

King Fahad Academy

Bromyard Avenue, Acton, London W3 7HD

Inspection dates 11 October 2018

Overall outcome

The school does not meet all of the independent school standards that were checked during this inspection

Main inspection findings

Part 1. Quality of education provided

Paragraph 2(1), 2(1)(a), 2(1)(b), 2(1)(b)(i), 2(1)(b)(ii), 2(2), 2(2)(a), 2(2)(b), 2(2)(c), 2(2)(d), 2(2)(d)(i), 2(2)(d)(ii), 2(2)(e), 2(2)(e)(ii), 2(2)(e)(iii), 2(2)(e)(iii), 2(2)(f), 2(2)(g), 2(2)(h) and 2(2)(i)

- The Department for Education commissioned the inspection to evaluate this part because it had concerns about the quality of education at the school.
- The school's International Baccalaureate programmes cover all the areas of learning required by the independent school standards. Curriculum plans are in place and teachers follow them.
- In all year groups, many pupils arrive from abroad and a high proportion of these are at the very early stages of learning English as an additional language. Leaders assess pupils' language knowledge on entry and provide effective teaching and additional support for these pupils.
- The programme of activities for students in the sixth form is appropriate to their needs. Sixth form students feel well supported. In 2018, the average points score for pupils in the International Baccalaureate diploma improved significantly to above the international average.
- Children in the early years continue to make strong progress across all areas of learning.
- The requirements of this paragraph are met.

Paragraph 3, 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j) and 4

- At the time of the full standard inspection, teaching, learning and assessment were not of a consistently high quality to enable pupils to make strong progress. Pupils were not consistently challenged, particularly in the International Baccalaureate middle years programme. Also, leaders did not analyse the progress of current pupils in a systematic and detailed way.
- The action plan stated that the curriculum and teaching and learning policies and their



- impact would be reviewed. Senior and middle leaders planned to scrutinise pupils' work, observe classes and feedback to staff on a regular basis. Leaders planned to introduce a new system for monitoring pupils' progress. These plans have been implemented.
- Staff are well qualified in their specialist subject areas. They say that they are well supported in developing their teaching skills through professional development and feedback from leaders. Pupils are attentive and focused in classes because teachers plan activities effectively. Teachers adapt work for pupils, for example through their questioning and the different tasks that they set, so that the needs of different groups of pupils are met. The standards relating to pupils' progress are now met. However, there is still a little inconsistency in teachers' expectations in mathematics and in the opportunities that pupils are given to write at length.
- The school's policy of segregation limits pupils' opportunities to learn and socialise together. Given this detriment, the policy constitutes direct discrimination contrary to the Equality Act 2010.
- The requirements of paragraph 3(j), and hence of paragraph 3, are unmet.
- The school does not meet all the requirements for this part.

Part 3. Welfare, health and safety of pupils

Paragraph 7, 7(a) and 7(b)

- The Department for Education commissioned the inspection to evaluate this part because it had concerns about the welfare of pupils at the school.
- The school's safeguarding policy meets requirements and is published on the school's website. Leaders are trained and knowledgeable about the recent changes in the statutory guidance and the impact that this has on their work with pupils. Leaders maintain effective partnerships with the local authority.
- Leaders identify the potential risks to pupils from their use of mobile phones and hold workshops for parents to support pupils to stay safe.
- The school has a high number of new arrivals and leavers. Leaders are acutely aware of the particular risks to new arrivals coming from very different cultures abroad to the United Kingdom. They take steps to ensure that pupils are well supported.
- Pupils are clear that they feel safe in school. They know who the safeguarding leads are and are confident that they can go to any adult for help.
- The requirements of this paragraph are met.

Paragraph 9, 9(a), 9(b) and 9(c)

- At the full standard inspection, the behaviour of pupils, particularly boys, sometimes fell below the standards expected of them. The behaviour policy was not implemented consistently.
- The action plan stated that leaders would set up a behaviour committee, review the policy and provide training for staff.
- Leaders have strengthened the behaviour management system. Pupils understand the



system and say that it is fair. The school's behaviour data shows that the number of incidents and serious incidents of boys' misbehaviour has dropped significantly from 2017 to 2018. In the first five weeks of the current academic year, behaviour incidents have continued to decrease. During the inspection, boys behaved well in classes and around the school. Pupils and staff confirm that this is typical.

