

Norbury Court School

Inspection dates

18 December 2019

Overall outcome

The school is unlikely to meet all the independent school standards when it opens

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)(i), 2(2)(e)(ii), 2(2)(e)(iii), 2(2)(g), 2(2)(h) and 2(2)(i)

- Leaders intend that the school's curriculum will be similar to the national curriculum. They have ensured that an appropriate curriculum policy is in place. Schemes of work will enable teachers to plan what they will teach and when. Leaders aim to ensure that pupils will gain experience of a sufficiently broad range of subjects. For key stage 5 students, this may include additional vocational experiences.
- Leaders intend to provide full-time education for all pupils. Leaders intend that any key stage 5 students will follow courses to help them improve their GCSE grade or other qualifications achieved at the end of Year 11. They do not intend to offer A-level courses.
- Leaders have ensured that schemes of work promote British values. They intend that pupils will be well prepared for life in British society by developing their understanding of equality of opportunity.
- Leaders recognise that teachers will need to adapt the curriculum to meet the needs of pupils with special educational needs and/or disabilities (SEND).
- Leaders intend that teachers will provide impartial careers guidance that builds on pupils' interests.
- Leaders have planned for the promotion of pupils' personal, social, health and economic education to be threaded throughout the curriculum.

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

- The proprietor has appointed a headteacher and someone to the role of the education link. The latter will work with the headteacher in the school but in addition will aim to ensure smooth transition to and from the school/home each day.
- Leaders have identified some of the resources that staff will need to support teaching. However, some of these have not yet been ordered. Leaders will not be able to install

the basic resources needed by the school such as furniture and computers until the conversion of the school building is complete.

- Leaders intend that pupils' knowledge, skills and needs will be assessed when pupils join the school. They will use this information to plan the detail of pupils' learning and to check that pupils are making progress. Leaders will use teachers' continual assessment of pupils' learning to ensure that pupils' knowledge and skills grow over time.
- Leaders intend that pupils will complete nationally recognised external qualifications at the end of Year 11.
- Leaders intend to provide parents and carers with information about pupils' progress each term. They will issue parents with an annual report.
- The proprietor has not ensured that the standard relating to resources in this part is likely to be met. The other standards in this part are likely to be met.

Part 2. Spiritual, moral, social and cultural development of pupils

Paragraph 5, 5(a), 5(b), 5(b)(i), 5(b)(ii), 5(b)(iii), 5(b)(iv), 5(b)(v), 5(b)(vi), 5(b)(vii), 5(c), 5(d), 5(d)(i), 5(d)(ii) and 5(d)(iii)

- Leaders have planned a curriculum to develop pupils' personal, social, health and economic education. In tandem with this are plans to develop pupils' spiritual, moral, social and cultural awareness. In addition, leaders also intend that pupils will have opportunities to broaden their education through visits to local colleges and places of work.
- Within the curriculum, leaders intend that teachers will develop pupils' understanding of making appropriate choices. Teachers will develop pupils' understanding of the importance of being law-abiding citizens.
- The curriculum is intended to teach pupils about respecting the views of others. It also focuses on being mindful of the different cultures and traditions within British society. This will include that pupils are tolerant and respectful of each other, whatever their characteristics or background.
- The school's child protection policy sets out leaders' clear expectation that staff will ensure that there is no political bias in their work.
- The proprietor has ensured that the standards in this part are likely to be met.

Part 3. Welfare, health and safety of pupils

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

- There is no single central record to prove that the staff who will work with pupils in the school are suitable.
- The safeguarding policy identifies that all staff will have the necessary training so that they are vigilant in identifying and reporting any concerns that they may have about a pupil. The headteacher will act as the key person in following up any safeguarding concerns. The member of staff who is the education link between the school and the

home will support the headteacher in following up any safeguarding concerns. Should there be any concerns about the headteacher, a referral will be made to the proprietor.

