

Our Rock Academy

The Old St Justus Church, Clifton Close, Rochester ME2 2HG

Inspection date

6 August 2025

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

Paragraphs 2(1) to 2(2)(b), 2(2)(d) to 2(2)(e)(iii), 2(2)(h) to 2A(1) and 2A(1)(b) to 4

- The proprietor proposes to establish a school for secondary-age pupils with special educational needs and/or disabilities (SEND). It will cater primarily for pupils with social, emotional and mental health (SEMH) needs or a diagnosis of autism.
- The proposed curriculum is likely to have sufficient breadth to meet requirements. The offer includes mathematics, English and science, as well as personal, social and health education (PSHE) and physical education (PE). There is also provision for learning in the arts and computing. The proposed school is currently developing plans for history. However, this is not identified as a taught subject in its curriculum policy.
- The quality of curriculum design varies. Sometimes, it identifies in detail what pupils should learn and when. However, in other areas the curriculum is not sufficiently specific about how pupils will build on prior knowledge. The proprietor has not given enough consideration to how the curriculum is to be adapted for the school's particular context.
- The proposal is to use a secondary mainstream curriculum entirely at age-related expectations and put the 'onus on teachers to differentiate' it for pupils. This intent does not take enough account of pupils' likely needs and starting points. Pupils placed in similar schools have usually experienced a disrupted education. They typically have significant gaps in their knowledge and skills. The proposed approach does not place sufficient emphasis on ensuring that pupils have secured strong foundations to build upon.
- The strategy for supporting struggling readers is at an early stage of development. The proprietor has identified a scheme to use but is awaiting the appointment of a suitable specialist to plan its implementation.
- The proprietor intends to use pupils' education, health and care (EHC) plans to inform 'personalised provision plans' for each pupil. Beyond teachers adapting their approaches in lessons, the school intends to provide additional 'therapeutic interventions'. It is unclear how the school plans to balance the time for interventions

with the demands of the proposed academic curriculum and provision for pupils' wider personal development.

- The school has sourced an age-appropriate PSHE programme. The content builds in a logical sequence that is likely to support pupils to develop their knowledge and understanding. This includes suitable age-related relationships and sex education (RSE). This is set out in the school's proposed RSE policy.
- Proposed arrangements for careers information, advice and guidance are likely to adequately satisfy the standards. The proprietor has sourced the support of an independent specialist company to provide this advice to pupils regularly. Other elements of careers education are threaded through the PSHE programme. The school would seek to support meaningful workplace experiences according to individual needs and aspirations.
- The proprietor expresses commitment to recruiting experienced and qualified teachers. It reports that this process has already begun with a science and mathematics specialist due to start shortly following this inspection. The headteacher, who also holds qualified teacher status, has plans to quality assure the effectiveness of teaching regularly.
- Policies and plans outline basic provision for assessment that is likely to meet requirements. The school proposes to combine the assessments and views of professionals, pupils, parents and carers with standardised testing as a starting point. This would be revisited through the annual review of pupils' EHC plans. Trained teachers would be responsible for ongoing assessment of pupils' progress through the curriculum in each subject. This would be periodically gathered, audited and reported to parents and carers.
- The proprietor has not ensured that the independent school standards (the standards) contained in this part are likely to be met.

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

Paragraphs 5 to 5(d)(iii)

- The proprietor believes strongly in promoting pupils' self-belief and giving them the same life opportunities as their peers in mainstream schools.
- The proposed curriculum for PSHE includes teaching about much of the content that is required by this part. This includes units of work that are likely to support pupils to learn about equalities. Plans include clear reference to the protected characteristics.
- There is an appropriate plan in place to support the development of pupils' understanding of fundamental British values. The school's programme exemplifies each of these values. It is likely to offer pupils opportunities to explore these concepts in discussions and activities. This includes topics on democracy and the rule of law, as well as tolerance and respect for other cultures. The proposed learning is likely to guard against exposing pupils to partisan views.
- The school proposes to take a 'joined-up approach' to promoting pupils' wider development by linking the content of PSHE with form-time activities and assemblies.

