



Teaching
Regulation
Agency

Mr Rory Thorndyke: Professional conduct panel meeting outcome

**Panel decision and reasons on behalf of the
Secretary of State for Education**

November 2022

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Professional conduct panel decision and recommendations, and decision on behalf of the Secretary of State

Teacher: Mr Rory Thorndyke

Teacher ref number: 1154466

Teacher date of birth: 2 June 1986

TRA reference: 19268

Date of determination: 17 November 2022

Former employer: Palmer Catholic Academy, Ilford

Introduction

A professional conduct panel ('the panel') of the Teaching Regulation Agency ('the TRA') convened on 17 November 2022 by way of a virtual meeting, to consider the case of Mr Rory Thorndyke.

The panel members were Mr Clive Sentance (teacher panellist – in the chair), Mrs Patricia Hunt (former teacher panellist) and Mrs Shabana Robertson (lay panellist).

The legal adviser to the panel was Mrs Rebecca Utton of Birketts LLP solicitors.

In advance of the meeting, after taking into consideration the public interest and the interests of justice, the TRA agreed to a request from Mr Thorndyke that the allegations be considered without a hearing. Mr Thorndyke provided a signed statement of agreed facts and admitted conviction of a relevant offence. The panel considered the case at a meeting without the attendance of the presenting officer, Ms Charlotte Blackburn of Capsticks solicitors LLP, Mr Thorndyke or any representative for Mr Thorndyke.

The meeting took place in private by way of a virtual meeting.

Allegations

The panel considered the allegations set out in the notice of meeting dated 28 October 2022.

It was alleged that Mr Thorndyke was guilty of having been convicted of a relevant offence, in that he was convicted at Snaresbrook Crown Court of the following relevant offences:

- 1) Two counts of offender 18 or over engage in non-penetrative sexual activity with girl 13 to 15, contrary to the sexual offences Act 2003;
- 2) Two counts of offender 18 or over engage in penetrative sexual activity with a girl 13 to 15, contrary to the sexual offences Act 2003;
- 3) Four counts of adult abuse of position of trust - sexual activity with a girl 13-17 cared for in section 21 premises, contrary to the Sexual Offences Act 2003; and
- 4) Two counts of possess an indecent photograph / pseudo-photograph of a child.

Mr Thorndyke admitted the facts of allegations 1, 2, 3 and 4 and that his behaviour amounted to a conviction of a relevant offence falling short of the standards of behaviour expected of a teacher, as set out in the statement of agreed facts signed by Mr Thorndyke on 12 June 2022.

Preliminary applications

There were no preliminary applications.

The panel noted that since the date of the referral to the TRA in this case, new 'Teacher misconduct: Disciplinary procedures for the teaching profession' were published in May 2020 (the 'May 2020 Procedures'). The panel understands that the earlier provisions contained within the 'Teacher misconduct: disciplinary procedures for the teaching profession' updated in April 2018 (the 'April 2018 Procedures') apply to this case, given that those provisions applied when the referral was made. Although the panel has the power to direct that the May 2020 Procedures should apply in the interests of justice or the public interest, the panel had received no representations that this should be the case. For the avoidance of doubt, therefore, the panel confirms that it has applied the April 2018 Procedures in this case.

Summary of evidence

Documents

In advance of the meeting, the panel received a bundle of documents which included:

- Section 1: Chronology, anonymised pupil list and list of key people – pages 3 to 5
- Section 2: Notice of referral, response and notice of meeting – pages 6 to 19
- Section 3: Statement of agreed facts and presenting officer representations – pages 20 to 26
- Section 4: TRA documents – pages 27 to 61
- Section 5: Correspondence with teacher – pages 62 to 68

The panel members confirmed that they had read all of the documents within the bundle, in advance of the meeting.

Statement of agreed facts

The panel considered a statement of agreed facts which was signed by Mr Thorndyke on 12 June 2022, and subsequently signed by the presenting officer on 27 June 2022.

Decision and reasons

The panel carefully considered the case and reached the following decision and reasons:

In advance of the meeting, the TRA agreed to a request from Mr Thorndyke for the allegations to be considered without a hearing. The panel had the ability to direct that the case be considered at a hearing if required in the interests of justice or in the public interest. The panel did not determine that such a direction was necessary or appropriate in this case.