Paragraph 9, 9(a), 9(b), 9(c) and 10

- The school's policies about managing behaviour and bullying set out how staff will encourage positive behaviour through the use of rewards and sanctions.
- Leaders intend that all staff will be trained in how to de-escalate any potentially serious poor behaviour. They will also be trained in delivering effective responses to poor behaviour, should they need to physically intervene.
- Leaders intend that there will be a systematic approach to recording and monitoring any instances of serious poor behaviour or bullying.

Paragraph 11, 12, 13, 14 and 16

- The school's policies for health and safety have been drawn up. When the building work is complete, leaders intend to commission a full fire-risk assessment to be completed by an independent professional.
- The school risk assessment policies are in the process of being completed. The detailed planning that leaders intend to complete concerning each pupil will form part of the school's risk assessment for an individual.
- Leaders intend that the class in school will have a maximum of four pupils. Leaders intend high staff to pupil ratios. This will mean that staff will be able to support pupils' learning through close supervision.

Paragraph 15

- There is no admissions policy in place.
- Leaders intend to have registers in place to monitor pupils' attendance.
- The proprietor has not ensured that the standards in this part are likely to be met.

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

Paragraph 17, 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), 18(3), 19(1), 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)(i), 19(2)(d)(ii), 19(2)(e), 19(3), 21(1), 21(2), 21(3), 21(3)(a), 21(3)(a)(i), 21(3)(a)(ii), 21(3)(a)(iii), 21(3)(a)(iv), 21(3)(a)(v), 21(3)(a)(vi), 21(3)(a)(vii), 21(3)(a)(viii) and 21(3)(b)

- The school's system for appointing staff includes the required suitability to work with pupils. However, there is no electronic record in place to summarise the results of the checks already made.
- The standards relating to the suitability of staff, supply staff and proprietors are unlikely to be met.

Part 5. Premises of and accommodation at schools

Paragraph 23(1), 23(1)(a), 23(1)(b), 23(1)(c), 24(1), 24(1)(a), 24(1)(b), 25, 26, 27, 27(a), 27(b), 28(1), 28(1)(a), 28(1)(b), 28(1)(c), 28(1)(d), 28(2), 28(2)(a), 28(2)(b), 29(1), 29(1)(a) and 29(1)(b)

- Work has only recently started on the conversion of a garage to become the school building. It is not due to be completed until January 2020. Considerable work remains before the building will be ready for use as a school.
- The building plan indicates that features such as a toilet facility for the boys have been drawn up. However, there is nothing in the plan to indicate a separate medical space with a washing facility. It was not possible to confirm whether the premises are likely to meet the requirements because of the work remaining to be done.
- The proprietor has not ensured that the standards in this part are likely to be met.

Part 6. Provision of information

Paragraph 2(1), 32(1)(a), 32(1)(b), 32(1)(c), 32(1)(d), 32(1)(g), 32(1)(h), 32(1)(i), 32(2), 32(2)(a), 32(2)(b), 32(2)(b)(i), 32(2)(d), 32(3), 32(3)(a), 32(3)(b), 32(3)(c), 32(3)(d), 32(3)(e), 32(3)(f) and 32(3)(g)

- Leaders have produced information about the intended curriculum. An assessment policy that details the arrangements for assessing pupils' progress in learning is also available.
- Leaders intend to provide an annual written report on each pupil's progress and attainment. The reports will provide a commentary on how well pupils have engaged in their learning as well as their achievements in English, mathematics and science.
- Leaders intend to keep a statement of funding for each pupil who has an education, health and care plan. This will detail the support that the school provides along with the use of funding which is matched to pupils' needs.
- The school's complaints policy does not include information about the right of parents to have a panel hearing, should they disagree with the outcome of a complaint.
- The proprietor has not ensured that information about admissions and exclusions has been incorporated into the school's policy.
- The proprietor has not ensured that the standards in this part are likely to be met.

