



Ursuline
High School
WIMBLEDON

Voluntary Aided 11-18 Roman Catholic School for Girls
Headteacher: Ms Julia Waters BSc (Hons) MA

8th November 2021

Ofsted
Piccadilly Gate
Store Street
Manchester M1 2WD

1. This is the Ursuline High School (“**the School**”) response and request for an internal review of the draft report provided on 1 November 2021 (“**the Report**”). The Report relates to an inspection that took place on 12 and 13 October 2021 and to deep dives across 5 subjects: English, Mathematics, Science, History and Drama.
2. The Report’s findings in respect of the School are:
 - Overall effectiveness Good
 - The quality of education Good
 - *Behaviour and attitudes Outstanding*
 - *Personal development Outstanding*
 - Leadership and management Good
 - *Sixth-form provision Outstanding*
 - *Previous inspection grade Outstanding*
3. The School’s position is that the Report and its findings are wrong for the reasons set out in this document and specifically, that the outcome is not justified by reference to evidence and facts. The Report itself is inaccurate, imprecise and ambiguous and is therefore misleading and fails to provide an accurate evaluation of the School. The School meets the criteria for Outstanding across all areas.
4. The Inspection Team failed to take into account all the evidence to evaluate what it is like to be a student at the Ursuline High School. The Team disproportionately amplified one thread of enquiry and used it to draw conclusions on the quality of education.
5. The Report and outcome:
 - (a) ignore key evidence;
 - (b) reach conclusions that are not supported by the evidence; and
 - (c) reach conclusions that are contradicted by the evidence.
6. Accordingly, it is not a reliable and/or fair and/or proportionate account of the School.

Crescent Road
Wimbledon
London SW20 8HA

Tel: 020 8255 2688
Fax: 020 8255 2687
Visitors’ Entrance: **The Downs**

Website: www.ursulinehigh.merton.sch.uk
Email: enquiries@ursulinehigh.merton.sch.uk
Twitter: @UrsulineHighSch



Background

(a) Pre-Inspection

7. On 11 October 2021, the School's headteacher, Julia Waters, was informed that Ofsted inspectors would visit the School on 12 and 13 October 2021. She spoke with the lead inspector, Stephen Adcock ("**the Lead Inspector**") on 11 October 2021 and for the one hour fifty minutes call, the discussion centred on context, the improvements since last inspection, strengths, staffing issues, behaviour and attitudes, personal development but mostly about Curriculum intent and implementation and Sixth Form. He advised the Head that the inspectors would conduct deep dives across the 5 subjects of: English, Maths, Science, History and Drama.
8. There was scant discussion and/or regard paid to Ofsted's School Inspection Handbook¹ ("**the Handbook**") insofar as it indicates that Ofsted inspectors recognise that "most schools will have been unable to implement the curriculum in the usual way during the COVID-19 pandemic...and will seek to understand how the school adapted and prioritised the curriculum from September 2020". This did not happen.
9. On the same date, the Head advised the Chair of Governors and Link governors about the inspection and the areas covered in the conversation but also how it centred on the intent and implementation of the Curriculum with no reference to impact.

(b) Inspection, Day 1

10. During the first day of the inspection, the inspection team undertook the deep dives, meeting teachers and pupils, reviewed safeguarding and the teaching of PSHE across the whole school and reviewed the surveys of students, staff and parents.
11. At the end of Day 1, the inspectors were wholly effusive about the quality of education on offer at the School. The Lead Inspector was fulsome and successfully worked at triangulating intent, implementation and impact. The feedback and observations are summarised below from the School leaders' contemporaneous records:

(a) English

- Ambitious curriculum seeing the world through different eyes
- Disadvantaged and EAL DOING REALLY WELL
- Range of enrichment leading to a love of the subject beyond lessons
- Strong knowledge
- Teachers tailor questioning to recap on prior learning
- Students responding to written comments
- Pupils move around calmly
- During Covid students were well supported better than other schools
- Schools embraces diversity evidence of racial equality towards one another making English lessons more relevant

¹ [School inspection handbook - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97822/school-inspection-handbook-2019.pdf)

- Teachers well supported with CPD

(b) Mathematics

- Curriculum plan meets NC
- Sequencing used effectively
- Regular feedback to students
- Results
- Confident responses to Maths
- Well-structured lessons
- Mastery drive
- Gaps in knowledge closes
- SEND Similar progress
- Expectations are high so students take risks
- Memory of past work was strong
- Attentive quick to respond
- Clear vision in Maths

(c) Science

- Curriculum meets NC and beyond it
- Fundamental vision science serves the community
- Learn about and explain the world they live in
- Pupils and staff know the big picture
- Lesson content was clearly linked so much so pupils could speculate about what was coming next
- Good subject knowledge all Science degrees Delivering and generally remembering key ideas and concepts
- Students can demonstrate their knowledge and are proud of their work
- Sense of standards and high levels of knowledge transfer
- Positive both in main school and Sixth Form
- Pupils well prepared for next phase of learning especially 9 into 10 and 11 into 12.

