

BRITISH ACCREDITATION COUNCIL INSPECTION REPORT

Short Course Provider (SCP) Reaccreditation Inspection

ORGANISATION: Wise Owl English Language

ADDRESS: 12 Elaine Avenue
Rochester
Kent
ME2 2YW

HEAD OF ORGANISATION: Mr Phil Monfor

DATE OF INSPECTION: 27-28 July 2017

ACCREDITATION STATUS AT INSPECTION: Accredited

DECISION ON ACCREDITATION:

- Reaccreditation awarded for the full four-year period.
- Decision on accreditation deferred.
- Accreditation to be withdrawn.

Date: 19 October 2017

PART A - INTRODUCTION

1. Background to the organisation

Wise Owl English Language Limited (Wise Owl/the Provider) was incorporated as a private limited company in July 2012. The current head of Wise Owl has been a director of the company for five years and is currently the sole company director. The Director is supported by a Director of Studies, who has oversight of teaching and learning.

Wise Owl was established with the objective of running junior English as a Foreign Language (EFL) summer schools.

Wise Owl changed the location for its 2014 summer school to Moffats School, Kinlet Hall in Shropshire. This is the current teaching venue. It is an English independent school during term time. Kinlet Hall offers teaching rooms, accommodation and spacious grounds for activities.

2. Brief description of the current provision

The Provider offers a programme which includes four weeks of intensive EFL teaching coupled with a variety of sporting and creative activities and excursions. The programme is aimed at participants who are aged 7 to 14 years. Course duration is of one to four weeks. The courses have a strong academic focus with 25 hours per week of EFL tuition.

The teaching is in classes that are arranged by English language ability. Class sizes are capped at 12 participants. Participants are tested every week and a report is made available to their parents. Participants receive an end of course certificate. All teaching, accommodation, meals, activities, excursions and transfers are included in the cost of the courses.

The Provider has grown its provision from seven students to the present 61 enrolments. Approximately half the current participants are from Europe and half from the rest of the world including a minority from China.

3. Inspection process

The re-accreditation inspection was carried out over two full days by one inspector. Four observations of teaching and learning and one observation of the afternoon activities took place. The inspector held discussions with the Director, the Director of Studies, boarding and activities staff, teaching staff and participants. The inspector scrutinised documentation, both electronic and in hard copy. Additional relevant documentation was made available on request. The Provider fully cooperated with the inspection process.

4. Inspection history:

Inspection type	Date
Stage 2	4 April 2013
Stage 3	29 July 2013
Interim	31 July 2014

PART B - JUDGEMENT AND EVIDENCE

The following judgements and comments are based upon evidence seen by the inspector(s) during the inspection and from documentation provided by the provider.

INSPECTION AREA - MANAGEMENT, STAFFING AND ADMINISTRATION

1. The provider is effectively managed

- | | | |
|-----|---|---|
| 1.1 | The management structure is clearly defined, documented and understood, including the role and extent of authority of any owners, trustees or governing body. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 1.2 | The head of the provider and other senior managers are suitably qualified and experienced, understand their specific responsibilities and are effective in carrying them out. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 1.3 | There are clear channels of communication between the management and staff and those working at the delivery venue/s. | <input checked="" type="radio"/> Yes <input type="radio"/> No |

This standard is judged to be: Met Partially Met Not Met

Comments

The Provider is managed by a small team of qualified staff, who are effective in running the summer school.

The Director is an on-site member of the team and has good oversight of all aspects of the summer school.

2. The administration of the provider is effective

- | | | |
|-----|---|---|
| 2.1 | Administrators are suitably qualified or experienced and understand their specific responsibilities and duties. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2.2 | The size of the administrative team is sufficient to ensure the effective day-to-day running of the provider. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2.3 | The administrative support available to the management is clearly defined, documented and understood. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2.4 | Policies, procedures and systems are well documented and effectively disseminated across the provider. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2.5 | Data collection and collation systems are effective. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2.6 | Administrative offices are adequate in size and resources for the effective administration of the provider. | <input checked="" type="radio"/> Yes <input type="radio"/> No |

This standard is judged to be: Met Partially Met Not Met

Comments

The Director effectively manages and administers the summer school. The Director is appropriately supported by the Director of Studies who has oversight of teaching and learning. This allows the pastoral and teaching staff to fully engage with the participants.