The programme is intended to be flexible so that it can be adapted to respond to pupils' needs, as well as situations and events in the school and wider world.

- The proprietor has ensured that the standard in this paragraph is likely to be met.

Part 3. Welfare, health and safety of pupils

Paragraphs 7 to 7(b)

- The proprietor does not demonstrate sufficient knowledge of statutory safeguarding guidance and requirements for schools, including around safer recruitment procedures. The lines between day-to-day safeguarding arrangements and the strategic oversight of safeguarding are blurred. The proprietor does not convey an understanding of how to check systematically that its published policy and procedures are implemented effectively and that they work as intended.
- The proprietor has not established clear and reliable procedures for dealing with allegations about adults. It has not ensured those with a key role in these processes have the necessary knowledge of procedures. This includes when to refer to the local authority designated officer. Those responsible do not have a consistent understanding of what the arrangements for keeping records of such concerns would be.
- The proprietor has not ensured that appropriate monitoring and filtering arrangements are in place. It intends to rely on the internet service provider's age restrictions, and staff manually monitoring pupils' internet use. The proprietor did not show sufficient knowledge of how these arrangements do not align with statutory guidance for schools. The proprietor did not demonstrate a clear understanding of how its practice would not provide the necessary protections and may place pupils at risk. This is particularly concerning given the likely additional vulnerabilities of proposed pupils.
- The proprietor aims to create an open safeguarding culture, where no concern is swept 'under the carpet'. The written safeguarding policy generally aligns with published guidance, although it does not always reference the most up-to-date versions. It includes a prominent helpful flowchart of what to do with concerns. The introduction makes clear that each 'child's welfare is of paramount importance'.
- The designated safeguarding lead has received the appropriate level of training. There is a planned programme of induction training for staff. This includes important aspects of welfare, health and safeguarding, including the school's processes for record-keeping. The school has sourced a suitable electronic system for keeping safeguarding records.

Paragraphs 9 to 16(b)

- The proprietor conveys high expectations of pupils' conduct and behaviour. There are plans to prioritise appropriate training for staff. For example, they will learn techniques, relevant to the proposed school's context, for building positive relationships and managing behaviour.
- The school has ensured that there are clear behaviour and anti-bullying policies in place. These set out appropriate processes, sanctions and reward systems to support

pupils in developing positive behaviours. Proposed arrangements for keeping records are sound. These are likely to support the school in making appropriate links between behaviour, attendance and safeguarding.

- The proprietor has produced the necessary policies for first aid, and health and safety. These set out responsibilities and arrangements at different levels that are likely to be workable. Provision for trained first aiders, first-aid equipment and keeping records are in place.
- An appropriate fire safety risk assessment has been carried out by a suitable person. The proprietor is clear about the report's recommendations regarding training staff and implementing procedures once the building is occupied. These things are included in the staff induction programme.
- The proposed staffing levels and deployment are likely to provide for the safe supervision of pupils. Arrangements for keeping registers of admissions and attendance are likely to meet requirements.
- The proprietor has not ensured that risk assessment procedures are sufficiently thorough or well informed. This is especially given the potential additional vulnerabilities of proposed pupils. The suggested arrangements for monitoring and filtering internet usage are one example of this.
- The proposed risk assessment policy includes a wide range of generic risk assessments. However, these do not always take enough account of the proposed school's specific context. The pre-registration inspection report under the proprietor's previous application expressed concern that there was only a low fence separating a neighbouring nursery's outdoor area and the proposed school's grounds. The proprietor has attempted to address this by installing a parallel wooden fence at a similar height. Alone, it does not fully resolve previous concerns. The proprietor does not show enough understanding of how this situation presents any potential risk. This is despite consideration of the age and SEMH needs and potential dysregulation of proposed pupils. There are no mitigations or control measures included in the outdoor risk assessment.
- The proprietor has not ensured that all the paragraphs contained in this part are likely to be met.