(d) History

- Ambitious and carefully planned
- Extra-curricular trips: enrichment excellence
- Good sense of how it contributes to open minded confident women who have an ownership of the curriculum
- The curriculum reflects the School's diversity e.g. Middle East unit, Empire unit Slavery and abolitions
- Local level: Suffragettes in Wimbledon
- Students have pride and ownership and enables them to develop character
- Students verbally strong and enthusiastic
- Students proud of their teachers in the pandemic
- Mutual assured destruction was highlighted as a term wasn't well explained and the laptop definition could have been more effectively utilised by the ECT.
- The Lead Inspector posed the question does assessment really focus on the key components of each subject?

- The Lead Inspector wanted students to have subject specific language at effortless fingertip recall” during / post pandemic.

(e) Drama

- The inspector, Sam Haines, did not follow the structure of feedback form the other deep dives.
- He began with noting the Head of Department was not convincing about the role knowledge has to play.
- Specialist environment noted
- Pupils were confident performers in the lesson
- Students’ recall was good
- Peer assessment was effective
- Small selection engaged in Drama in Year 10
- Inspector noted one SEND EHCP student relayed she had not been studying Drama as she was in intervention. (At this point the school noted Drama is not a NC subject and that there are enrichment clubs and productions for students to join).
- Feedback concluded that outcomes ie student performance was confident and addressed and countered the concerns about a very nervous Head of dpt.

12. In summary the Lead Inspector noted:

- (a) *real curriculum ambition;*
- (b) *real evidence of curriculum being adapted to meet the needs of the community;*
- (c) *Serviam- developing gifts and talents for the benefit of others - played out in different subjects with striking contribution;*
- (d) *Great respect for one another.*

13. He identified questions and topics for the next day:

- (a) the vocabulary being used and developed across the School;
- (b) emerging hypothesis regarding how teachers about the support for weaker readers in terms of language development by specifically looking at EHCP and SEND students;
- (c) 16-19 curriculum focus; and
- (d) further testing around the ambition of the curriculum.

14. However, his overall assessment was by the end of Day 1 that the School was delivering “stellar outcomes”.

(c) Inspection, Day 2

15. At the start of Day 2, the Lead Inspector elaborated on the hypotheses for Day 2:

- i. *In many subjects, curriculum intent and implementation is securely embedded. To what extent is this systemic throughout the curriculum?*
- ii. *In some subjects, pupils do not remember subject specific vocabulary. Is this systemic throughout the curriculum?*
- iii. *The curriculum enables pupils to achieve well. Do SEND pupils benefit from the curriculum as much as other pupils?*

16. The School notes that curriculum impact was inappropriately and unreasonably ignored by the Lead Inspector when considering curriculum intent and implementation. He disproportionately followed one line of enquiry which led to the exclusion of other relevant evidence. This left him unable to make a holistic and accurate judgement about the quality of education.
17. The Lead Inspector advised the Headteacher that he had overnight reviewed his notes from a Year 7 History class and was concerned that the Year 7 students had not been able to articulate the principle of the rule of law. The implication was that this was highly significant and could be indicative of a systemic issue in the quality of education.
18. As a result, the Head arranged for him to meet with other History students across the School and he subsequently met with students across Key Stages 3, 4 and 5 to illustrate students' knowledge and understanding of the History curriculum. The Lead Inspector reiterated his view that Year 8 students were not secure in some concepts that the curriculum sets out to teach in Year 7. There was *no* reference to *impact* which challenged this assertion: that is, stellar outcomes and destinations of Year 11 and Year 13 students (including a student accepting a place to study History at Balliol College, Oxford). At the same time the Lead Inspector explained that for the overall judgement to be outstanding the Sixth Form judgement had to be outstanding given its size. In the meeting the evening before there had been no signposting that the Sixth Form was not outstanding.
19. The Lead Inspector further suggested that the subject leader for Drama had not spoken knowledgeably enough about the curriculum. The Head arranged a further opportunity for him to speak with the inspector, Sam Hailey, about subject specific knowledge taught in Drama. There was no feedback on this interview.
20. Notwithstanding this, the inspector followed this line of enquiry into ART. The Headteacher had made clear to inspectors that this subject did not have a Head of Department and the current teacher in place was a part time ECT and had been in the school for a mere *12 days*.
21. On this second day, the inspectors further met with subject leaders for Geography, Languages, Art and Music. In addition, they met with the School's SENCO and Careers Lead. The Lead Inspector met with Sixth Form leaders and attended KS5 lessons. The Lead Inspector referenced a visit to a Year 7 Geography class but no other Geography lesson after speaking to 4 SEND students in the class in which he had encountered a mixed response: one was terrified, one said nothing and two were able to recall contours. The Lead Inspector commented on not liking the structures used to deliver the lesson objectives but did *not* qualify it by evaluating the *impact* either in the books or over time. He made no comment on the evidence he sought in the books which suggests a conclusion as drawn but not qualified.
22. The Lead Inspector met in person with the following governors:
 - Claire Thorogood, Chair
 - Lisa Thefaut, Vice-Chair
 - Estelle Lambert, Curriculum Link Governor
 - Karen Peck, Safeguarding Link Governor
 - Elaine Killerby, SEND Link Governor
 - Fiona Razvi, Sixth Form Link Governor
 - Beau Fadahunsi, EDI Link Governor
 - Ardle O'Hanlon, Pupil Premium and Disadvantaged Link Governor

23. He asked the governors the following questions:

- i. What is your opinion of the School?
- ii. How do you ensure that the subject curriculum quality is consistent throughout the School?
- iii. How do we ensure SEN and Disadvantaged children are not at educational disadvantage?
- iv. Why is Sixth Form not as stellar as KS4?
- v. How do you support the SLT?

