When looking at the attainment of pupils at John Loughborough School the council needs to compare attainment of other Black African and Black Caribbean pupils rather than all children.

The table below shows the percentage of pupils attaining 5 or more A*-C GCSE passes (including English and Maths) of pupils at John Loughborough school and the attainment of African and Caribbean pupils in Haringey. From 2002 to 2004 a higher percentage of pupils at John Loughborough attained 5 or more A*-C GCSE passes (including English & Maths) than African and Caribbean pupils in Haringey as a whole. From 2005 onwards (with the exception of 2008) a greater percentage of African and Caribbean pupils in Haringey as a whole attained 5 or more A*-C GCSE passes (including English & Maths), than pupils at John Loughborough.

The exam data shows that African and Caribbean students do not do better at The John Loughborough School than the overall for African and Caribbean students in Haringey schools.

Year	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012 Provisional
John Loughborough	19%	36%	24%	15%	13%	19%	39%	34%	31%	29%	35%
Afro-Caribbean pupils Haringey	15.3%	23.5%	18.5%	21.1%	23%	24%	30%	34%	31%	42%	50%

The graph below shows the provisional results for African and Caribbean students in all Haringey schools in 2012. It shows that the percentage of African and Caribbean students attaining 5 or more A* - C (including English and Maths) passes in The John Loughborough school is the lowest of all Haringey schools.



- If you look at levels of progress 70% of students make at least 3 levels of progress and are meeting and surpassing national standards of progress. There is a need to look at the value added the school provides for its students

Analysis of Contextual Value Added (2008-2010) and Value Added 2011 of Haringey schools for African and Caribbean pupils at the end of GCSE years 2008 – 2011.

The data is taken from the DFE/Ofsted Raiseonline reports and the DFE school and college performance tables website. Prior to 2011 the analysis was based on contextual value added. In 2011 the DFE changed the way the calculations were done and removed the contextual aspect, so that it now only involves the prior attainment of pupils and does not include contextual aspects. (VA data for 2012 is not currently available)

The higher the CVA or VA score is, the more progress pupils have made. So a score of 1014 is better than a score of 1003 etc.

The information on schools overall value added scores is freely available on the DFE website – this is why the school names have been left on.

	2008 CVA	2009 CVA	2010 CVA	2011 VA
John Loughborough	994	995	1000	958.6
Alexandra Park	1027	1034	1014	1015.2
Fortismere	1017	1013	1006	1006.4
Greig City Academy	1024	1023	1008	996.2
Gladesmore	1037	1047	1044	1027.5
Highgate Wood	1002	978	987	999.0
Hornsey School for Girls	1009	1007	984	997.9
Northumberland Park	1033	1028	1028	1009.8
Park View	1033	1017	1010	1013
St Thomas More	1002	1002	980	1009.1
Woodside High	998	1014	1026	1029.2

The value added data for all pupils at The John Loughborough School show they do not make more progress than students at other schools.

The following information is broken down by ethnic background to make comparisons of the progress made by Afro-Caribbean students at John Loughborough School and other Haringey secondary schools.

The rank numbers show the position of the school's value added relative to the other Haringey schools. A rank of 1 is the highest in terms of the value added for pupils in the school. A rank of 11 is the lowest.

John Loughborough African pupils. The rank of the school compared to the other secondary schools in Haringey was 11th (bottom) in 2008, 8th in 2009, 5th in 2010 and 11th in 2011.

John Loughborough Caribbean pupils. The rank of the school compared to the other secondary schools in Haringey was 8th in 2008, 10th in 2009, 7th in 2010 and 11th in 2011.

The value added data shows that Afro-Caribbean students at The John Loughborough School do not make more progress than Afro-Caribbean students at other schools.

School	Eth	2008 CVA	2009 CVA	2010 CVA	2011 VA	Haringey Rank 2008 (out of 11)	Haringey Rank 2009 (out of 11)	Haringey Rank 2010 (out of 11)	Haringey Rank 2011 (out of 11)
John Loughborough	African	983	1010.9	1006.7	958.9	11	8	5	11
Sch1	African	1014.8	1024.4	1035.3	1035.8	4	2	1	2
Sch2	African	1020.3	1025.6	1019.8	1020.9	3	1	2	5
Sch3	African	1032.1	1012.2	1006.7	1033.3	1	6	5	3
Sch4	African	999.5	996	979.1	1016.4	9	10	11	6
Sch5	African	987	1017.1	1010.3	1025.8	10	5	3	4
Sch6	African	1010.8	1019.8	1005.7	1039.1	6	3	7	1
Sch7	African	1014.6	1011.8	1005.2	1008.5	5	7	8	8
Sch8	African	1025	1018	1007	1016.1	2	4	4	7
Sch9	African	1003	1001	993	996.9	8	9	9	10
Sch10	African	1006	991	987	1001.8	7	11	10	9