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

Paragraphs 18(2) to 18(2)(e), 18(3), 19(2) to 19(2)(d)(ii), 19(3), 20(6) to 20(6)(c), 21(1) to 21(3)(b) and 21(5) to 21(5)(c)

- The proprietor has not ensured a sufficiently rigorous approach to safer recruitment. It does not demonstrate the necessary knowledge and understanding of the different types of check. The single central record makes provision for logging the necessary details. However, there are gaps for those already appointed or involved in the management of the school.
- The single central record does not show any checks against relevant people that they had not been prohibited or restricted from participating in the management of an independent school. Initially, the proprietor was not clear what this check was or who

should have it. The proposed school could not demonstrate on the day of the inspection that these checks had been made.

- The proprietor does not demonstrate that it has taken full account of statutory guidance for schools around individuals who have lived or worked abroad. The single central record does not specify whether any additional checks have been made. The proprietor's criteria for making decisions about whether further checks are necessary is based entirely on timescales. This does not reflect a robust safer recruitment approach, particularly considering the potential additional vulnerabilities of proposed pupils.
- The proprietor has not ensured that all of the requirements in this part are likely to be met.

Part 5. Premises of and accommodation at schools

Paragraphs 23(1) to (24)(1)(b) and 24(2) to 29(1)(b)

- The proposed school's buildings and premises include sufficient space for the proposed number of pupils across four classrooms. There is also a spacious hall. There are several smaller rooms and spaces allocated as offices or areas suitable for therapeutic or other interventions.
- Separate toilets allocated for pupils and staff meet recommended ratios. Water does not present a scalding risk. The medical room meets all requirements. Mains drinking water is labelled, although not easily accessible from the classrooms. The proprietor intends to supplement this with a bottled dispenser unit and supply bottled mineral water in the meantime.
- Outdoor areas are sufficient for recreation. The ground is a mix of grass and hard surfaces, and the proprietor has installed some fixed gym equipment. The school also proposes to use facilities at a nearby sports centre with showers for PE.
- The proprietor has ensured that all standards in this part are likely to be met.

Part 6. Provision of information

Paragraphs 32(1) to 32(1)(d), 32(1)(f) to 32(2)(b) and 32(2)(b)(ii) to 32(4)(c)

- The school does not currently have a live website. The proprietor proposes to launch one if the school is registered. It has prepared almost all of the information that should either be provided to parents or be available on request. However, the school does not have any information about the educational and welfare provision for pupils who speak English as an additional language.
- The proprietor has ensured that the other requirements in this part are likely to be met. For example, it has sourced a format for producing annual reports to parents. The proprietor is aware of the information that it must provide to the local authority in respect of each pupil.
- The proprietor has not ensured that all the paragraphs contained in this part are likely to be met.

Part 7. Manner in which complaints are handled

Paragraphs 33 to 33(k)

- The school's written policy makes provision to consider informal and formal complaints in reasonable time scales. It details suitable arrangements for unresolved complaints to be heard by an appropriate panel of people. Proposed record-keeping arrangements are likely to meet requirements.
- It is likely that the requirements of this part would be met.

Part 8. Quality of leadership in and management of schools

Paragraph 34(1) to 34(1)(c)

- The proprietor has made progress in addressing some of the weaknesses identified at the time of the previous pre-registration inspection. However, significant concerns remain about the proposed school. This includes the proprietor's knowledge of safeguarding guidance, the standards, and what is required to run an effective and safe school for pupils with SEND.
- This lack of knowledge and understanding raises serious questions about the proprietor's ability to hold school leaders to account. The chair of governors was unavailable to speak with inspectors. However, given the range of concerns identified during this inspection, the proprietor has not demonstrated that it has secured effective governance arrangements.
- The proprietor states that it wants pupils to feel 'safe and happy'. However, the intended curriculum fails to recognise the nature of the pupils the school proposes to support. In particular, the proprietor has not considered enough how high academic demands on pupils can be adapted given their previous experiences and starting points. The school does not convey an understanding of the flexibility independent schools have to develop an ambitious curriculum suitable for its specific context. Beyond assertions and signposting training for staff, the school did not present a convincing explanation of how the proposed academic curriculum would be coupled with what the proprietor describes as a 'therapeutic approach'.
- The proprietor has not ensured that the standard in this part is likely to be met.