24. An inspector also met with Steve Williams – an education consultant with the Local Authority with extensive experience as a former headteacher, local authority adviser and Ofsted inspector. During his meeting with the inspector, Mr Williams led the inspector through the LA’s methodology of external review as well as specific reviews of the School including those in relation to SEND, the annual 6th Form Review, Safeguarding Review and deep dives (including in Maths). He referred the inspector to the sustained journey of improvement made in 6th Form – to the improvement in outcomes and how they had been achieved.

25. Mr Williams answered the questions put to him about the School including:

- i. What is the Local Authority’s view of the School?
- ii. How do you reach judgements about the School?
- iii. How do you know that the 6th Form is outstanding?
- iv. What are the strengths of the Governing Body?
- v. Issues arising out of the Covid pandemic and the School’s management of remote learning and monitoring of students.

26. Mr Williams summarised his view of the School as a “flagship School” that was “exemplary in all respects”.

(d) Feedback Meeting

27. As required under the Handbook, Lead Inspector fed back to the Head and Senior Leadership Team his findings from the inspection. Under the Handbook, he was required to provide sufficient detail to enable them to understand how judgements were reached in order for them to understand how they could begin to “tackle any areas for improvement.”

28. Day 2 had begun with the hypotheses outlined above.

(a) With regards hypothesis 1... to what extent is curriculum intent and implementation securely embedded? And to what extent is this systemic throughout the curriculum?

- This has not been answered. Which subjects have a curriculum intent and implementation which is not securely embedded?
- Again, impact was omitted in the considerations of this line of enquiry.

(b) With regards Hypothesis 2 in some subjects pupils do not remember subject specific vocabulary including in relation to subject specific vocabulary *throughout the curriculum*.

- There was a real and obvious paucity of evidence presented to support this:
 - One Year 7 Art lesson with an ECT noted earlier.

- In Music mini white boards used to check terminology effectively. He described its effective in the moment assessment.
 - Student feedback to inspectors was that teachers were always testing when we came back and helping us catch up.
 - The Lead Inspector said with reference to SEND the environment and relationships were very good and repeatedly used vocabulary was working very effectively.
 - The Lead Inspector had been content with the History students' ability to articulate appropriately subject knowledge in Key Stages 4 and 5.
29. At no time was there any suggestion that the inspectors had identified any *systemic* issues across the curriculum from their inspection of both deep-dive and non-deep-dive subjects over the two days. Further the evidence in relation to the SEND hypothesis was very strong; SEND students at the School have full access to the curriculum and their progress and attainment mirror that of the rest of the School.
30. In the feedback the Lead Inspector referenced gaps in subject leadership in *History, Art and Drama*. This simply has not been evidenced legitimately, fairly and reasonably:
- (a) In History the evidence is based solely on oral recall of the work completed in Year 7 by some current Year 8 students.
 - (b) In Art, the inspectors failed to look at the outcomes of Art students in any year group and/or acknowledge that students had not accessed their full entitlement to Art in Year 7 due to lockdown.
 - (c) The conclusion is disproportionately evidenced from ECT teachers at the exclusion of the whole provision in History and Art across the key stages.
 - (d) There was no evidence in Drama to support these findings.
31. The Lead Inspector nevertheless used these examples as the basis for judging the School to be 'Good' (in terms of its quality of education) which automatically limited judgement of its (a) overall effectiveness and (b) leadership and management to 'Good' as well.
32. Of Governors, the Lead Inspector commented that they had been strong on Personal Development and Behaviour but not on Curriculum. He further commented that they had not been able to explain how they would hold the School's leadership to account.

The Report

33. The Report makes the following findings of fact:
- (a) *"..pupils with special educational needs and/or disabilities (SEND) and disadvantaged pupils....achieve well."*
 - (b) *"teachers encourage pupils to connect their learning to the world around them. Pupils discuss complex issues such as climate change and social justice with confidence and maturity. In a **few subjects**, leaders have not planned the curriculum as carefully. This means that on occasions some pupils do not learn and remember as much as they could"*
 - (c) *"In years 7-11, **most subjects** are planned thoroughly. This ensures that pupils' understanding develops well. However, **in a few subjects, leaders** have not thought as carefully about what it is they want pupils to learn and remember. Sometimes this means that **teachers'** use of assessment does not focus sharply on the specific things that all pupils should know. As a result,*

*pupils find it harder to remember **key concepts** that they have **recently covered in class, such as the rule of law in history.***