Mr Thorndyke commenced employment as a teacher at the Palmer Catholic Academy ('the School') on 2 July 2012. Mr Thorndyke was dismissed from his role at the School on 7 December 2018.

On 17 March 2020, the LADO referred Mr Thorndyke to the TRA.

On 16 October 2021, Mr Thorndyke was convicted at Snaresbrook Crown Court of 10 offences relating to his conduct with Pupil A.

Mr Thorndyke was sentenced on 5 January 2021, at Snaresbrook Crown Court, to a prison sentence of 54 months. In addition, he was entered on the Sex Offenders Register

indefinitely, made subject to a Sexual Harm Prevention Order for 10 years, a Restraining Order for 5 years and ordered to pay a £170 Victim Surcharge.

Findings of fact

The findings of fact are as follows:

The panel found the following particulars of the allegations against you proved, for these reasons:

- 1) Two counts of offender 18 or over engage in non-penetrative sexual activity with girl 13 to 15, contrary to the sexual offences Act 2003;**
- 2) Two counts of offender 18 or over engage in penetrative sexual activity with a girl 13 to 15, contrary to the sexual offences Act 2003;**
- 3) Four counts of adult abuse of position of trust - sexual activity with a girl 13-17 cared for in section 21 premises, contrary to the Sexual Offences Act 2003; and**
- 4) Two counts of possess an indecent photograph / pseudo-photograph of a child.**

The panel considered the statement of agreed facts signed by Mr Thorndyke on 12 June 2022. In that statement of agreed facts, Mr Thorndyke admitted the particulars of allegations 1, 2, 3 and 4. Further, it was admitted the facts of the allegations amounted to a conviction of a relevant offence.

The panel noted page 8 of the Teacher misconduct: The prohibition of teachers ('the Advice') which states that where there has been a conviction at any time, of a criminal offence, the panel will accept the certificate of conviction as conclusive proof of both the conviction and the facts necessarily implied by the conviction, unless exceptional circumstances apply. The panel did not find that any exceptional circumstances applied in this case.

The panel had been provided with a copy of the certificate of conviction from Snaresbrook Crown Court, which detailed that Mr Thorndyke had been convicted of 10 offences relating to his conduct with Pupil A. This included:

- Two counts of offender 18 or over engage in non-penetrative sexual activity with girl 13 to 15, contrary to the Sexual Offences Act 2003;
- Two counts of offender 18 or over engage in penetrative sexual activity with a girl 13 to 15, contrary to the Sexual Offences Act 2003;
- Four counts of adult abuse of position of trust – sexual activity with a girl 13-17 cared for in section 21 premises, contrary to the Sexual Offences Act 2003; and
- Two counts of possess an indecent photograph / pseudo-photograph of a child.

In respect of the allegations, Mr Thorndyke was sentenced at Snaresbrook Crown Court on 5 January 2021 to a prison sentence of 54 months. In addition, he was entered on the Sex Offenders Register indefinitely, made subject to a Sexual Harm Prevention Order for 10 years and a Restraining Order for 5 years and ordered to pay a £170 Victim Surcharge.

On examination of the documents before the panel, the panel was satisfied that the facts of the allegations were proven.

Findings as to conviction of a relevant offence

Having found the allegations proved, the panel went on to consider whether the facts of those proved allegations amounted to conviction of a relevant offence.

In doing so, the panel had regard to the Advice.

The panel was satisfied that the conduct of Mr Thorndyke, in relation to the facts it found proved, involved breaches of the Teachers' Standards. The panel considered that by reference to Part 2, Mr Thorndyke was in breach of the following standards:

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by
 - Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
 - having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
 - showing tolerance of and respect for the rights of others
- Teachers must have proper and professional regard for the ethos, policies and practices of the school in which they teach;
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel considered Mr Thorndyke's conduct to be of the utmost seriousness and extremely grave. His behaviour was completely incompatible with the standards and behaviour expected of any member of the public, let alone a teacher who is placed in the position of trust with children.