Part 7. Manner in which complaints are handled

Paragraph 33, 33(a), 33(b), 33(c), 33(d), 33(e), 33(f), 33(g), 33(h), 33(i), 33(i)(i), 33(i)(ii), 33(j), 33(j)(i), 33(j)(ii) and 33(k)

- Although a complaints procedure is in place, it does not detail the arrangements for complaints to be raised at a panel hearing. The proprietor has not identified a suitable person to act as an independent reviewer.
- The policy does not detail the arrangements for parents to be accompanied to a panel hearing.

- The standards for the manner in which complaints are handled are unlikely to be met.

Part 8. Quality of leadership in and management of schools

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

- There are several standards that are not likely to be met.
- Although leaders intend to actively promote the well-being of pupils, the absence of the single central record which summarises the checks on staff recruited to work in the school means that this standard is unlikely to be met.
- The standard on the quality of leadership in and management of the school is unlikely to be met.

Schedule 10 of the Equality Act 2010

- The plan for the refurbished building has been designed to be accessible to people with disabilities. Leaders intend to adapt the curriculum, when needed, to meet pupils' learning needs. This is set out in the school's special educational needs policy.
- The proprietor has ensured that the requirements of the Equality Act 2010 are likely to be met.

Compliance with regulatory requirements

The school is unlikely to meet the requirements of the schedule to the Education (Independent School Standards) Regulations 2014 ('the independent school standards') and associated requirements, as set out in the annex of this report.

Proposed school details

Unique reference number	147660
DfE registration number	895/6009
Inspection number	10132240

This inspection was carried out under section 99 of the Education and Skills Act 2008, the purpose of which is to advise the Secretary of State for Education about the school's likely compliance with the independent school standards that are required for registration as an independent school.

Type of school	Independent day school
School status	Independent school
Proprietor	Supporting Futures Limited
Chair	Julie Collings
Headteacher	Julie Ahern
Annual fees (day pupils)	Not yet determined
Telephone number	01625 871363
Website	N/A
Email address	rebekah.barry@supportingfutures.co.uk
Date of previous standard inspection	Not previously inspected

Provider already operating

Number of pupils of compulsory school age	N/A
Number of pupils of compulsory school age for whom a statement is maintained under section 324, or who is looked after by a local authority	N/A
Total hours operating as a school per week	N/A
Total hours of teaching provided per week	N/A

Pupils

	School's current position	School's proposal	Inspector's recommendation
Age range of pupils	N/A	11–18	11–18
Number of pupils on the school roll	N/A	4	4

Pupils

	School's current position	School's proposal
Gender of pupils	N/A	Boys
Number of full-time pupils of compulsory school age	N/A	4
Number of part-time pupils	N/A	N/A
Number of pupils with special educational needs and/or disabilities	N/A	4
Of which, number of pupils with an education, health and care plan	N/A	Not yet determined
Of which, number of pupils paid for by a local authority an education, health and care plan	N/A	Not yet determined

Staff

	School's current position	School's proposal
Number of full-time equivalent teaching staff	N/A	1
Number of part-time teaching staff	N/A	Not yet determined
Number of staff in the welfare provision	N/A	Not yet determined

Information about this proposed school

- The proposed school is situated in a residential garage attached to a children's home.
- The school will be part of Supporting Futures, which has a number of care homes for children.
- The conversion of the garage is due for completion in January 2020.
- The school will provide education for pupils with SEND. Leaders expect that most pupils will have autism spectrum disorder and/or social, emotional and mental health needs.
- Leaders may use links with local colleges to provide vocational courses for individual pupils.

Information about this inspection

- This inspection was commissioned by the Department for Education in order to confirm whether the school was likely to meet the independent school standards and other requirements needed to operate as an independent school.
- This was the first pre-registration inspection of the proposed school.
- The inspector held discussions with the person in post as the education link between the school and the home. The manager of the home was also present during these discussions.
- The inspector toured the site of the proposed school, accompanied by leaders. She visited the building currently being reconstructed.
- The inspector scrutinised the documents provided by the school, including the proposed school's safeguarding policy and child protection policy. She reviewed other policy documents. She scrutinised curriculum planning, proposed schemes of work and plans for assessment.
- The inspector checked the school's likely compliance with the independent school standards.