Appropriate administrative policies and procedures are well documented and clear. Amendments made to policy documents are not tracked making it difficult to identify changes and when they have been made.

3. **The provider employs appropriate managerial and administrative staff**

- 3.1 There are appropriate policies and effective procedures for the recruitment and continuing employment of suitably qualified and experienced staff. Yes No
- 3.2 Experience and qualifications claimed are verified before employment. Yes No
- 3.3 There is an effective system for regularly reviewing the performance of staff. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Staff performance throughout the summer school is monitored by the Director of Studies who identifies areas and associated actions for improvements.

4. **Publicity material, both printed and electronic, gives a comprehensive, up-to-date and accurate description of the provider and its programmes**

- 4.1 Text and images provide an accurate depiction of the provider's location, premises, facilities and the range and nature of resources and services offered. Yes No
- 4.2 Information on the courses available is comprehensive, accurate and up to date. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

The website contains accurate information and is easy to navigate and that information is easily accessible.

The online prospectus is available in six languages, which means that it is easily accessible to participants from a variety of countries.

5. **The provider takes reasonable care to recruit and enrol suitable participants for its courses**

- 5.1 Entry requirements for each course, including those relating to language ability, are set at an appropriate level and clearly stated in the course descriptions seen by prospective participants. Yes No NA
- 5.2 A formal application process ensures that participants meet the entry requirements and any claimed qualifications are verified. Yes No NA
- 5.3 The provider replies to all application enquiries promptly and appropriately and briefs all stakeholders properly on the nature and requirements of its programmes. Yes No NA
- 5.4 Any overseas recruitment agents are properly selected, briefed, monitored and evaluated. Yes No NA

This standard is judged to be: Met Partially Met Not Met

Comments

The level of English language ability of all applicants is assessed prior to acceptance onto a course to ensure that participants will benefit from the summer school.

6. **There is an appropriate policy on participant attendance and effective procedures and systems to enforce it**

- 6.1 There is a clear and published policy on participant attendance and punctuality. Yes No
- 6.2 Accurate and secure records of attendance and punctuality at each session are kept for all participants, collated centrally and reviewed. Yes No NA
- 6.3 Participant absences are followed up promptly and appropriate action taken. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Attendance registers are taken for each class, activity and excursion.

Attendance is carefully monitored by the pastoral staff and absences are followed up as a priority.

7. **The provider regularly obtains and records feedback from participants and other stakeholders and takes appropriate action where necessary**

- 7.1 The provider has effective mechanisms for obtaining feedback from participants and other stakeholders (such as staff, partner providers and employers) on all aspects of the provider's provision, including formal participant representation where appropriate. Yes No
- 7.2 Feedback is obtained, recorded and analysed on a regular basis. Yes No
- 7.3 The feedback is reviewed by management and action is taken where necessary. Yes No
- 7.4 There is a mechanism for reporting on the provider's response to the feedback to the participant body. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Feedback is obtained informally and appropriately taken into account in course planning. Participants on one week courses are not asked for feedback early in the course, which would allow the Provider to identify and resolve any areas of concern at the earliest opportunity.

7.4 This key indicator is not applicable as the short duration of the summer school and the age of the participants makes reporting to participants impracticable.

8. **The provider has effective systems to review its own standards and assess its own performance with a view to continuing improvement**

- 8.1 There are effective systems for monitoring and periodically reviewing all aspects of the provider's performance. Yes No
- 8.2 Reports are compiled which present the results of the provider's reviews and incorporate action plans. Yes No
- 8.3 Action plans are implemented and regularly reviewed. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Overall performance is reviewed by senior staff at the end of each summer school.