School	Eth	2008 CVA	2009 CVA	2010 CVA	2011 VA	Haringey Rank 2008 (out of 11)	Haringey Rank 2009 (out of 11)	Haringey Rank 2010 (out of 11)	Haringey Rank 2011 (out of 11)
John Loughborough	African	983	1010.9	1006.7	958.9	11	8	5	11
Sch1	African	1014.8	1024.4	1035.3	1035.8	4	2	1	2
Sch2	African	1020.3	1025.6	1019.8	1020.9	3	1	2	5
Sch3	African	1032.1	1012.2	1006.7	1033.3	1	6	5	3
Sch4	African	999.5	996	979.1	1016.4	9	10	11	6
Sch5	African	987	1017.1	1010.3	1025.8	10	5	3	4
Sch6	African	1010.8	1019.8	1005.7	1039.1	6	3	7	1

Sch7	African	1014.6	1011.8	1005.2	1008.5	5	7	8	8
Sch8	African	1025	1018	1007	1016.1	2	4	4	7
Sch9	African	1003	1001	993	996.9	8	9	9	10
Sch10	African	1006	991	987	1001.8	7	11	10	9

3. Why were national measures not put in place to support the school in English and maths?

The National Strategies, a programme of training and resources, available to schools from the late 1990s until 2011, covering particularly the core subjects, was indeed made available to all schools in Haringey, including John Loughborough. For the duration of the programme, a balance was maintained nationally and locally, trying to assist individual schools to adapt the materials and training to their specific needs, without the losing rigour of the national programme.

4. Given that the council has had concerns about the school for some time why was a super-head not put into the school in 2008?

John Loughborough is a Voluntary Aided school. This means the Governing Body, rather than the local authority, has responsibility for the recruitment and employment of all staff including the Headteacher.

5. Have you already made your minds up to close the school?

This is a genuine consultation, but we have an issue to resolve which has been highlighted by inspection reports and young people's attainment. There are three possible solutions- school closure, an academy sponsor or a home grown solution. Any home grown solution will have to be a radical departure from what has gone or been tried before.

6. Why are you doing this now?

We are considering closure now because that is where we are now in terms of changing the outcomes for pupils, prior interventions have not seen sustained and continued improvement to the school's exam results, and we need to act now to stop further deterioration. The Ofsted inspection regime works on a national timescale and there are expectations on schools and local authorities when schools are placed into categories, which are highlighted in the consultation document.

Following the 2007 Ofsted inspection, which placed the school in special measures, the local authority put in an Interim Executive Board (IEB). Despite extensive resources to support the school and the best endeavours of the IEB to establish rapid change, including the appointment of a new head teacher and revised governing body, the Ofsted reports in 2009 and 2011 showed that improvements were not embedded and that fundamental weaknesses remained.

The council could not allow this situation of poor standards at the school to continue any longer. A review in May 2012 of all the possible intervention options open to the

council and the South of England Conference to improve standards at the school concluded that the best way forward was a twin track approach where the local authority would consult on the closure of the school while the governing body would pursue the academy route and seek a sponsor. Should the DfE agree the academy sponsor and for John Loughborough to convert to an academy, the local authority would withdraw the proposal to close the school.

7.The act of closing the school is a discriminatory act

This first round of consultation on the possible closure of The John Loughborough School has been undertaken following a review of the school's viability which was carried out jointly by Haringey Council's Children and Young people's Service and the South of England Conference of the Seventh Day Adventists. An Independent experienced educational consultant also sat on the review panel. The objectives of the review were to establish whether or not the school was educationally and financially viable. The review looked at, among other things, Ofsted reports, Raiseonline data, attendance, performance of minority groups, parental preferences for school admissions, and annual budget turnouts. The review team unanimously concluded that the school as currently organised has not been educationally viable because the quality of education that it provides has been consistently inadequate. It was also concluded that, since 2008, the school's budget has fallen into deficit which cannot be recovered from educational funding sources alone. The review did not use any discriminatory measures to come to these conclusions. No other secondary school within the borough currently has such poor educational outcomes for its pupils or has such a consistently poor budgetary outlook, without outside funding sources taken into consideration.