■ The requirements of this paragraph are met.

Paragraph 10

- The school's anti-bullying policy meets requirements. Overall, pupils were clear that bullying was rare. This is confirmed by the school's records of bullying. Pupils are confident that if they have any concerns adults will help them.
- The requirements of this paragraph are met.

Paragraph 13

- The school's first aid policy is implemented effectively. Pupils know the procedures for getting help if they are unwell or injured. They find the medical room and staff to be welcoming and have confidence in the system.
- The requirements of this paragraph are met.

Paragraph 16, 16(a) and 16(b)

- The school's risk assessment and health and safety policy meet requirements. Risk assessments are in place and the premises are well maintained.
- The requirements of this paragraph are met.
- The school meets all the requirements for this part.

Part 4. Suitability of staff, supply staff, and proprietors

Paragraph 18(2), 18(2)(a), 18(2)(b), 18(2)(c), 18(2)(c)(i), 18(2)(c)(ii), 18(2)(c)(iii), 18(2)(c)(iv), 18(2)(d), , 18(2)(e), 18(3), 19(2), 19(2)(a), 19(2)(a)(i), 19(2)(a)(i)(aa), 19(2)(a)(i)(bb), 19(2)(a)(i)(cc), 19(2)(a)(i)(dd), 19(2)(a)(ii), 19(2)(b), 19(2)(c), 19(2)(d), 19(2)(d)(ii), 19(2)(d)(ii), 19(3), 20(6), 20(6)(a), 20(6)(a)(i), (6)(a)(ii), 20(6)(b), 20(6)(b)(ii), 20(6)(b)(iii), 20(6)(b)(iii), 20(6)(c), 21(1), 21(2), 21(3), 21(3)(a), 21(3)(a)(i), 21(3)(a)(ii), 21(3)(a)(ii), 21(3)(a)(ii), 21(3)(a)(ii), 21(3)(a)(ii), 21(3)(a)(ii), 21(5)(a), 21(5)(a), 21(7), 21(7)(a) and 21(7)(b)

- Leaders have ensured that all the appropriate checks are completed for leaders, staff, agency workers, governors and trustees. Leaders are knowledgeable about safer recruitment practice. They ensure that the recruitment and checking process is robust and keep themselves up to date with any changes in statutory guidance. The checks are recorded on the single central record.
- The requirements of these paragraphs are met.
- The school meets all the requirements for this part.

Part 7. Manner in which complaints are handled



Paragraph 33 and 33(f)

- At the full standard inspection, leaders did not comply with the school's own procedure for managing complaints. They did not respond to complaints within the stated timeframe and did they did not keep a central record of all complaints.
- The action plan stated that trustees and senior staff would amend the complaints policy and procedures, and regularly review their effectiveness.
- The complaints policy and procedures now meet requirements. Complaints are kept centrally. Leaders complete a cover sheet to track the response to complaints, including informal complaints in writing.
- The requirements of this paragraph are met.
- The school meets all the requirements for this part.

Part 8. Quality of leadership in and management of schools

Paragraph 34(1), 34(1)(a), 34(1)(b) and 34(1)(c)

- Leaders have not ensured that all the independent school standards are met, because of the segregation in the upper school. However, leaders have taken effective action to address the standards that were unmet at the previous inspection. These are now met.
- The segregation of pupils in the upper school means that the school is in breach of the law. School leaders and trustees have taken advice and conducted a review of the segregation arrangements. They have identified for themselves that the segregation is in breach of the Equality Act 2010 and have discussed the options available to the school to ensure compliance.
- Leaders have acted promptly to address the weaknesses identified at the previous inspection. Leaders are starting to work in a more strategic manner. For example, staff with a range of responsibilities have been grouped together to form a pupil welfare team. This is having a positive impact on how effectively leaders work in partnership with each other for the benefit of pupils.
- Leaders' record-keeping is detailed. However, the formats of these records do not always facilitate analysis of patterns and trends.
- The requirements of this paragraph remain unmet.
- The school does not meet all the requirements for this part.