8.2 8.3 There is no formal reporting, action planning or documentary evidence of the review process.

INSPECTION AREA - TEACHING, LEARNING AND ASSESSMENT

9. Programme management is effective

- | | | | |
|-----|--|--------------------------------------|--------------------------|
| 9.1 | There is a suitably qualified and experienced programme manager or management team with responsibility for teaching, learning and assessment and the management of the body of trainers. | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 9.2 | Classes are timetabled and rooms allocated appropriately for the courses offered. | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 9.3 | The allocation of trainers to classes provides for a consistent learning experience and delivery is monitored to ensure consistency. | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 9.4 | There is an appropriate policy and effective procedures for the acquisition of teaching and learning resources. | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

This standard is judged to be: Met Partially Met Not Met

Comments

The Director of Studies ensures that classes are adequately timetabled and rooms allocated appropriately.

The Director of Studies is responsible for ensuring the quality of the participants' academic experience and has instigated a series of lesson observations, including peer observations, to ensure the participants have a consistent experience.

10. The courses are planned and delivered in ways that enable participants to succeed

- | | | | | |
|------|---|--------------------------------------|-------------------------------------|-------------------------------------|
| 10.1 | Courses are designed and delivered in ways that allow participants to develop the knowledge and skills which will be required for final examinations or assessments or which meet stakeholders' requirements. | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |
| 10.2 | Lessons and assessments maintain an appropriate focus on any assessment objectives or statement of learning outcomes established by the awarding body. | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |
| 10.3 | Formative assessments appropriately reflect the nature and standards of summative examinations. | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |
| 10.4 | Participants are encouraged and enabled to develop independent learning skills. | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 10.5 | The academic backgrounds and particular needs of participants are taken into account in the classroom delivery of the course. | <input type="radio"/> Yes | <input checked="" type="radio"/> No | |

This standard is judged to be: Met Partially Met Not Met

Comments

10.5 In some lessons, participants are insufficiently challenged by the allocated tasks.

11. **Trainers are suitable for the courses to which they are allocated and effective in delivering them**

- 11.1 Trainers are appropriately qualified and experienced. Yes No
- 11.2 Trainers have a level of subject knowledge, pedagogic and communicative skill which allows them to deliver the content of courses effectively. Yes No
- 11.3 The appraisal procedures for trainers incorporate regular classroom observation. Yes No
- 11.4 Trainers are supported in their continuing professional development and enabled to develop further pedagogic techniques to enhance the learning of participants. Yes No
- 11.5 Trainers respond to different learning needs of participants where appropriate, taking various learning styles into account in their planning and delivery of lessons. Yes No
- 11.6 Trainers employ effective strategies to involve all participants in active participation and to check their understanding of concepts and course content. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Well qualified and experienced teaching staff effectively meet the needs of the participants in their class.

The participants commented on how much they liked the lessons and how good the teachers are.

All participants are encouraged to contribute in classes and support was available for those students who, for example, needed assistance with their written skills.

12. **The provider provides participants and trainers with access to appropriate resources and materials for study**

This standard is judged to be: Met Partially Met Not Met

Comments

Course texts and the associated teacher handbooks are appropriate and readily available.

13. **Participants receive appropriate assessment and feedback on their performance and progress, which are effectively monitored**

- 13.1 Feedback is given to individual participants tailored to meet their specific needs and constructive in its nature and delivery. Yes No
- 13.2 Courses are planned to include a schedule of assessments, the procedures and criteria for which are available in writing and in advance to participants and trainers. Yes No NA
- 13.3 Assessment outcomes are monitored to enable the identification of participants who are not making satisfactory progress and prompt intervention where appropriate. Yes No NA
- 13.4 Participants are made aware of how their progress relates to their targeted level of achievement. Yes No NA
- 13.5 Additional support or advice on alternative courses is provided to participants who are judged not to be making sufficient progress to succeed. Yes No NA
- 13.6 Participants have appropriate access to trainers outside class time. Yes No NA

This standard is judged to be: Met Partially Met Not Met

Comments

Participants take a weekly test in order to assess their progress.