8.What will happen in the future, this process disrupts the education of the pupils currently at the school. Where will the pupils go if the school does close?

The review concluded that the education provided for the pupils at John Loughborough School was consistently inadequate. The purpose of the review was to inform future decisions which could ensure that education of pupils would not be consistently inadequate. The Cabinet report that was considered by members prior to this consultation set out three possible options for how any closure of John Loughborough School might be implemented if the decision is to close the school. All of these options place the children and young people's educational wellbeing at the centre of any decision-making. The aim of any future decisions is to improve educational outcomes for all of the young people currently at the school as well as future pupils. We have been in open discussions with the governing body and school staff around what support can be offered to students at the school to assist them through this difficult time. Inevitably there is a period of uncertainty when consultation on any possible closure of the school is taking place, but the timeframe for the consultation and the options being considered all seek to minimise this uncertainty and improve outcomes for all these pupils as we move forward.

9. When will there be a consultation meeting with parents?

The public meeting held at Tottenham Green Leisure Centre was intended for parents and carers of existing and potential future pupils of the school, school staff, governors and everyone else that has an interest in the future of the school. The school undertook that they would arrange a further meeting for current parents/carers of pupils at the school, with officers from Haringey Council attending if the school asked for it. By the time of the closing of the consultation no further request for a meeting had come from the school.

10. There were five other schools in the council in a category at the time, how much was spent on the other schools in comparison? How much money has been spent on other schools, where the pupils weren't doing so well 4 years ago – now look at how those schools are doing – why can't you provide the same assistance to JLS

John Loughborough School is currently the only secondary school in a category of concern within the Ofsted framework. The school has been in a category since 2007. Our data shows that in the last five years, only one other secondary school has been in a category of concern and that has since been judged outstanding (2011). There is a well-documented schedule of intensive support that has been given to John Loughborough School to attempt to bring it to good or outstanding. This has included support for teaching and learning, behaviour and leadership & management to improve standards of attainment and progress for all pupil groups, particularly in maths. Support has been provided by the local authority, London Challenge, Education London and other Haringey schools, including head teachers of schools judged to be outstanding.

11. Why John Loughborough School was not allocated additional pupils who did not get their preferred place schools?

Wherever possible all families are given one of their preferred schools. For many families this means their first preference, while for some families it may be one of their lower preferences (each family can express up to six preferences for their child). Where schools are oversubscribed pupils are allocated according to the admissions criteria for the school. Where pupils do not receive any of their preferences they are allocated the next school where there are spaces and where the child best meets the admission's criteria for that school.

September 2012 offers by preferences for John Loughborough Schools

Preferred School	No. of offers by preference/allocation							Grand Total
	FIRST	SECOND	THIRD	FOURTH	FIFTH	SIXTH	ALLOCATION	
The John Loughborough School	12	3			1			16

The John Loughborough has not received enough applications over recent years to fill the 60 available places. With the agreement of the governing body, these places can be offered to other pupils in the borough who have not been offered a place elsewhere. If

the governors agree to take allocations, unplaced pupils are offered to the nearest school with an available place.

12. The picture the council portrays that the school is not financially viable is not true.

The review panel concluded that the school is not currently financially viable. Further, the new funding formula severely restricts the factors we can use to fund schools. In particular it sweeps away most of the site and school specific factors that gave a degree of stability to smaller schools. Factors that have gone include universal grants and teacher threshold grants. Although a degree of protection for smaller schools has been achieved by providing a significant lump sum, a much greater proportion of funding is now through the pupil led funding that directs money to larger schools. This will place further pressure on John Loughborough School to remain financially viable.

Following receipt and analysis of the consultation responses, the recommendation in the report which this EqlA informs is for the Lead Member to agree that the Council should issue a statutory notice proposing the closure of the school. Full details of why this recommendation is being made is included in the main report. In summary, the recommendation is made because:

- The education being delivered at the school has not been good enough over a long period. This is reflected by the school being in an Ofsted category of concern since February 2007. The most recent Ofsted inspection in December 2011 placed the school in 'special measures' for the second time because in the view of the inspectors: '...it is failing to give its students an acceptable standard of education and the persons responsible for leading, managing or governing the school are not demonstrating the capacity to secure the necessary improvement.'
- The one counter proposal, put forward by SchoolsCompany Ltd, to allow the school to become an academy has been rejected by the DfE who have now acknowledged that, despite extensive work, they too had been unable to identify a sponsor who they believed had the required capacity, track record and experience to make John Loughborough a success working in partnership with SEC.
- Despite targeted support over the last ten years, no sustained or significant improvements have been made to the standard of education within the school;
- The GCSE results continue to be significantly below borough and national averages and the government's floor standards.