Compliance with regulatory requirements

The school does not meet the requirements of the schedule to The Education (Independent School Standards) Regulations 2014 ('the independent school standards') and associated requirements that were checked during this inspection, as set out in the annex of this report. This included the standards and requirements that the school was judged to not comply with at the previous inspection. Not all of the standards and associated requirements were checked during this inspection.



School details

Unique reference number	101957
DfE registration number	307/6068
Inspection number	10039846

This inspection was carried out under section 109(1) and (2) of the Education and Skills Act 2008, the purpose of which is to advise the Secretary of State for Education about the school's suitability for continued registration as an independent school.

Type of school	Other independent school
School status	Independent school
Age range of pupils	3 to 18
Gender of pupils	Mixed
Gender of pupils in the sixth form	Mixed
Number of pupils on the school roll	482
Of which, number on roll in sixth form	20
Number of part-time pupils	0
Proprietor	King Fahad Academy Limited
Chair	HRH Prince Mohammed bin Nawaf bin Abdul Aziz
Headteacher	Dr Abdulghani Alharbi
Annual fees (day pupils)	£2,500 to £4,500
Telephone number	020 8743 0131
Website	www.thekfa.org.uk
Email address	academy@thekfa.org.uk
Date of previous standard inspection	17–19 January 2017

Information about this school

■ King Fahad Academy is an independent day school for boys and girls in East Acton. The school has an Islamic ethos and was established in 1985.



- The school is registered for up to 620 pupils between the ages of 3 to 18. There are currently 482 pupils on roll. A significant proportion of pupils join and leave the school during the school year because their parents or carers are nationals of Saudi Arabia and come to the United Kingdom for work or are relocated elsewhere.
- The school follows the International Baccalaureate (IB) curriculum for all pupils and students. It operates the IB diploma programme for students aged 16 to 18 years, the IB middle years programme for pupils of secondary school age, and the IB primary years programme for pupils of primary school age.
- The school operates a policy of segregation by sex in the upper school. Pupils between the ages of 11 and 16 are segregated for almost all classes and at breaktimes. Some activities are in mixed sex groups. For example, pupils study an IB inter-disciplinary unit, attend assemblies and after-school clubs and classes in mixed sex groups. This year the school's student leadership council is also a mixed group. The trustees plan to consult with parents on a way forward. They intend to be compliant with the law by September 2019. The policy causes the following detriment to pupils: pupils have limited opportunities to study and socialise with pupils of the opposite sex. Given this detriment, the policy constitutes direct discrimination contrary to the Equality Act 2010.
- The previous full standard inspection took place in January 2017, when the overall judgement was requires improvement.
- Since the previous inspection, there have been several changes in leadership. A new director (headteacher) has been appointed and has been in post since September 2017. A director of education was appointed in April 2018 to lead the school's improvement work. There have been other changes to roles and responsibilities within the senior leadership team.
- The school does not use any alternative provision.



Information about this inspection

- This inspection was carried out at the request of the registration authority for independent schools. The purpose of the inspection was to monitor the progress the school has made in meeting the independent school standards and other requirements that it was judged to not comply with at its previous inspection.
- The school's last full standard inspection was in January 2017, when its overall effectiveness was judged as requires improvement and some of independent school standards were unmet. The Department for Education required the school to prepare an action plan. The action plan was evaluated in June 2017. The action plan met requirements and was accepted.
- This was the first monitoring inspection since the full standard inspection in January 2017. The inspection took place without notice.
- The inspector met with the headteacher, the director of education, the school business manager and the designated safeguarding lead. The inspector also met with a group of classroom-based staff and held a telephone conversation with a trustee representing the proprietor.
- The inspector visited classes in the upper school, the primary school and the early years. These were joint visits with senior staff. The inspector also visited an assembly.
- The inspector spoke to pupils across the age range in classes and at breaktime and lunchtime. The inspector held a discussion with two groups of pupils to find out about their views of the school.
- The inspector held a telephone conversation with the local authority designated officer for safeguarding.
- A wide range of documents was scrutinised, including the school policies, curriculum plans, leaders' monitoring folders and documents relating to safeguarding, progress, behaviour and welfare of pupils.