Inspection team

Naomi Taylor, lead inspector

Her Majesty's Inspector

Annex. Compliance with regulatory requirements

The school is unlikely to meet the following independent school standards

Part 1. Quality of education provided

- 3(f) utilises effectively classroom resources of a good quality, quantity and range;

Part 3. Welfare, health and safety of pupils

- 7 The standard in this paragraph is met if the proprietor ensures that–
 - 7(a) arrangements are made to safeguard and promote the welfare of pupils at the school; and
 - 7(b) such arrangements have regard to any guidance issued by the Secretary of State.
- 15 The standard in this paragraph is met if the proprietor ensures that an admission and attendance register is maintained in accordance with the Education (Pupil Registration) (England) Regulations 2006[13].

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

- 18(2) The standard in this paragraph is met if–
 - 18(2)(a) no 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;
 - 18(2)(b) 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;
 - 18(2)(c) the proprietor carries out appropriate checks to confirm in respect of each such person–
 - 18(2)(c)(i) the person's identity;
 - 18(2)(c)(ii) the person's medical fitness;
 - 18(2)(c)(iii) the person's right to work in the United Kingdom; and
 - 18(2)(c)(iv) where appropriate, the person's qualifications;
 - 18(2)(d) 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;

- 18(2)(e) 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
- 18(3) 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.
- 19(2) The standard in this paragraph is met if–
 - 19(2)(a) a person offered for supply by an employment business to the school only begins to work at the school if the proprietor has received–
 - 19(2)(a)(i) written notification from the employment business in relation to that person–
 - 19(2)(a)(i)(aa) 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;
 - 19(2)(a)(i)(bb) 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
 - 19(2)(a)(i)(cc) 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; and
 - 19(2)(a)(ii) a copy of any enhanced criminal record certificate obtained by an employment business before the person is due to begin work at the school;
 - 19(2)(b) 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;
 - 19(2)(c) 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);
 - 19(2)(d) the proprietor, in the contract or other arrangements which the proprietor makes with any employment business, requires the employment business to provide–
 - 19(2)(d)(i) the notification referred to in paragraph (a)(i); and

- 19(2)(d)(ii) a copy of any enhanced criminal record certificate which the employment business obtains,
- 19(2)(e) except for those persons to whom sub-paragraph (4) applies, in the case of supply staff who care for, train, supervise or are in charge of boarders, the proprietor checks that the relevant parts of Standard 14 of the National Minimum Standards for Boarding Schools or where applicable, Standard 14 of the National Minimum Standards for Residential Special Schools are complied with.
- 19(3) 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.
- 20(6) The standard in this paragraph is met in relation to an individual (“MB”), 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–
 - 20(6)(a) MB–
 - 20(6)(a)(i) is not barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that individual is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 of that Act; and
 - 20(6)(a)(ii) 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;
 - 20(6)(b) subject to sub-paragraphs (7) to (8), the Chair of the school makes the following checks relating to MB–
 - 20(6)(b)(i) where relevant to the individual, an enhanced criminal record check;
 - 20(6)(b)(ii) checks confirming MB’s identity and MB’s right to work in the United Kingdom; and
 - 20(6)(b)(iii) 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;
- 21(1) The standard in this paragraph is met if the proprietor keeps a register which shows such of the information referred to in sub-paragraphs (3) to (7) as is applicable to the school in question.