The school and its Governing Body have been unsuccessful to date in finding an academy sponsor for the school.

The report will be available on the Council's website and hard copies will be available at the school. Stakeholders were informed that this is how the results would be made available.

Actions to address concerns raised

Responses to representations have been outlined in detail in the above paragraphs. Where action is required as a result of the representations, for example the allocation of

alternative school places, the above paragraphs have set out how that will be managed in the coming months given the information on pupils currently at the school.

Step 5 - Addressing Training

The equalities issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

Do you envisage the need to train staff or raise awareness of the equalities issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?

There are likely to be training issues arising if the school were to close, in order to ensure that staff are able to meet the needs of the affected young people. Consideration of this will form part of the detailed planning, and more information will be included in future iterations of this EqIA.

There may also be training issues to ensure staff members can move forward from any closure of the school and continue within their profession. Any needs will need to be identified in close work with staff members.

Step 6 - Monitoring Arrangements

If the proposal is adopted, there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the protected characteristics detailed in Step 4 above. The purpose of equalities monitoring is to see how the proposal is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address those effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and report quarterly, in the first instance to your DMT and then to the Corporate Equalities Board.

What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?

As with training, monitoring arrangements will be considered as part of the detailed planning, and more information will be included in future iterations of this EqIA.

- *Who will be responsible for monitoring?*

The local authority is responsible for monitoring standards and attainment at all of its maintained schools. If John Loughborough School were to close, the local authority would take the lead in managing the process and monitoring its implementation.

- *What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?*

A wealth of data is available relating to pupil progress and attainment will be used to track outcomes for affected cohorts of pupils.

- *Are there monitoring procedures already in place which will generate this information?*

Yes, all of this information is produced as a matter of routine.

- *Where will this information be reported and how often?*

More information to be included in future versions of this EqIA.

Step 7 - Summarise impacts identified

In the table below, summarise for each diversity strand the impacts you have identified in your assessment

Age	Disability	Race	Sex	Religion or Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Impact will be on pupils aged 11-16	School has low numbers of pupils with SEN (currently no pupils in Y7 – Y10 with a Statement of Special Educational Need) however as a vulnerable group their needs will need to be taken into account in the preparation of any statutory	School has high proportion of black pupils, particularly Caribbean, also Gypsy Romany, Latin American and E. European. Attainment particularly low amongst African pupils. Impact of closure will be mixed – disruption of closure vs. potential for improved outcomes at alternative school(s); will need careful consideration in the allocation of any alternative school places for this group.	Gender split is fairly even. Boys' attainment very low at John Loughborough so more potential for them to benefit from better education at alternative schools.	Clear negative impact on Seventh Day Adventist community – closure of the only state-funded SDA secondary school in the country. Important to consider the suitability of alternative arrangements proposed for SDA pupils, including informing parents/carers of the places available in	No impact identified	No impact identified	No impact identified	No impact identified

	notice for closure to ensure that their needs are met in any allocation of an alternative school place.			other faith schools (including out of borough) and informing how their faith and spiritual development can continue to be met.				
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Step 8 - Summarise the actions to be implemented

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

NOTE: These actions are subject to Lead member deciding to issue a statutory notice on closure. Actions will be added/refined in future iterations.

Issue	Action required	Lead person	Timescale	Resource implications
Decision needed on whether to proceed to statutory notice stage	Report to Lead Member	Jan Doust	December 2012	Officer time



Step 9 - Publication and sign off

There is a legal duty to publish the results of impact assessments. The reason is not simply to comply with the law but also to make the whole process and its outcome transparent and have a wider community ownership. You should summarise the results of the assessment and intended actions and publish them. You should consider in what formats you will publish in order to ensure that you reach all sections of the community.

When and where do you intend to publish the results of your assessment, and in what formats?

The assessment will be published on the Haringey website and paper or electronic copies made available for anyone who requests one.