The panel noted that whilst much of Mr Thorndyke's conduct took place outside of the education setting, all of his behaviour involved Pupil A, who was one of his pupils. Given the severity of his actions, which included breach of a position of trust not only in respect

of Pupil A but also Pupil A's family, elements of grooming and the forming of an inappropriate sexual relationship with a child, the panel were in no doubt that Mr Thorndyke's conduct was highly relevant to his profession as a teacher and to teaching, working with children and/or working in an education setting.

The panel noted that the behaviour involved in committing the offences could have had an impact on the safety or security of pupils and/or members of the public. The panel considered the impact and risk to safety and security to be greater in Mr Thorndyke's case given he was a music teacher as this role relied upon him being in close proximity with pupils often on a one to one basis.

The panel were particularly concerned that Mr Thorndyke had not heeded several warnings he had been given about his behaviour. The panel noted that not only did his conduct continue following the receipt of these warnings, it escalated to include more serious and penetrative sexual activity with Pupil A together with acts of dishonesty and concealment.

The panel also took account of the way the teaching profession is viewed by others. The panel considered that Mr Thorndyke's behaviour in committing the offences could affect public confidence in the teaching profession, given the influence that teachers may have on pupils, parents and others in the community.

The panel noted that Mr Thorndyke's behaviour ultimately led to a sentence of imprisonment of significant length. This was indicative of the seriousness of the offences committed.

The panel regarded this case as extremely serious given that it involved multiple offences of sexual activity; sexual communication with a child; and any activity involving viewing, taking, making, possessing, distributing or publishing any indecent photograph or image or indecent pseudo photograph or image of a child, or permitting any such activity, including one-off incidents, which the Advice states are more likely to be considered relevant offences.

The panel also found that the seriousness of the offending behaviour that led to the conviction was relevant to Mr Thorndyke's ongoing suitability to teach. The panel considered that a finding that these convictions were for relevant offences was necessary to reaffirm clear standards of conduct so as to maintain public confidence in the teaching profession.

Accordingly, the panel was satisfied that Mr Thorndyke's convictions amount to a conviction, at any time, of a relevant offence.

Panel's recommendation to the Secretary of State

Given the panel's findings in respect of a conviction of a relevant offence, it was necessary for the panel to go on to consider whether it would be appropriate to recommend the imposition of a prohibition order by the Secretary of State.

In considering whether to recommend to the Secretary of State that a prohibition order should be made, the panel had to consider whether it would be an appropriate and proportionate measure, and whether it would be in the public interest to do so. Prohibition orders should not be given in order to be punitive, or to show that blame has been apportioned, although they are likely to have punitive effect.

The panel had regard to the particular public interest considerations set out in the Advice and, having done so, found a number of them to be relevant in this case, namely: the safeguarding and wellbeing of pupils and the protection of other members of the public; the maintenance of public confidence in the profession; and declaring and upholding proper standards of conduct.

In the light of the panel's findings against Mr Thorndyke, which consisted of convictions for 10 offences relating to his conduct with Pupil A, involving penetrative sexual activity with a girl 13 to 15, adult abuse of a position of trust and possessing an indecent photograph / pseudo photograph of a child, there was an exceptionally strong public interest consideration in respect of the protection of pupils.

Similarly, the panel considered that public confidence in the profession could be seriously weakened if conduct such as that found against Mr Thorndyke was not treated with the utmost seriousness when regulating the conduct of the profession.

The panel decided that a strong public interest consideration in declaring proper standards of conduct in the profession was also present as the conduct found against Mr Thorndyke was outside that which could reasonably be tolerated.

Notwithstanding the clear public interest considerations that were present, the panel considered carefully whether or not it would be proportionate to impose a prohibition order, taking into account the effect that this would have on Mr Thorndyke.