Inspection team

Janet Hallett, lead inspector	Her Majesty's Inspector



Annex. Compliance with regulatory requirements

The school does not meet the following independent school standards

Standards that were not met at the previous inspection and remain un-met at this inspection

Part 8. Quality of leadership in and management of schools

- 34(1) The standard about the quality of leadership and management is met if the proprietor ensures that persons with leadership and management responsibilities at the school—
 - 34(1)(a) demonstrate good skills and knowledge appropriate to their role so that the independent school standards are met consistently;
 - 34(1)(b) fulfil their responsibilities effectively so that the independent school standards are met consistently; and
 - 34(1)(c) actively promote the well-being of pupils.

Standards that were met at the previous inspection, but are now judged to not be met at this inspection

Part 1. Quality of education provided

- 3 The standard is met if the proprietor ensures that the teaching at the school-
- 3(j) does not discriminate against pupils contrary to Part 6 of the 2010 Act[10].

The school now meets the following requirements of the independent school standards

- The proprietor ensures that a written policy on the curriculum, supported by appropriate plans and schemes of work, which provides for the matters specified in sub-paragraph (2) is drawn up and implemented effectively; and the written policy, plans and schemes of work take into account the ages, aptitudes and needs of all pupils, including those pupils with an EHC plan; and do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs (2(1), 2(1)(a), 2(1)(b), 2(1)(b)(i), and 2(1)(b)(ii)).
- For the purposes of paragraph (2)(1)(a), the matters are—full-time supervised education for pupils of compulsory school age (construed in accordance with section 8 of the Education Act 1996), which gives pupils experience in linguistic, mathematical, scientific, technological, human and social, physical and aesthetic and creative education; that pupils acquire speaking, listening, literacy and numeracy skills; where the principal language of instruction is a language other than English, lessons in written and spoken



English, except that this matter does not apply in respect of a school which provides education for pupils who are all temporarily resident in England and which follows the curriculum of another country; personal, social, health and economic education which reflects the school's aim and ethos; and encourages respect for other people, paying particular regard to the protected characteristics set out in the 2010 Act¹ (2(2), 2(2)(a), 2(2)(b), 2(2)(c), 2(2)(d), 2(2)(d)(ii) and 2(2)(d)(ii)).

- For pupils receiving secondary education, access to accurate, up-to-date careers guidance that is presented in an impartial manner; enables them to make informed choices about a broad range of career options; and helps to encourage them to fulfil their potential (2(2)(e), 2(2)(e)(i), 2(2)(e)(ii) and 2(2)(e)(iii)).
- Where the school has pupils below compulsory school age, a programme of activities which is appropriate to their educational needs in relation to personal, social, emotional and physical development and communication and language skills; where the school has pupils above compulsory school age, a programme of activities which is appropriate to their needs; that all pupils have the opportunity to learn and make progress; and effective preparation of pupils for the opportunities, responsibilities and experiences of life in British society (2(2)(f), 2(2)(g), 2(2)(h) and 2(2)(i)).
- The standard in this paragraph is met if the proprietor ensures that the teaching at the school enables pupils to acquire new knowledge and make good progress according to their ability so that they increase their understanding and develop their skills in the subjects taught; that the teaching at the school fosters in pupils self-motivation, the application of intellectual, physical and creative effort, interest in their work and the ability to think and learn for themselves; involves well planned lessons and effective teaching methods, activities and management of class time; shows a good understanding of the aptitudes, needs and prior attainments of the pupils, and ensures that these are taken into account in the planning of lessons; demonstrates good knowledge and understanding of the subject matter being taught; utilises effectively classroom resources of a good quality, quantity and range; demonstrates that a framework is in place to assess pupils' work regularly and thoroughly and use information from that assessment to plan teaching so that pupils can progress; utilises effective strategies for managing behaviour and encouraging pupils to act responsibly; does not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs (3, 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), and 3(i)).
- The standard in this paragraph is met where the proprietor ensures that a framework for pupil performance to be evaluated, by reference to the school's own aims as provided to parents or national norms, or to both, is in place (4).
- The standard in this paragraph is met if the proprietor ensures that arrangements are made to safeguard and promote the welfare of pupils at the school; and such arrangements have regard to any guidance issued by the Secretary of State. The standard about the provision of information by the school is met if the proprietor ensures



that particulars of the arrangements for meeting the standard contained in paragraph 7 are published on the school's internet website or, where no such website exists, are provided to parents on request; (7, 7(a), 7(b), 32(1)) and 32(1)(c).