Assessed by (Author of the proposal):

Name: Jan Doust

Designation: Deputy Director, Prevention & Early Intervention

Signature:

Date:

Quality checked by (Policy, Equalities and Partnerships Team):

Name: Arleen Brown

Designation: Senior Policy Officer

Signature: *A.j.Brown*

Date: 4 December 2012 and XXXX (steps 1 – 3)

(steps 1-3 only - to be reviewed following consultation)

Sign off by Directorate Management Team:

Name:

Designation:

Signature:



Haringey Council

Date:

Ref: I\PI\PEP\EQUALITIES\equalities impact assessment for service delivery template (update November 2011)



Appendix A – Representations and Council responses

Representation - The School should open under new management and a new senior leadership team

Response : A number of consultant school leaders and specialist advisers have attempted to turn the school's performance around in the last ten years without significant and sustained improvement. The SEC has also provided extensive support both financial and advisory, without a sustained impact on outcomes for children at the school. The recent appointment by the SEC of a new Headteacher has led to very early signs of improvement but such indicators have been evident in earlier attempts and this approach is not considered a sustainable solution in the long term. Since 2008, there has been a downward trend in the main indicator of attainment (5 GCSEs at A*-C including English & Maths), and the school is now significantly below the Haringey and England averages.

At the recent public meeting (held as part of the consultation on the 7 November 2012) it was asked if the school could be given a further period of five years to embed the small improvements that have been seen under the current leadership of the school. Standards have been of concern for a period of ten years and, despite interventions, improvement has not been significant or sustained. The five year improvement time-frame suggested equates to an entire generation of pupils. No evidence has been received to demonstrate how the school's performance could be dramatically improved and sustained within this timeframe. Small improvements have previously been demonstrated but these have not been able to be sustained and built upon.

Representation - There is no evidence that the school is not educationally viable across all groups but also with specific reference to Afro-Caribbean students at the school (and with particular reference to Afro-Caribbean students at other Haringey schools and nationally)

Response: Since 2008, there has been a downward trend in the main indicator of attainment (5 GCSEs at A*-C including English & Maths), at the school across all groups and the school is now significantly below the Haringey and England averages. The table below shows the percentage of pupils attaining 5 or more A*-C GCSE passes (including English and Maths) of pupils at John Loughborough school and the attainment of African and Caribbean pupils in Haringey.

From 2002 to 2004 a higher percentage of pupils at John Loughborough attained 5 or more A*-C GCSE passes (including English & Maths) than African and Caribbean pupils in Haringey as a whole. From 2005 onwards (with the exception of 2008) a greater percentage of African and Caribbean pupils in Haringey as a whole attained 5 or more A*-C GCSE passes (including English & Maths), than pupils at John Loughborough.

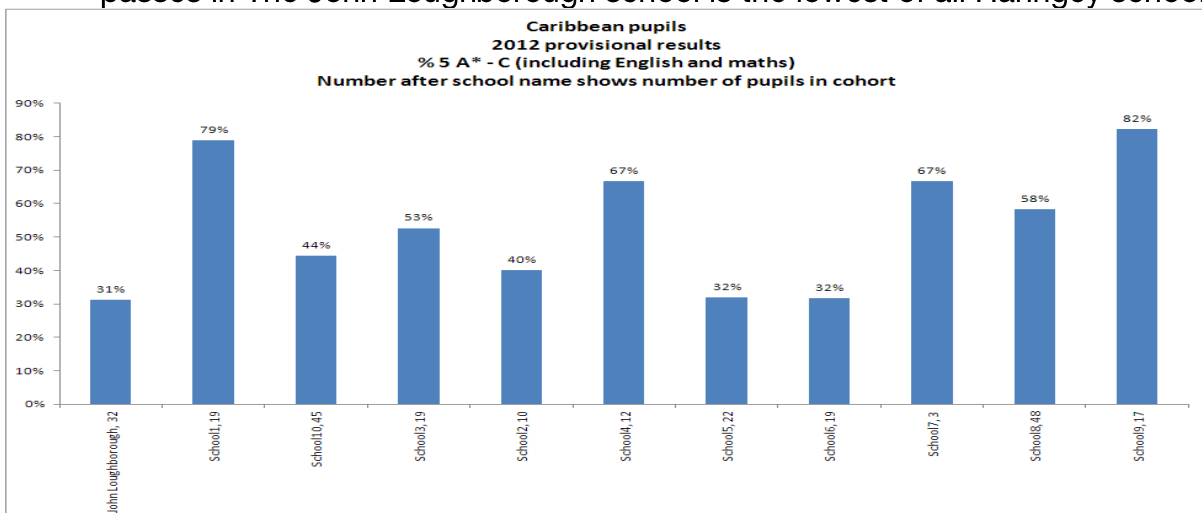


The exam data shows that African and Caribbean students do not do better at The John Loughborough School than the overall for African and Caribbean students in Haringey schools.