- (d) *“teachers in the sixth form expect the very best from their students. They use their subject expertise to check students’ understanding and deepen their knowledge. Students write and speak with maturity, explaining their learning in depth. They understand and use technical and specialist vocabulary including in vocational subjects. Students have lively debates and discussions in lessons such as PSHE. Teachers check pupils’ understanding of important knowledge, for instance what they have learned in relationships and sex education. Students told inspectors that this gives them confidence to speak up about issues that matter to them”.*
- (e) *“in **a few subjects, leaders have not planned the curriculum as precisely. This means that teachers** are not fully clear on the key knowledge that all pupils must learn. Sometimes, teaching does not identify and revisit the knowledge and concepts that children need to be secure with. **Leaders** should strengthen curriculum planning in these subjects so that **teachers** know exactly what all pupils need to learn and can check that **pupils** have understood this learning well.”*
- (f) *“Inspectors discussed the impact of the pandemic with school leaders and have **taken that into account in their evaluation**”*

34. The Report made clear therefore that in the view of Ofsted inspectors, failings and areas for improvement related to a *number of subjects, teachers, leaders and across Key Stages 3 and 4*. In other words, the Report suggests systemic and endemic areas for improvement. No reference was made to the very limited example of students forming the basis of this overarching judgement.

Grounds for Review

35. Ofsted’s role is to make sure that organisations providing education, training and care services in England do so to a high standard for children and students. Its stated priorities include ensuring that all of its work is evidence-led and that its evaluation tools and frameworks are valid and reliable.

36. Unfortunately, the Report does *not* reflect an evidence-led approach to the School’s inspection and/or a valid and reliable evaluation.

37. The School seeks a review of the Report and outcome. It disputes the findings that its overall effectiveness, quality of education and leadership and management were not – by reference to the body of evidence available to inspectors - Outstanding.

(a) Overall Effectiveness

38. According to the Handbook, reaching a judgement of outstanding is a “challenging and exacting judgement”:

*“In order to reach this standard, inspectors will determine whether the school meets all the criteria for good under that judgement, and does so **securely and consistently**. In other words, it is not enough that the school is strong against some aspects of the judgement and not against others, but it must meet each and every good criterion. In addition, there are further criteria set out under the outstanding judgement, which the school will also need to meet. Our aim in making this change is that schools should only be judged outstanding in a particular area if they are performing exceptionally, and this exceptional performance in that area is **consistent and secure** across the whole school.”*

39. In order to reach their judgement, inspectors must use all their evidence to evaluate:

- a) what it is like to attend the school
- b) consider the provision of 6th form provision and the size of the provision in relation to the size of the School and, before making the final judgement on overall effectiveness,
- c) inspectors will always consider the spiritual moral social and cultural development of pupils at the School and
- d) evaluate the extent to which the School's education provision meets different pupils' needs including pupils with SEND.

40. The Lead Inspector's decision to place a wholly disproportionate emphasis on two examples from History and Art in Year 7 and Year 8. This represented a wholesale failure to evaluate "all the evidence" as per the requirements in paragraph 32 above.

41. In particular, there is no evidence that he considered – in reaching his judgement – the facts that the students' experience of attending the School was wholly positive, his own assessment that the provision in the School's large 6th Form was outstanding, the School's exemplary Spiritual Moral Social and Cultural Development of its students and the outstanding progress and attainment of its SEND students. In terms of the latter, the Report stated that such students "*achieve well*". This is not accurate; on any assessment, SEND students at the School make outstanding progress (as evidenced by the fact that there is no gap between their progress and the rest of the cohort). The Inspector himself acknowledging the school's stellar outcomes.

42. This evidence – combined with outcomes across the School, how well-prepared students are at all stages for their next phase of learning at KS4, their contribution to the community and society, their values and attitudes, confidence, willingness and ability to contribute, destinations of its leavers, retention into Year 12 and retention into Year 13 – should have weighed appropriately and properly in the balance. In addition, the parent view strongly and overwhelmingly supports this:

- 98% report expectations as high;
- 94% are happy with their daughter's education.

43. The full body of evidence shows plainly that the overall effectiveness is "secure and consistent". Instead, the Lead Inspector – by relying as he did on two examples of Year 7 and 8 History and Art students to judge the quality of education as 'good' - created a self-imposed restriction on his ability to fairly and properly rate the School's overall effectiveness.

44. As noted, the judgement in relation to 'overall education' was pre-determined according to his judgement that the quality of education was not outstanding (see below).

(b) Quality of Education

45. The following statements are taken from the Handbook:

"Inspectors will take a rounded view of the quality of education that a school provides to all its pupils, including the most disadvantaged pupils ... and pupils with SEND. Inspectors will consider the school's curriculum, which is the substance of what is taught with a specific plan of what pupils need to know in total and in each subject.

Inspectors will consider the extent to which the school's curriculum sets out the **knowledge and skills** that pupils will gain at each stage (we call this 'intent'). They will also consider the way that the curriculum developed or adopted by the school is taught and assessed in order to support pupils to build their knowledge and to apply that knowledge as skills (we call this 'implementation'). Finally, inspectors will consider the **outcomes** that pupils achieve as a result of the education they have received (we call this the 'impact').