In carrying out the balancing exercise, the panel had regard to the public interest considerations both in favour of, and against, prohibition as well as the interests of Mr Thorndyke. The panel took further account of the Advice, which suggests that a prohibition order may be appropriate if certain behaviours of a teacher have been proved. In the list of such behaviours, those that are relevant in this case are:

- serious departure from the personal and professional conduct elements of the Teachers' Standards;

- the commission of a serious criminal offence, including those that resulted in a conviction or caution, paying particular attention to offences that are 'relevant matters' for the purposes of The Police Act 1997 and criminal record disclosures;
- misconduct seriously affecting the education and/or well-being of pupils, and particularly where there is a continuing risk;
- abuse of position or trust (particularly involving pupils);
- any abuse of any trust, knowledge or influence gained through their professional position in order to advance a romantic or sexual relationship with a pupil or former pupil;
- sexual misconduct, for example, involving actions that were sexually motivated or of a sexual nature and/or that use or exploit the trust, knowledge or influence derived from the individual's professional position;
- any activity involving viewing, taking, making, possessing, distributing or publishing any indecent photograph or image or pseudo photograph or image of a child, or permitting such activity, including one-off incidents;
- failure in their duty of care towards a child, including exposing a child to risk or failing to promote the safety and welfare of the children (as set out in Part 1 of KCSIE);
- violating of the rights of pupils;
- sustained or serious bullying, or other deliberate behaviour that undermines pupils, the profession, the school or colleagues;
- a deep-seated attitude that leads to harmful behaviour;
- dishonesty or a lack of integrity, including the deliberate concealment of their actions, especially where these behaviours have been repeated or had serious consequences.

Even though some of the behaviour found proved in this case indicated that a prohibition order would be appropriate, the panel went on to consider the mitigating factors. Mitigating factors may indicate that a prohibition order would not be appropriate or proportionate.

The panel were in no doubt that Mr Thorndyke's actions had been deliberate, calculated and sexually motivated. There was no evidence presented to suggest that Mr Thorndyke was acting under extreme duress.

No evidence was submitted to attest to Mr Thorndyke's previous history or ability as a teacher. Nor was any evidence submitted to demonstrate that Mr Thorndyke had

achieved exceptionally high standards in both his personal and professional conduct or had contributed significantly to the education sector.

No mitigation evidence was submitted by Mr Thorndyke for the panel to consider. The panel was therefore unable to fully assess Mr Thorndyke's insight into his conduct and/or any remorse. On the documents before them, the panel did not find any evidence that Mr Thorndyke had expressed any insight into his behaviour or reflected in any way upon the impact his conduct had on Pupil A.

In respect of remorse, no evidence was presented by Mr Thorndyke to the panel. The panel did however note [REDACTED]. Whilst the panel took account of these remarks, in the absence of any evidence before them in support, they did not attribute to them any significant weight. The panel was satisfied that Mr Thorndyke had been given the opportunity to engage with the TRA and provide any documentation upon which he wished to rely in mitigation, but that he had chosen not to do so.

The panel took into account that Mr Thorndyke had admitted his conduct to the police in interview and that he pleaded guilty at court at the first opportunity. The panel did not however consider that this mitigated the severity of his behaviour.

The panel first considered whether it would be proportionate to conclude this case with no recommendation of prohibition, considering whether the publication of the findings made by the panel would be sufficient.

The panel was of the view that, applying the standard of the ordinary intelligent citizen, it would not be a proportionate and appropriate response to recommend no prohibition order. Recommending that the publication of adverse findings was sufficient would unacceptably compromise the public interest considerations present in this case, despite the severity of the consequences for Mr Thorndyke of prohibition.

The panel was of the view that prohibition was both proportionate and appropriate. The panel decided that the public interest considerations outweighed the interests of Mr Thorndyke. The extremely grave nature of the multiple sexual offences committed, all involving a pupil who he taught, were significant factors in forming that opinion. Accordingly, the panel made a recommendation to the Secretary of State that a prohibition order should be imposed with immediate effect.

The panel went on to consider whether or not it would be appropriate to recommend that a review period of the order should be considered. The panel was mindful that the Advice states that a prohibition order applies for life, but there may be circumstances, in any given case, that may make it appropriate to allow a teacher to apply to have the prohibition order reviewed after a specified period of time that may not be less than two years.