Each teacher records and tracks the progress of participants in their class.

Participants are informed of their progress, as are their parents and additional support is put in place if required.

14. **The provider offers courses leading to accredited awards granted by recognised awarding bodies wherever appropriate**

This standard is judged to be: Met Partially Met Not Met NA

Comments

15. **There is a clear rationale for courses leading to unaccredited or internal awards**

- 15.1 There is a clear statement of the level claimed relative to the NQF/QCF and evidence that participants who receive the award meet the stated requirements for that level. Yes No NA
- 15.2 There is evidence of the extent to which the awards are accepted for the purposes of employment or further study. Yes No NA
- 15.3 External moderators are involved in the assessment process where appropriate. Yes No NA

This standard is judged to be: Met Partially Met Not Met NA

Comments

16. **There are satisfactory procedures for the administration of examinations and other means of assessment**

- 16.1 The provider complies with the requirements of the relevant awarding bodies in terms of examination security and administration where appropriate. Yes No NA
- 16.2 For internal assessment and awards, there are effective systems in place for examination security and administration, and clear procedures for participants to appeal against their marks. Yes No NA

This standard is judged to be: Met Partially Met Not Met NA

Comments

INSPECTION AREA - PARTICIPANT WELFARE

17. **Participants receive pastoral support appropriate to their age, background and circumstances**

- 17.1 There is at least one named staff member responsible for participant welfare who is suitably trained, accessible to all participants and available to provide advice. Yes No NA
- 17.2 Participants receive appropriate advice before the start of the programme. Yes No
- 17.3 Participants receive an appropriate induction and relevant information at the start of the programme. Yes No
- 17.4 Participants are issued with a contact number for out-of-hours and emergency support. Yes No NA
- 17.5 The provider has policies in place to avoid discrimination and a published procedure for dealing with any abusive behaviour. Yes No
- 17.6 Effective safeguarding arrangements are in place and are regularly reviewed to keep all participants safe. Yes No NA
- 17.7 Effective arrangements are in place to protect participants from the risks associated with radicalisation and extremism. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Standards of participant welfare are high.

The pastoral staff live on-site and are accessible to participants at all times.

17.4 is not applicable as participants are supervised at all times.

The Director is the safeguarding lead and all the required safeguarding arrangements and associated documentation is in place.

All participants interviewed said they feel safe and secure. They know who they can contact at any time, especially at night, if, for example, they feel unwell.

Many participants stay for the full four weeks of the summer school and many attend the summer school each year until they turn 15, often returning with friends, siblings or both. This is a measure of parents' confidence in the summer school as a safe environment for their children.

18. **International participants are provided with specific advice and assistance**

- | | | |
|------|--|---|
| 18.1 | International participants receive appropriate advice before their arrival on travelling to and staying in the UK. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 18.2 | International participants receive an appropriate induction upon arrival covering issues specific to the local area. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 18.3 | Information and advice specific to international participants continues to be available throughout the course of study. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 18.4 | Provision of support takes into account cultural and religious considerations. Where possible, participants have access to speakers of their own first language. | <input checked="" type="radio"/> Yes <input type="radio"/> No |

This standard is judged to be: Met Partially Met Not Met NA

Comments

As an English language school participants are expected to converse in English at all times so they can practice their English in an informal setting.

Participants confirm that speaking English is an important part of making new friends and effectively enhances their enjoyment of the course.

19. **The fair treatment of participants is ensured**

- | | | |
|------|---|---|
| 19.1 | Participants apply for and are enrolled on courses under fair and transparent contractual terms and conditions. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 19.2 | Participants have access to a fair complaints procedure of which they are informed in writing at the start of the course. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 19.3 | Participants are advised of BAC's own complaints procedures. | <input checked="" type="radio"/> Yes <input type="radio"/> No |

This standard is judged to be: Met Partially Met Not Met

Comments

Enrolment and complaints procedures are effective and appropriate.