The judgement focuses on **factors** that both research and inspection evidence indicate contribute most strongly to an effective education in which pupils achieve highly.

The curriculum sets out the aims of a programme of education. It also sets out the structure for those aims to be implemented, including the knowledge and skills to be gained at each stage. It enables the evaluation of pupils' knowledge and skills against those expectations. In secondary education, inspectors will expect to see a **broad, rich curriculum**.

As part of making the judgement about the quality of education, inspectors will consider **the extent to which schools are equipping pupils with the knowledge and cultural capital they need to succeed in life. It is the essential knowledge that pupils need to be educated citizens, introducing them to the best that has been thought and said and helping to engender an appreciation of human creativity and achievement.**

In order to **triangulate evidence effectively**, inspectors will ensure that they gather a **variety of these types of evidence in relation to the same sample of pupils**. Inspectors will also ensure that the samples of pupils they choose are sufficient to allow them to reach a valid and reliable judgement on the quality of education offered by the school overall.

Inspection experience and research show that the most important factors to consider are the following:

- A well-constructed, well-taught curriculum will lead to pupils learning more and so achieving good results. Such a curriculum contributes to evidence of impact. There need be no conflict between teaching a broad, rich curriculum and achieving success in examinations and tests.
- Disadvantaged pupils and pupils with SEND acquire the knowledge and cultural capital they need to succeed in life.
- Pupils are making progress in that they know more, remember more and are able to do more. They are learning what is intended in the curriculum.
- All learning builds towards an end point. Pupils are being prepared for their next stage of education, training or employment at each stage of their learning. Inspectors will consider whether pupils are ready for the next stage by the point they leave the school or provision that they attend.
- Pupils in sixth form are ready for the next stage and are going on to appropriate, high-quality destinations. Inspectors **will** also consider this.

46. There is no evidence of the Lead Inspector taking these "most important factors" into account and it is possible to state that if he had done so fairly and reasonably, he could not have judged the School to be "good" and not "outstanding".

47. The Handbook states clearly: "**Inspectors will not grade intent, implementation and impact separately. Instead, inspectors will reach a single graded judgement for the quality of education, drawing on all the evidence they have gathered and using their professional judgement**".

48. The Guidance issued when the new Framework was first introduced in 2019 reiterates these inspection principles with regard to the quality of education:

- *“the end result of a good, well-taught curriculum is that pupils know more and are able to do more. The positive results of pupils’ learning can then be seen in the standards they achieve. The EIF starts from the understanding that all of these steps are connected”.*
- It is about *“gathering this deep, rich evidence about the education that a school provides” – not about relying upon small samples of evidence - in one subject, topic or aspect, inspectors carrying out the pilot inspections have been careful not to rely on small samples of evidence.*

49. In the case of the School, the Lead Inspector failed to comply with Ofsted’s inspection framework and overarching principles:

- (a) He relied on a ‘small sample of evidence’ to support the finding of Good, not Outstanding, quality of education. In so doing, he failed to comply with Ofsted’s own framework and approach. The Report – by repeated reference to subjects, teachers and leaders in the plural suggests that *failures to plan the curriculum are systemic and endemic across a range of subjects and leaders*. This is wholly inaccurate and unsupported by the evidence.
- (b) He failed to triangulate evidence as required and/or to apply appropriate regard to the ‘deep, rich evidence’ of outstanding provision across the School. His finding that the quality of education was good, not outstanding, was based upon a disproportionate and distorted emphasis placed on a small-sample. The ‘end-result’ of the History taught at the School is illustrated in part by the excellent outcomes achieved in Key Stages 4 and 5 and wholly ignored in his assessment.
- (c) It is further clear that in direct contradiction to the inspection framework, the Lead Inspector’s decision on the quality of education was based solely on his findings in relation to *intent* in the curriculum planning. This was a fundamentally flawed approach; he should have adopted the holistic and overarching approach in relation to the evidence required of him:

“This EIF seeks to put a single, joined-up educational conversation at the heart of inspection. It is built around the connectedness of curriculum, teaching, assessment and standards within the ‘quality of education’ judgement. As a result, the inspection methodology for this judgement is structured to ensure that inspectors are able to gather evidence of how a school’s activities to deliver a high-quality education for its pupils connect and work together to achieve the highest possible standards”.

- (d) Ofsted states that it **will** when making judgements, **take a range of evidence into account**. This should have included Mr Williams’ assessment of the School as an ‘exemplary’ and ‘flagship’ school. As someone with a long-lasting and deep knowledge of the School, an experienced Local Authority adviser and Ofsted inspector his opinion – once sought – should have been properly considered and weighed in the balance. Given the absence of statutory assessments and qualifications for making a judgement paragraph 20 relating to external data Ofsted should have afforded more consideration to the reports produced by Steve Williams.
- (e) There is no evidence that the Lead Inspector took into consideration a range of evidence including the impact of Covid on Years 7 and 8. This is arguably the groups

for whom the impact of remote learning impacted most severely in terms of their development and adjustment to learning. This is despite the fact that the Handbook states: “*Inspectors recognise that most schools will have been unable to implement the curriculum in the usual way during the COVID-19 pandemic*”.