Percentage of 5 or more A*-C GCSE passes including English and Maths

Year	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012 Provisional
John Loughborough	19%	36%	24%	15%	13%	19%	39%	34%	31%	29%	35%
Afro-Caribbean pupils Haringey	15.3%	23.5%	18.5%	21.1%	23%	24%	30%	34%	31%	42%	50%

The graph below shows the provisional results for African and Caribbean students in all Haringey schools in 2012. It shows that the percentage of African and Caribbean students attaining 5 or more A* - C (including English and Maths) passes in The John Loughborough school is the lowest of all Haringey schools.



If you look at levels of progress 70% of students make at least 3 levels of progress and are meeting and surpassing national standards of progress. There is a need to look at the value added the school provides for its students

Below is an analysis of Contextual Value Added (2008-2010) and Value Added 2011 of Haringey schools for African and Caribbean pupils at the end of GCSE years 2008 – 2011. Value added is a prediction based on prior attainment (in SATs (standard assessment tests) at the end of primary school (key stage 2 or KS2)

The value added scores are shown as a measure based on 100. Scores above 100 represent schools where pupils on average made more progress than similar pupils



Haringey Council

nationally, while scores below 100 represent schools where pupils made less progress.

Contextual Value Added (CVA) is a statistic used to assess the performance of schools. The statistic is intended to show the progress children have made whilst attending a particular school. Unlike statistics such as exam performance, contextual value added attempts to take into account the circumstances of children attending the school that are beyond the school's control.

The statistic works by comparing a child's performance with that of children with a similar prior performance and similar circumstances. There are three levels – 1, 2 and 3 but it is Level 2 CVA measures performance of secondary schools and is based around a median score of 1000. CVA takes into account nine factors that are known to affect the performance of children, but outside of the schools control. The factors are gender, Special educational needs (SEN), eligibility for free school meals, first language, whether pupils move between schools (mobility), ethnicity, the age (i.e. the month they were born) of different pupils within the year group, whether a pupil has been taken into care at any stage, and the level of deprivation in the area that the pupil lives.

The data is taken from the DFE/Ofsted Raiseonline⁵ reports and the DFE school and college performance tables website. Prior to 2011 the analysis was based on contextual value added. In 2011 the DFE changed the way the calculations were done and removed the contextual aspect, so that it now only involves the prior attainment of pupils and does not include contextual aspects. (VA data for 2012 is not currently available)

The higher the CVA or VA score is, the more progress pupils have made. So a score of 1014 is better than a score of 1003 etc.

The information on schools overall value added scores is freely available on the DFE website.

⁵ Raiseonline is a secure web-based system that provides schools, local authorities and inspectors with a range of analyses including: Attainment at the end of Key Stages 1 and 2, progress from Key Stage 1 to 2, absence and exclusions; and the characteristics (often referred to as 'context') of pupils. For each type of analysis, a school is compared to national averages for secondary schools.



	2008 CVA	2009 CVA	2010 CVA	2011 VA
John Loughborough	994	995	1000	958.6
Alexandra Park	1027	1034	1014	1015.2
Fortismere	1017	1013	1006	1006.4
Greig City Academy	1024	1023	1008	996.2
Gladesmore	1037	1047	1044	1027.5
Highgate Wood	1002	978	987	999.0
Hornsey School for Girls	1009	1007	984	997.9
Northumberland Park	1033	1028	1028	1009.8
Park View	1033	1017	1010	1013
St Thomas More	1002	1002	980	1009.1
Woodside High	998	1014	1026	1029.2

The value added data for all pupils at The John Loughborough school show they do not make more progress than students at other schools.

The following information is broken down by ethnic background to make comparisons of the progress made by Afro-Caribbean students at John Loughborough School and other Haringey secondary schools.

The rank numbers show the position of the school's value added relative to the other Haringey schools. A rank of 1 is the highest in terms of the value added for pupils in the school. A rank of 11 is the lowest.

John Loughborough African pupils. The rank of the school compared to the other secondary schools in Haringey was 11th (bottom) in 2008, 8th in 2009, 5th in 2010 and 11th in 2011.

John Loughborough Caribbean pupils. The rank of the school compared to the other secondary schools in Haringey was 8th in 2008, 10th in 2009, 7th in 2010 and 11th in 2011.

The value added data shows that Afro-Caribbean students at The John Loughborough School **do not** make more progress than Afro-Caribbean students at other schools.