- 21(2) 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(3) The information referred to in this sub-paragraph is–
 - 21(3)(a) in relation to each member of staff (“S”) appointed on or after 1st May 2007, whether–
 - 21(3)(a)(i) S’s identity was checked;
 - 21(3)(a)(ii) 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;
 - 21(3)(a)(iii) 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;
 - 21(3)(a)(iv) checks were made to ensure, where appropriate, that S had the relevant qualifications;
 - 21(3)(a)(v) an enhanced criminal record certificate was obtained in respect of S;
 - 21(3)(a)(vi) checks were made pursuant to paragraph 18(2)(d);
 - 21(3)(a)(vii) a check of S’s right to work in the United Kingdom was made; and
 - 21(3)(a)(viii) checks were made pursuant to paragraph 18(2)(e),
 - 21(3)(b) 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(4) 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(5) The information referred to in this sub-paragraph is, in relation to supply staff–
 - 21(5)(a) whether written notification has been received from the employment business that–
 - 21(5)(a)(i) checks corresponding to those referred to in sub-paragraph (3)(a)(i) to (iv), (vi) and (vii) have been made to the extent relevant to any such person; and

- 21(5)(a)(ii) 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,
 - 21(5)(b) whether a check has been made in accordance with paragraph 19(2)(e) together with the date the check was completed; and
 - 21(5)(c) where written notification has been received from the employment business in accordance with a contract or other arrangements referred to in paragraph 19(2)(d) that it has obtained an enhanced criminal record certificate, whether the employment business supplied a copy of the certificate to the school.
- 21(6) 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(7) 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–
- 21(7)(a) whether each check referred to in sub-paragraph (6) was made; and
 - 21(7)(b) whether an enhanced criminal record certificate was obtained, together with the date on which any check was completed or certificate obtained.

Part 5. Premises of and accommodation at schools

- 23(1) Subject to sub-paragraph (2), the standard in this paragraph is met if the proprietor ensures that–
- 23(1)(a) suitable toilet and washing facilities are provided for the sole use of pupils;
- 24(1) The standard in this paragraph is met if the proprietor ensures that suitable accommodation is provided in order to cater for the medical and therapy needs of pupils, including–
- 24(1)(a) accommodation for the medical examination and treatment of pupils;
 - 24(1)(b) accommodation for the short term care of sick and injured pupils, which includes a washing facility and is near to a toilet facility; and
 - 24(1)(c) where a school caters for pupils with complex needs, additional medical accommodation which caters for those needs.
- 24(2) The accommodation provided under sub-paragraphs (1)(a) and (b) may be used for other purposes (apart from teaching) provided it is always readily available to be used for the purposes set out in sub-paragraphs (1)(a) and (b).

- 25 The standard in this paragraph is met if the proprietor ensures that the school premises and the accommodation and facilities provided therein are maintained to a standard such that, so far as is reasonably practicable, the health, safety and welfare of pupils are ensured.
- 26 The standard in this paragraph is met if the proprietor ensures that the acoustic conditions and sound insulation of each room or other space are suitable, having regard to the nature of the activities which normally take place therein.
- 27 The standard in this paragraph is met if the proprietor ensures that–
 - 27(b) external lighting is provided in order to ensure that people can safely enter and leave the school premises.
- 28(1) The standard in this paragraph is met if the proprietor ensures that–
 - 28(1)(a) suitable drinking water facilities are provided;
 - 28(1)(b) toilets and urinals have an adequate supply of cold water and washing facilities have an adequate supply of hot and cold water;
 - 28(1)(c) cold water supplies that are suitable for drinking are clearly marked as such; and
 - 28(1)(d) the temperature of hot water at the point of use does not pose a scalding risk to users.
 - 28(2)(a) they are readily accessible at all times when the premises are in use

Part 6. Provision of information

- 32(3)(a) particulars of the school’s policy on and arrangements for admissions, misbehaviour and exclusions;

Part 7. Manner in which complaints are handled

- 33 The standard about the manner in which complaints are handled is met if 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–
 - 33(f) 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(g) ensures that, where there is a panel hearing of a complaint, one panel member

is independent of the management and running of the school;

- 33(h) allows for a parent to attend and be accompanied at a panel hearing if they wish;
- 33(i) provides for the panel to make findings and recommendations and stipulates that a copy of those findings and recommendations is–
- 33(i)(i) provided to the complainant and, where relevant, the person complained about; and
- 33(i)(ii) available for inspection on the school premises by the proprietor and the head teacher;

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.

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