- (f) The Lead Inspector fundamentally and unreasonably failed to implement and comply with the framework of inspection to which he was subject:

“Inspectors will then draw all this evidence together from different pupils, classes and year groups.....The crucial element here is the connection between different pieces of evidence. Inspectors will not emphasise one specific type of evidence above all others. Instead, inspectors will focus on gathering evidence that is balanced and connected. Our research on work scrutiny and lesson visits has shown that having a variety of types of connected evidence strengthens the conclusions that inspectors are able to reach.

This evidence will always lead inspectors back to the overall quality of education on offer. The focus will not be on one particular lesson, book or pupil. Rather, the focus will be on the interconnection of all of these pieces of evidence and what they tell inspectors and leaders about whether pupils are learning the curriculum and making progress in the sense of knowing more, remembering more and being able to do more. The evidence the first inspections under the EIF is that this approach enables inspectors and leaders to build up a clear picture of whether the school is meeting the criteria set out in the ‘quality of education’ judgement.

Inspectors will not take a random sample of exercise books/folders/sketchbooks/electronic files and so on (which we refer to as ‘pupils’ books and other work’). Instead, they will scrutinise pupils’ books and other work across a faculty, department, subject, key stage or year group and aggregate insights to provide part of the evidence for an overall view of the quality of education. Inspectors will not evaluate individual workbooks or teachers. Inspectors will not use work scrutiny to evaluate teachers’ marking. Inspectors will connect work scrutiny to lesson visits and, where at all possible, conversations with pupils and staff.

Inspectors can use work scrutiny to contribute to an evaluation of whether the work that pupils do over time reflects the intended curriculum. Work scrutiny will help inspectors to form a view of whether pupils know more and can do more, and whether the knowledge and skills they have learned are well sequenced and have developed incrementally. Inspectors will synthesise what they find in order to contribute to their overall assessment of the quality of education across a faculty, department, subject, key stage or year group”.

50. Again, there was a wholesale failure by the Lead Inspector to meet the ‘crucial’ requirements of inspecting the School’s ‘overall quality of education’, to draw on and connect difference sources of evidence in order to ‘synthesise’ what his team found. Accordingly, the judgement is unreliable, unfair and unsupported by evidence.

51. The School considers that it meets in full and demonstrated evidence of outstanding quality of education:

Outstanding (1)

- The school meets all the criteria for a good quality of education **securely and consistently**.

- The quality of education provided is exceptional.

In addition, the following apply.

- The school's curriculum intent and implementation are embedded securely and consistently across the school. It is evident from what teachers do that they have a firm and common understanding of the school's curriculum intent and what it means for their practice. Across all parts of the school, series of lessons contribute well to delivering the curriculum intent.
- The work given to pupils, over time and across the school, consistently matches the aims of the curriculum. It is coherently planned and sequenced towards cumulatively sufficient knowledge and skills for future learning and employment.
- Pupils' work across the curriculum is consistently of a high quality.
- Pupils consistently achieve highly, particularly the most disadvantaged. Pupils with SEND achieve exceptionally well.

52. The evidence – the progress and attainment of students including SEND and Disadvantaged students at the School, the destinations, enrichment provision, quality of careers advice, the exemplary programme and delivery of PSHE, the consistent focus on SMSC through trail-blazer and wider partnerships, the capture of student voice – are achieved through the delivery of a securely and consistently outstanding curriculum.

53. The requirement for consistency and security is not – for obvious reasons – a demand for perfection. It is for what the School does day in and day out and what was properly recognised in the inspectors' feedback on Day 1.

54. There is evidence also that the Lead Inspector reached conclusions based upon inaccurate recollection of evidence. In his feedback meeting to the Head and the SLT, he stated that the governors:

- (a) did not have a good understanding of the Curriculum and in particular the 3i's; and
- (b) could not demonstrate how they would hold the Head and her team to account.

55. The contemporaneous notes of his meeting with governors would in fact demonstrate that the governors referenced knowledgeably and reliably the Curriculum and 3i's throughout their answers and discussion with him. Further, the Lead Inspector reached a detrimental finding in relation to 40(b) above when he had never asked governors how they would hold the Head and SLT to account. He had asked how they would support them.

56. This example is given as an illustration of the Lead Inspector's tendency to reach findings unsupported (and indeed contradicted) by the evidence.

Conclusion

57. The School was rated Outstanding in 2006. As noted in the Report, this was under a previous inspection framework. The Framework adopted by Ofsted in 2019 was, according to Ofsted,² in order provide a "more holistic view of standards, particularly focusing on the curriculum". The Guidance states:

² [Inspecting the curriculum \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/81122/inspecting-the-curriculum.pdf)

“The end result of a good, well-taught curriculum is that pupils know more and are able to do more. The positive results of pupils’ learning can then be seen in the standards they achieve. The EIF starts from the understanding that all of these steps are connected.