- The standard in this paragraph is met if the proprietor promotes good behaviour among pupils by ensuring that a written behaviour policy is drawn up that, among other matters, sets out the sanctions to be adopted in the event of pupil misbehaviour; the policy is implemented effectively; and a record is kept of the sanctions imposed on pupils for serious misbehaviour (9, 9(a), 9(b) and 9(c)).
- The standard in this paragraph is met if the proprietor ensures that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy (10).
- The standard in this paragraph is met if the proprietor ensures that first aid is administered in a timely and competent manner by the drawing up and effective implementation of a written first aid policy (13).
- The standard in this paragraph is met if the proprietor ensures that the welfare of pupils at the school is safeguarded and promoted by the drawing up and effective implementation of a written risk assessment policy; and appropriate action is taken to reduce risks that are identified (16, 16(a) and 16(b)).
- The standard in this paragraph is met if such person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that person is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 to that Act; no such person carries out work, or intends to carry out work, at the school in contravention of a prohibition order, an interim prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act, or any disqualification, prohibition or restriction which takes effect as if contained in either such direction. The proprietor carries out appropriate checks to confirm in respect of each such person, the person's identity; the person's medical fitness; the person's right to work in the United Kingdom; and where appropriate, the person's qualifications; the proprietor ensures that, where relevant to any such person, an enhanced criminal record check is made in respect of that person and an enhanced criminal record certificate is obtained before or as soon as practicable after that person's appointment; in the case of any person for whom, by reason of that person living or having lived outside the United Kingdom, obtaining such a certificate is not sufficient to establish the person's suitability to work in a school, such further checks are made as the proprietor considers appropriate, having regard to any guidance issued by the Secretary of State; and the checks referred to in sub-paragraphs (2)(c) and (except where sub-paragraph (4) applies) (2)(e) must be completed before a person's appointment (18(1), 18(2), 18(2)(a), 18(2)(b), 18(2)(c), 18(2)(c)(i), 18(2)(c)(ii), 18(2)(c)(iii), 18(2)(c)(iv), 18(2)(d), 18(2)(e) and 18(3)).
- A person offered for supply by an employment business to the school only begins to work at the school if the proprietor has received written notification from the employment business in relation to that person that the checks referred to in paragraph 21(3)(a)(i) to (iv), (vii) and (b) have been made to the extent relevant to that person; that, where relevant to that person, an enhanced criminal record check has been made and that it or



another employment business has obtained an enhanced criminal record certificate in response to such a check; and if the employment business has obtained such a certificate before the person is due to begin work at the school, whether it disclosed any matter or information; that, where that person is one for whom, by reason of that person living or having lived outside the United Kingdom, obtaining such a certificate is not sufficient to establish the person's suitability to work in a school, it or another employment business has obtained such further checks as appropriate, having regard to any guidance issued by the Secretary of State; and a copy of any enhanced criminal record certificate obtained by an employment business before the person is due to begin work at the school; a person offered for supply by an employment business only begins work at the school if the proprietor considers that the person is suitable for the work for which the person is supplied; before a person offered for supply by an employment business begins work at the school the person's identity is checked by the proprietor of the school (irrespective of any such check carried out by the employment business before the person was offered for supply); the proprietor, in the contract or other arrangements which the proprietor makes with any employment business, requires the employment business to provide—the notification referred to in paragraph (a)(i); and a copy of any enhanced criminal record certificate which the employment business obtains, Except in the case of a person to whom sub-paragraph (4) applies, the certificate referred to in sub-paragraph (2)(a)(i)(bb) must have been obtained not more than 3 months before the date on which the person is due to begin work at the school (19(1), 19(2), 19(2)(a), 19(2)(a)(i), 19(2)(a)(i), a), 19(2)(a)(i)(bb), 19(2)(a)(i)(cc), 19(2)(a)(i)(dd), 19(2)(a)(ii), 19(2)(b), 19(2)(c), 19(2)(d), 19(2)(d)(i), 19(2)(d)(ii) and 19(3).