Schedule 10 of the Equality Act 2010

- The proprietor has written a suitable plan that aims to improve accessibility to the proposed school. This includes actions to promote easier access to the premises, information and the curriculum, as required by the Equality Act 2010.

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	151692
DfE registration number	887/6016
Inspection number	10393748

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	Other independent special school
School status	Independent day school
Proprietor	Our Rock Group Limited
Chair	Emmanuel Olumayowa Ajayi
Headteacher	Greg Higson
Annual fees (day pupils)	£40,000 to £80,000
Telephone number	0744 934 4373
Website	None
Email address	office@ourrockacademy.co.uk
Date of previous standard inspection	Not previously inspected

Pupils

	School's current position	School's proposal	Inspector's recommendation
Age range of pupils	Not applicable	11 to 16	Not applicable
Number of pupils on the school roll	Not applicable	19	Not applicable

Pupils

	School's current position	School's proposal
Gender of pupils	Not applicable	Mixed
Number of full-time pupils of compulsory school age	Not applicable	19
Number of part-time pupils	Not applicable	0
Number of pupils with special educational needs and/or disabilities	Not applicable	19
Of which, number of pupils with an education, health and care plan	Not applicable	19
Of which, number of pupils paid for by a local authority with an education, health and care plan	Not applicable	19

Staff

	School's current position	School's proposal
Number of full-time equivalent teaching staff	Not applicable	6
Number of part-time teaching staff	Not applicable	0

Information about this proposed school

- The proposed school is located at The Old St Justus Church, Clifton Close, Rochester ME2 2HG. It is on the site of a previous independent special school that was run by a different proprietor. A registered nursery and pre-school share the site. This is not connected with the proprietor of the proposed school.
- The proprietor runs other care provision but does not have previous experience of running schools.
- The proprietor anticipates that most pupils will have an EHC plan and be placed by the local authority. The school proposes to cater predominantly for pupils with SEMH difficulties or a diagnosis of autism. Pupils may also have the following need types: cognitive and learning needs; speech, language and communication difficulties and moderate learning difficulties.
- The school does not intend to use alternative provision.

Information about this inspection

- The inspection was commissioned by the Department for Education to determine whether the proposed school is likely to meet the standards if it is given the permission to open. This was the school's second pre-registration inspection, having had one under a previous application.
- Before and during the onsite visit, inspectors scrutinised a wide range of policies, documents and records presented by the proprietor as evidence of the school's likelihood to meet the standards.
- The headteacher was not present during the onsite inspection. Inspectors held discussions with the chair of the proprietor body and the operations manager. They also toured the premises. Inspectors spoke with the headteacher remotely.

Inspection team

Clive Dunn, lead inspector

His Majesty's Inspector

Marian Feeley

His 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

- 2(1) The standard in this paragraph is met if-
 - 2(1)(a) 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
 - 2(1)(b) the written policy, plans and schemes of work-
 - 2(1)(b)(i) take into account the ages, aptitudes and needs of all pupils, including those pupils with an EHC plan; and

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.
- 16 The standard in this paragraph is met if the proprietor ensures that-
 - 16(a) 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
 - 16(b) appropriate action is taken to reduce risks that are identified.

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

- 18(2) The standard in this paragraph is met if-
 - 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)(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
 - and in the light of the information from the checks referred to in paragraphs (c) to (f) the proprietor considers that the person is suitable for the position to which the person is appointed.
- 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)(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)(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;
- and, where an enhanced criminal record check is made, the Chair obtains an enhanced criminal record certificate relating to the individual; and
- 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(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)(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)(viii) checks were made pursuant to paragraph 18(2)(e),

Part 6. Provision of information

- 32(1) The standard about the provision of information by the school is met if the proprietor ensures that-
 - 32(1)(b) the information specified in sub-paragraph (3) is made available to parents of pupils and parents of prospective pupils and, on request, to the Chief Inspector, the Secretary of State or an independent inspectorate;
- 32(3) The information specified in this sub-paragraph is-
 - 32(3)(b) particulars of educational and welfare provision for pupils with EHC plans and pupils for whom English is an additional language;

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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