Top-level view: inspectors and leaders start with a top-level view of the school’s curriculum, exploring what is on offer, to whom and when, leaders’ understanding of curriculum intent and sequencing, and why these choices were made.

Deep dive: then, a ‘deep dive’, which involves gathering evidence on the curriculum intent, implementation and impact over a sample of subjects, topics or aspects. This is done in collaboration with leaders, teachers and pupils. The intent of the deep dive is to seek to interrogate and establish a coherent evidence base on quality of education.

Bringing it together: inspectors will bring the evidence together to widen coverage and to test whether any issues identified during the deep dives are systemic. This will usually lead to school leaders bringing forward further evidence and inspectors gathering additional evidence.

Further evidence-gathering activity will follow in order to test the emerging conclusions from this work. This is likely to include follow-up conversations with leaders, members of staff, those responsible for governance and pupils. It will usually also involve sampling of other areas of education within the school to probe questions that have emerged as a result of the deep-dive work.

It is crucial to note that inspectors will not reach judgements on the basis of any single inspection activity; rather, inspection judgements will be reached once inspectors have connected the different types and pieces of evidence in the manner set out above.

In gathering this deep, rich evidence about the education that a school provides in one subject, topic or aspect, inspectors carrying out the pilot inspections have been careful not to rely on small samples of evidence.

One deep dive is insufficient to form a view of the school’s provision, but a collection of deep, connected case studies of subjects, topics or aspects can allow inspectors to form a valid and reliable view of the education on offer, provided that it is subject to further evidence-gathering to test the systemic strengths and weaknesses of the curriculum.

*Once the inspector is in the midst of carrying out the deep dive, however, it is important that **they ensure that they can gather as much rich evidence as possible and make the connections between those pieces of evidence, rather than adhering to any strict or specific sequence.** The pilot inspections suggest that the EIF approach allows for **much greater depth of evidence to be gathered than the current framework does, and this evidence in turn is more rigorously triangulated.** Even when there are challenges on the first day, it is possible to bring all the evidence together and tie up loose ends on the second. **Bringing the evidence together and achieving connectedness is an important inspection skill, so this will be a focus area of inspector training. Some concerns exist over the possibility that if one subject which is the focus of the deep dive is a weak subject, then this could give a distorted view of the school, which is why we are proposing to look at four to six subjects in secondary schools and three to five in primary schools, depending on the size of the school and the inspection team. It is also why the follow-on activities to establish whether the issues and strengths identified in deep dives are systemic and replicated elsewhere in the school are so important.***

Our piloting has also reinforced our position that intent, implementation and impact are never to be treated as separate, disconnected sub-judgements. Inspectors will always seek to connect and triangulate evidence across the ‘quality of education’ judgement to form a single view of the quality of education provided.

58. Again, the Lead Inspector’s reliance on the unrepresentative sample of students from Years 7 and 8 is not consistent with Ofsted’s aims and prescribed inspection methodology. The Lead Inspector did not form a judgement of “good” – by reference to the quality of education and/or overall effectiveness and/or leadership and management – by reference to “as much rich evidence as possible” and/or seek to “make the connections” between different sources of evidence and/or “rigorously triangulate” the evidence. Accordingly, the Report and outcome do not reflect a fair, reasonable and appropriate inspection.

59. The School does not dispute the finding that the topic of the rule of law was not sufficiently explicit in the schemes of learning. The School is however disputing the disproportionate weight placed upon that fact to support the overall assessment that its quality of education is not therefore outstanding. That would be to place a undue and unjustified weight on that one piece of evidence and inconsistent with the overarching thesis that an accurate judgement on quality *must* be reached only after taking *all evidence into account*.

60. The School is fully aware that its Outstanding rating achieved in 2006 was based upon a different inspection framework. However, since then, the School has achieved and/or introduced the following:

- i. better results across all 3 Key Stages;
- ii. rigorous monitoring of the progress and attainment of all student groups including SEND, Disadvantaged and by reference to race and ethnicity;
- iii. an inclusive and rich curriculum that is broader and deeper than the National Curriculum;
- iv. laptops for every student from Year 7 onwards to aid greater independent learning and equal access;
- v. the addition of a new creative arts block for Music, Drama and Art teaching and extra-curricular activities;
- vi. a new sports facility;
- vii. a new off-site sports ground;
- viii. significantly enhanced enrichment provision including a dedicated ‘Festweek’;
- ix. A new chapel;
- x. New T Level offering for Key Stage 5;
- xi. Full adherence to the best practice requirements outlined by the Baker Clause;
- xii. Participation in a wide-range of partnership work including:

- Teach Wimbledon
- Mental Health Trailblazer
- Avila Partnership
- Ursuline Global Community
- Wimbledon College

61. On any basis and against any framework the School *is* an Outstanding School. It does not represent perfection. It is not required to. It is required to demonstrate that it *securely and consistently*

demonstrates exceptional performance across the School and it does so. Ursuline has consistently been recognised for outstanding outcomes nationally. The DFE performance tables also indicate outstanding progress at GCSE for 2019 and pre 2019 as does the ISDR:

ISDR Page 2

- *“Overall Progress 8 (10.8) was significantly above the national average and in the highest 20% of all schools in 2019 as well as in 2018 and 2017”*
- *“The Attainment 8 (59.6) as well as English (13.6) and Mathematics (10.8), Ebacc (17.1) and Open (18.2) elements were in the highest 20% of all schools in 2019 as well as in 2018 and in 2017”*
- *ASP*
- *Progress 8 for Disadvantaged students +0.57 National average for Like for Like students - 0.45.*
- *Indicating more than a full grade of difference at UHS for P8 component performance subjects.*
- *Disadvantaged attainment 8 at UHS was 50.23.*
- *This result is above the national average figure for non-disadvantaged students at 50.15 indicating Ursuline Disadvantaged students outcomes are higher than Non disadvantaged students’ national outcomes.*

62. These reported outcomes indicate *no subject area of weakness* and this applies also to the previous 2 years 2018 and 2017.

63. The Report fails to demonstrate a rational decision based upon evidence and a fair and proper application of Ofsted’s criteria. The only area for improvement would therefore be to ensure that (a) the Schemes of Learning in *Key Stage 3 History* sufficiently cover the rule of law and (b) the Schemes of Learning in Art are amended to ensure *catch up from Year 7 in Art as a result of the pandemic.*

64. This is *not* reflected in the Report which explicitly and implicitly suggests that the issues with failures in curriculum planning (intent) and implementation is systemic and endemic. *This is not accurate.* The outcomes in History and Art in Key Stages 3, 4 and 5 are evidence of that.

65. As noted above, the findings in relation to Sixth Form were:

“Teachers in the sixth form expect the very best from their students. They use their subject expertise to check students’ understanding and deepen their knowledge. Students write and speak with maturity, explaining their learning in depth. They understand and use technical and specialist vocabulary including in vocational subjects. Students have lively debates and discussions in lessons such as PSHE. Teachers check pupils’ understanding of important knowledge, for instance what they have learned in relationships and sex education. Students told inspectors that this gives them confidence to speak up about issues that matter to them.”

66. This statement is in fact true of the School as a whole. This was evidenced in the comments from the Inspectors at the end of Day 1. They could not have been more fulsome in their assessment of what they had seen and heard throughout the day across Key Stages 3 and 4 in the School. The lived experience of *all* students (including SEND and Disadvantaged students) combined with the depth and breadth of the curriculum on offer as well as outcomes at Key Stage 3 and 4 testify to that.

67. The Lead Inspector had asked governors why the Sixth Form was “not as stellar” as the rest of the School. His clear judgement at the time of asking this question (on Day 2) was that the Sixth Form would struggle to live up to the standards he had seen for himself in Key Stages 3 and 4 on Day 1. Instead, he recognised the Sixth Form as ‘outstanding’ as per the above statement. It does not then make any rational sense – based on the premise of his question to governors – to determine subsequently that the rest of the School is not what he had already plainly judged it to be: better than Sixth Form.

68. In 2019, Ofsted’s Chief Inspector, Amanda Spielman, stated in relation to Ofsted’s (then new) Framework:

"The new quality of education judgment will look at how providers are deciding what to teach and why, how well they are doing it and whether it is leading to strong outcomes for young people.

"This will reward those who are ambitious and make sure that young people accumulate rich, well-connected knowledge and develop strong skills using this knowledge.

"This is all about raising true standards. Nothing is more pernicious to these than a culture of curriculum narrowing and teaching to the test³."

69. The School is an exemplary school that meets in full the aims and objectives of the framework. It provides outstanding education across the whole school consistently and securely as evidenced by a vast body of evidence that far outweighs the limited examples relied upon by the Lead Inspector to downgrade the School.

70. The Sunday Times reported yesterday (7 November 2021) on the intention of Ofsted to downgrade outstanding schools with particular reference to those schools where the focus has been on “drilling children for exams”. The article further states that schools will be expected to “put on plenty of art, music, drama and sport lessons”. The Chief Inspector hopes for an “honest conversation” about where a school is now, not where it was and references the need for schools to address the “lives of teenagers outside lessons”.

71. *On each and every aspect of this ‘new’ assessment of schools, the School is today an outstanding school.* It has consistently regarded the education of its students as going far wider and deeper than academic attainment. As the Lead Inspector noted: *“the pupils embody the school motto of ‘serviam’.... Developing gifts and talents of individuals for the common good”.* The School offers countless examples of opportunities provided to its students to develop those ‘gifts and talents’ through a well-developed enrichment programme (including in KS5) and its equally extensive and exemplary PSHE programme which has indeed covered the issues identified so recently by the Chief Inspector. It does all of this whilst also ensuring that its students achieve their potential which is evidenced through outstanding progress and attainment and destinations.

³ [Ofsted inspections to focus on 'quality of education' over performance data | CYP Now](#)

72. Accordingly, we ask that Ofsted review its judgement by reference to the evidence and facts and recognise that the appropriate outcome is one that meets its own criteria and guidance: Outstanding across all areas.

Yours sincerely

Julia Waters
Headteacher

Claire Thorogood
Chair of Governors