- An individual not being the Chair of the school, who is a member of a body of persons corporate or unincorporate named as the proprietor of the school in the register or in an application to enter the school in the register, if MB does not carry out work, or intend to carry out work, at the school in contravention of a prohibition order, an interim prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act or any disqualification, prohibition or restriction which takes effect as if contained in either such direction. Subject to sub-paragraphs (7) to (8), the Chair of the school makes the following checks relating to MB, where relevant to the individual, an enhanced criminal record check; checks confirming MB's identity and MB's right to work in the United Kingdom; and where, by reason of MB's living or having lived outside the United Kingdom, obtaining an enhanced criminal record certificate is not sufficient to establish MB's suitability to work in a school, such further checks as the Chair of the school considers appropriate, having regard to any guidance issued by the Secretary of State and subject to sub-paragraph (8), where the Secretary of State makes a request for an enhanced criminal record check relating to MB countersigned by the Secretary of State to be made, such a check is made. (20(6), 20(6)(a), 20(6)(a)(ii), 20(6)(b), 20(6)(b)(i), 20(6)(b)(ii), 20(6)(b)(iii) and 20(6)(c)).
- The proprietor keeps a register which shows such of the information referred to in subparagraphs (3) to (7) as is applicable to the school in question. The register referred to in sub-paragraph (1) may be kept in electronic form, provided that the information so recorded is capable of being reproduced in legible form (21(1) and 21(2)).



- The information referred to in this sub-paragraph is, in relation to each member of staff ("S") appointed on or after 1st May 2007, whether S's identity was checked; a check was made to establish whether S is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act; a check was made to establish whether S is subject to any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act or any disqualification, prohibition or restriction which takes effect as if contained in such a direction; checks were made to ensure, where appropriate, that S had the relevant qualifications; an enhanced criminal record certificate was obtained in respect of S; checks were made pursuant to paragraph 18(2)(d); a check of S's right to work in the United Kingdom was made; and checks were made pursuant to paragraph 18(2)(e), including the date on which each such check was completed or the certificate obtained; in relation to each member of staff ("S"), whether a check was made to establish whether S is subject to a prohibition order or an interim prohibition order, including the date on which such check was completed (21(3), 21(3)(a), 21(3)(a)(i), 21(3)(a)(ii), 21(3)(a)(iii), 21(3)(a)(iv), 21(3)(a)(i), 21(3)(a)(v), 21(3)(a)(vi), 21(3)(a)(vii), 21(3)(a)(viii) and 21(3)(b)).
- The information referred to in this sub-paragraph is, in relation to each member of staff in post on 1st August 2007 who was appointed at any time before 1st May 2007, whether each check referred to in sub-paragraph (3) was made and whether an enhanced criminal record certificate was obtained, together with the date on which any check was completed or certificate obtained (21(4)).
- The information referred to in this sub-paragraph is, in relation each member ("MB") of a body of persons named as the proprietor appointed on or after 1st May 2007, whether the checks referred to in paragraph 20(6)(b) were made, the date they were made and the date on which the resulting certificate was obtained (21(6)).
- The information referred to in this sub-paragraph is, in relation to each member of a body of persons named as the proprietor in post on 1st August 2007 who was appointed at any time before 1st May 2007— whether each check referred to in sub-paragraph (6) was made; and whether an enhanced criminal record certificate was obtained, together with the date on which any check was completed or certificate obtained (21(7), 21(7)(a) and 21(7)(b)).
- The proprietor ensures that a complaints procedure is drawn up and effectively implemented which deals with the handling of complaints from parents of pupils and which, where the parent is not satisfied with the response to the complaint made in accordance with sub-paragraph (e), makes provision for a hearing before a panel appointed by or on behalf of the proprietor and consisting of at least three people who were not directly involved in the matters detailed in the complaint (33 and 33(f)).



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