CVA and VA for African pupils

School	Eth	2008 CVA	2009 CVA	2010 CVA	2011 VA	Haringey Rank 2008 (out of 11)	Haringey Rank 2009 (out of 11)	Haringey Rank 2010 (out of 11)	Haringey Rank 2011 (out of 11)
John Loughborough	African	983	1010.9	1006.7	958.9	11	8	5	11
Sch1	African	1014.8	1024.4	1035.3	1035.8	4	2	1	2
Sch2	African	1020.3	1025.6	1019.8	1020.9	3	1	2	5
Sch3	African	1032.1	1012.2	1006.7	1033.3	1	6	5	3
Sch4	African	999.5	996	979.1	1016.4	9	10	11	6
Sch5	African	987	1017.1	1010.3	1025.8	10	5	3	4
Sch6	African	1010.8	1019.8	1005.7	1039.1	6	3	7	1
Sch7	African	1014.6	1011.8	1005.2	1008.5	5	7	8	8
Sch8	African	1025	1018	1007	1016.1	2	4	4	7
Sch9	African	1003	1001	993	996.9	8	9	9	10
Sch10	African	1006	991	987	1001.8	7	11	10	9

CVA and VA for Caribbean pupils

School	Eth	2008 CVA	2009 CVA	2010 CVA	2011 VA	Haringey Rank 2008 (out of 11)	Haringey Rank 2009 (out of 11)	Haringey Rank 2010 (out of 11)	Haringey Rank 2011 (out of 11)
John Loughborough	Caribbean	1000	988	998.7	963.4	8	10	7	11
Sch1	Caribbean	1026.9	1037.5	1032.4	1030.8	1	1	1	2
Sch2	Caribbean	1024.1	1026	1029.7	963.9	2	3	2	10
Sch3	Caribbean	1016.8	1009.1	1004.7	1002.6	4	6	6	3
Sch4	Caribbean	1009.7	1006.8	979	992.9	6	7	9	6
Sch5	Caribbean	991.6	1012.2	1017.4	1051.8	10	5	3	1
Sch6	Caribbean	1021.3	1031	1017.3	1000.8	3	2	4	4
Sch7	Caribbean	996.4	1003.5	975.3	993.3	9	8	10	5
Sch8	Caribbean	1011	1014	1005	978.7	5	4	5	8
Sch9	Caribbean	986	969	969	966.5	11	11	11	9
Sch10	Caribbean	1005	999	986	987	7	9	8	7

Representation - There is no evidence that the school is not financially viable

Response: The Head of Finance for Children and Young People's Service contributed to the review by assessing the school's financial viability, concluding that the school provides poor value for money because it delivers an inadequate education for children. From the Council's perspective the school is not financially viable because, in the current funding methodology, it requires extensive and sustained financial subsidy and resource support from the SEC, without which the school would be faced with a significant budget deficit.

It is also clear that the changes to Education Funding being proposed from April 2013 will provide further financial challenges to small schools generally and



therefore John Loughborough School specifically. In particular it removes most of the site and school specific factors that gave a degree of stability to smaller schools. Factors that have gone include universal grants and teacher threshold grants. Although a degree of protection for smaller schools has been achieved by providing a significant lump sum, a much greater proportion of funding is now through the pupil led funding that directs money to larger schools. This will place further pressure on John Loughborough School to remain financially viable.

The Section 251⁶ budget return shows that the school is currently more highly funded than the average secondary school in Haringey with a cost of £7577 per pupil. The average cost of funding per pupil across all secondary schools in the borough is £6901 although it must be noted that this average amount is artificially boosted by funding to Heartlands which is temporarily higher as this is a growing school that is growing incrementally (currently only years 7 – 9 are on roll). In summary, currently JLS has the highest funding per pupil and the lowest education outcome per pupil in terms of GCSEs.

Representation – there is dissatisfaction with the consultation process, including that it is too rushed

Response: The DfE Guidance, Closing a Maintained Mainstream school, sets out how any proposed closure should be approached. The guidance says that the proposer must allow “adequate time” for the consultation (para 1.2). Para 1.6 advises that the proposers should allow at least 6 weeks for this consultation. Careful consideration was given to the length of time that stakeholders should have to respond to the consultation. We wanted to ensure that all stakeholders had adequate time to make their views known. In this instance a period of 7 weeks was provided to allow sufficient time for meaningful engagement, while balancing the need for the consultation to be carried out in a timely manner and with all due regard to any specified statutory timeframes to ensure that that certainty with regard to the school’s future is established in the most expedient manner.

The council recognises the uncertainty and anxiety that comes when any consultation starts. Comments were also received relating to the release date of information on possible closure. Early information on the consultation and possible closure of the school could not be released to wider stakeholders until the outcomes of the review and its recommendations were firmly established as it would have introduced uncertainty to these stakeholders on the future of the school before any evidenced recommendations on the school’s future could be made.