20. **Where residential accommodation is offered, it is fit for purpose, well maintained and appropriately supervised**

- 20.1 Any residential accommodation is clean, safe and of a standard which is adequate to the needs of participants. Yes No
- 20.2 Any residential accommodation is open to inspection by the appropriate authorities, including Ofsted where participants under 18 are accommodated. Yes No NA
- 20.3 Clear rules and fire, health and safety procedures are in place, with appropriate precautions taken for security of participants and their property. Yes No
- 20.4 A level of supervision is provided appropriate to the needs of participants. Yes No
- 20.5 Separate accommodation blocks are provided for participants under 18. Yes No NA

This standard is judged to be: Met Partially Met Not Met NA

Comments

The residential accommodation consists of the dormitories belonging to the school that occupies the building during term time. Participants are very happy with the accommodation, which meets their needs in terms of comfort and access to facilities.

Boys and girls are accommodated on separate floors. Each has two members of the pastoral staff on the same floor.

Small dormitories of three or four allow participants to be further grouped by age.

21. **Where home-stay accommodation is organised, the welfare of participants is ensured and the provider's relationship with hosts is properly managed**

- 21.1 Due care is taken in selecting home-stay accommodation which both provides a safe and comfortable living environment for participants and is appropriately located for travel to the provider and back. Yes No
- 21.2 Any home-stay accommodation is inspected before participants are placed and is subject to regular re-inspection by a responsible representative or agent of the provider. Yes No
- 21.3 The provider has appropriate contracts in place with any hosts, clearly setting out the rules, terms and conditions of the provision. Yes No
- 21.4 Appropriate advice and support is given to both hosts and participants before and during the placement. Yes No
- 21.5 Clear monitoring procedures are in place with opportunities for participant feedback and prompt action taken in the event of problems. Yes No

This standard is judged to be: Met Partially Met Not Met NA

Comments

22. **The provider provides an appropriate social programme for participants and information on leisure activities in the area**

- 22.1 Participants are provided with appropriate information on opportunities for participation at events and other leisure activities which may be of interest. Yes No
- 22.2 The social programme is responsive to the needs and wishes of participants. Yes No NA
- 22.3 Any activities within the social programme have been chosen with consideration for their affordability by the majority of participants. Yes No NA
- 22.4 Any activities organised by the provider are supervised by a responsible representative with suitable qualifications and experience. Yes No NA

This standard is judged to be: Met Partially Met Not Met NA

Comments

Interesting trips are organised. Harry Potter World and the Black Country Museum are particularly popular.

Every afternoon, except on trip days, a number of activities are offered from which participants can choose. Activities include tennis, art and swimming, supervised by experienced staff.

INSPECTION AREA - PREMISES AND FACILITIES

23. **The provider has secure possession of and access to its premises**

- 23.1 The provider has secure tenure on its premises. Yes No NA
- 23.2 Where required, the provider has access to suitable external premises for training purposes of a temporary or occasional nature. Yes No NA

This standard is judged to be: Met Partially Met Not Met

Comments

24. **The premises provide a safe, secure and clean environment for participants and staff**

- 24.1 Access to the premises is appropriately restricted and secured. Yes No
- 24.2 The premises are maintained in an adequate state of repair, decoration and cleanliness. Yes No
- 24.3 There are specific safety rules in areas of particular hazard (e.g. science laboratories), made readily available to participants, staff and visitors. Yes No NA
- 24.4 General guidance on health and safety is made available to participants, staff and visitors. Yes No
- 24.5 There is adequate signage inside and outside of the premises and notice boards for the display of general information. Yes No
- 24.6 There is adequate circulation space for the number of participants and staff accommodated, and a suitable area in which to receive visitors. Yes No
- 24.7 There are toilet facilities of an appropriate number and level of cleanliness. Yes No
- 24.8 There is adequate heating and ventilation in all rooms. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Notices are clearly displayed detailing appropriate health and safety information. There is good clear signage directing participants and visitors to various locations such as the main office.

The summer school building stands in its own grounds that are a good distance from the main road with access to the estate by private drive, signed from the main road. Thus the location is safe and secure.

No information on provision for participants with disabilities is available.

25. **Training rooms and other learning areas are appropriate for the courses offered**

- 25.1 Training rooms and other learning areas provide adequate accommodation in size and number for the classes allocated to them. Yes No
- 25.2 Training rooms and any specialised learning areas (e.g. laboratories, workshops, studios) are equipped to a level which allows for the effective delivery of each course. Yes No NA
- 25.3 There are facilities suitable for conducting the assessments required on each course. Yes No NA

This standard is judged to be: Met Partially Met Not Met

Comments

The Provider uses the term time school's very good facilities, for example the classrooms, tennis courts and the performing arts hall.

26. **There are appropriate additional facilities for participants and staff**

- 26.1 Participants have access to sufficient space and suitable facilities for private study, including library and IT resources. Yes No NA
- 26.2 Trainers have access to sufficient personal space for preparing lessons, marking work and relaxation. Yes No NA
- 26.3 Participants and staff have access to space and facilities suitable for relaxation and the consumption of food and drink where appropriate. Yes No NA
- 26.4 Participants and staff have access to storage for personal possessions where appropriate. Yes No NA
- 26.5 There are individual offices or rooms in which trainers and senior management can hold private meetings and a room of sufficient size to hold staff meetings. Yes No

This standard is judged to be: Met Partially Met Not Met

Comments

Participants have access to the school library, Information Technology facilities and relaxation areas.

There are many comfortable rooms available for staff.

This makes for a pleasant environment for participants and staff.

COMPLIANCE WITH STATUTORY REQUIREMENTS

Declaration of compliance has been signed and dated. Yes No

PART C - SUMMARY OF STRENGTHS AND ACTION POINTS

Numbering of action points aligns with that of the minimum standards

MANAGEMENT, STAFFING AND ADMINISTRATION

Provider's strengths

The Director effectively manages all the operational aspects of the summer school allowing temporary staff to concentrate on high quality teaching, learning and activities.

Actions required	Priority H/M/L
8.2 8.3 The Director must formalise the annual review and action planning process to include input from participant, staff and parental feedback. This will ensure the Provider is responsive to the needs of the stakeholders.	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low

TEACHING, LEARNING AND ASSESSMENT

Provider's strengths

Well qualified and committed summer school teaching staff ensure that the academic needs of participants are met and that each participant has a successful summer school experience.

Actions required	Priority H/M/L
10.5 The Provider must ensure that participants are allocated to the class best suited to their needs, to ensure appropriate stretch and challenge for all participants.	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low

PARTICIPANT WELFARE

Provider's strengths

Participants are well looked after by a dedicated on-site boarding and activities team.

Actions required	Priority H/M/L
None	<input type="radio"/> High <input type="radio"/> Medium <input type="radio"/> Low

PREMISES AND FACILITIES

Provider's strengths

The excellent facilities provided are those of a grade one listed building and the school that occupies the building during term time.

Teaching rooms, dormitories, activity areas, dining rooms are all suitable for the Provider's summer school.

Actions required	Priority H/M/L
None	<input type="radio"/> High <input type="radio"/> Medium <input type="radio"/> Low

RECOMMENDED AREAS FOR QUALITY IMPROVEMENT

The Provider should ensure version effective control of documentation so that evidence of review and updates is available.

The Provider should obtain feedback from all participants early in the course so that any identified actions can be taken quickly and improvements made.

The Provider should include information on provision for participants with disabilities in its documentation and publicity materials.

COMPLIANCE WITH STATUTORY REQUIREMENTS