A representation was made on why we are consultation at this point in time. We are considering closure now because that is where we are now, prior interventions have not seen sustained and continued improvement to the school’s exam results, we need to act now to stop further deterioration. The Ofsted inspection regime works on a national timescale and there are expectations on schools and local

⁶ Section 251 of the Apprenticeships, Skills, Children and Learning Act 2009



authorities when schools are placed into categories, which are highlighted in the consultation document.

Following the 2007 Ofsted inspection, which placed the school in special measures, the local authority put in a Interim Executive Board (IEB). Despite extensive resources to support the school and the best endeavours of the IEB to establish rapid change, including the appointment of a new head teacher and revised governing body, the Ofsted reports in 2009 and 2011 showed that improvements were not embedded and that fundamental weaknesses remained.

The council could not allow this situation of poor standards at the school to continue any longer. A review in May 2012 of all the possible intervention options open to the council and the South of England Conference to improve standards at the school concluded that the best way forward was a twin track approach where the local authority would consult on the closure of the school while the governing body would pursue the academy route and seek a sponsor. Should the DfE agree the academy sponsor and for John Loughborough to convert to an academy, the local authority would withdraw the proposal to close the school.

Representation - The School is on an upward trend in performance terms and should not close if it improving

Response: a response to the request for an extension of time to see if the school can maintain any measured improvement has been covered in the representation above which proposed a new senior leadership for the school.

Representation - The Christian ethos of the school is important to its pupils and its loss will impact upon diversity of secondary provision within the borough

Response: The Council recognises that The John Loughborough School is the only non fee-paying Adventist secondary school in England, and the Council are recommending closing the school based on the consideration of a number of material issues including the educational outcomes for the pupils at the school. The SEC has been fully engaged in discussion with the council about the options for the future of The John Loughborough School. We understand that The John Loughborough School was established to meet the needs of Seventh Day Adventist (SDA) parents, although approximately only one third of pupils are now from Seventh Day Adventist families. The school is selected by very few parents as a preference of secondary school for their children at age 11 – for 2012 entry only 11 parents specified it as a first preference for their child. A number of parents do choose the school in later years when in-year admissions help to fill vacant school places. Pupils joining the school through this route usually continue for the duration of their secondary education.

In recommending closure of the school, the LA has weighed up all material considerations. The educational outcomes of pupils at the school has been at an unacceptably low level for a sustained period now, despite interventions to reverse this trend. If the school were to close, we would seek to ensure that pupils'



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spiritual needs would continue to be met through home life, church and Sunday school attendance.

Representation - The small size of a school is a positive aspect of JLS

Response: The LA acknowledges and recognises the unique aspect of JLS's size when compared with other Haringey schools and the very special environment that this can create for pupils and staff. However, the benefits identified as a result of the small size of the school cannot override the unacceptable educational outcomes for its pupils.

Representation - Closure will interfere with pupils' exam preparation and more generally with all pupils' learning

Response: If the decision to close the school is taken, full regard will be had to the optimum transition arrangements for all pupils to minimise any disruption to learning. It is acknowledged that this will be a sensitive and delicate process and we will work with the school, parents, carers, educational providers and other professionals to ensure that the process is as smooth as it is possible to be. The aim of any future decisions is to improve educational outcomes for all of the young people currently at the school as well as future pupils. We have been in open discussions with the governing body and school staff around what support can be offered to students at the school to assist them through this difficult time. Inevitably there is a period of uncertainty when consultation on any possible closure of the school is taking place, but the timeframe for the consultation and the options being considered all seek to minimise this uncertainty and improve outcomes for all these pupils as we move forward. This report recommended that the school is closed across all year groups from July 2013 and current pupils at the school (with the exception of the current Y11 who will have finished key stage 4 of their education in July 2013) moved to other school(s). Where the pupils will move to will be determined as part of the admission process following the approval of any statutory notice to close the school.

Representation - The future for staff needs to be set out

Response: Staff and unions will continue to form part of the consultation process on the future of the school. The unions have been informed of this consultation and will continue to be consulted at every stage of the process. In the event of school closure, a separate Equalities Impact Assessment will be carried out.

Representation - The decision to close the school has already been taken

Response: This is a genuine consultation, but the LA has an issue to resolve which has been highlighted by inspection reports and by young people's attainment. Two possible solutions emerged from the review into the school - school closure or an academy sponsor. To date no approved academy sponsor has been secured and no alternative solution has been established, despite interventions.