The Advice indicates that there are behaviours that, if proved, would militate against the recommendation of a review period. The behaviours the panel found relevant to Mr Thorndyke were:

- serious sexual misconduct, such as where the act was sexually motivated and resulted in, or had the potential to result in, harm to a person or persons, particularly where the individual has used his professional position to influence or exploit a person or persons;
- any sexual misconduct involving a child; and
- any activity involving viewing, taking, making, possessing, distributing or publishing any indecent photograph or image or indecent pseudo photograph or image of a child.

The panel was in no doubt that Mr Thorndyke's misconduct was of the most serious kind and wholly incompatible with being a teacher. This was supported by Mr Thorndyke receiving a prison sentence of 54 months, being placed on the Sex Offender's Register indefinitely and being made subject to a Sexual Harm Prevention Order for 10 years and a Restraining Order for 5 years.

The panel decided that the findings indicated a situation in which a review period would not be appropriate and, as such, decided that it would be proportionate in all the circumstances for the prohibition order to be recommended without provision for a review period.

Decision and reasons on behalf of the Secretary of State

I have given very careful consideration to this case and to the recommendation of the panel in respect of both sanction and review period.

In considering this case, I have also given very careful attention to the Advice that the Secretary of State has published concerning the prohibition of teachers.

In this case, the panel has found all of the allegations proven and found that those proven facts amount to relevant convictions.

The panel has made a recommendation to the Secretary of State that Mr Rory Thorndyke should be the subject of a prohibition order, with no provision for a review period.

In particular, the panel has found that Mr Thorndyke is in breach of the following standards:

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by

- Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others
- Teachers must have proper and professional regard for the ethos, policies and practices of the school in which they teach;
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel also states that it, “considered Mr Thorndyke's conduct to be of the utmost seriousness and extremely grave. His behaviour was completely incompatible with the standards and behaviour expected of any member of the public, let alone a teacher who is placed in the position of trust with children.”

The findings of misconduct are particularly serious as they include findings of penetrative sexual activity with children and possession of indecent images of children.

I have to determine whether the imposition of a prohibition order is proportionate and in the public interest. In considering that for this case, I have considered the overall aim of a prohibition order which is to protect pupils and to maintain public confidence in the profession. I have considered the extent to which a prohibition order in this case would achieve that aim taking into account the impact that it will have on the individual teacher. I have also asked myself, whether a less intrusive measure, such as the published finding of unacceptable professional conduct and conduct that may bring the profession into disrepute, would itself be sufficient to achieve the overall aim. I have to consider whether the consequences of such a publication are themselves sufficient. I have considered therefore whether or not prohibiting Mr Thorndyke, and the impact that will have on the teacher, is proportionate and in the public interest.

In this case, I have considered the extent to which a prohibition order would protect children and safeguard pupils. The panel has observed, “The panel noted that whilst much of Mr Thorndyke's conduct took place outside of the education setting, all of his behaviour involved Pupil A, who was one of his pupils. Given the severity of his actions, which included breach of a position of trust not only in respect of Pupil A but also Pupil A's family, elements of grooming and the forming of an inappropriate sexual relationship with a child, the panel were in no doubt that Mr Thorndyke's conduct was highly relevant to his profession as a teacher and to teaching, working with children and/or working in an education setting.” A prohibition order would therefore prevent such a risk from being present in the future.

I have also taken into account the panel's comments on insight and remorse, which the panel sets out as follows, "No mitigation evidence was submitted by Mr Thorndyke for the panel to consider. The panel was therefore unable to fully assess Mr Thorndyke's insight into his conduct and/or any remorse. On the documents before them, the panel did not find any evidence that Mr Thorndyke had expressed any insight into his behaviour or reflected in any way upon the impact his conduct had on Pupil A.

In respect of remorse, no evidence was presented by Mr Thorndyke to the panel. The panel did however note [REDACTED] which stated [REDACTED]. Whilst the panel took account of these remarks, in the absence of any evidence before them in support, they did not attribute to them any significant weight. The panel was satisfied that Mr Thorndyke had been given the opportunity to engage with the TRA and provide any documentation upon which he wished to rely in mitigation, but that he had chosen not to do so."

In my judgement, the lack of insight and full remorse means that there is some risk of the repetition of this behaviour and this puts at risk the future wellbeing of pupils. I have therefore given this element considerable weight in reaching my decision.

I have gone on to consider the extent to which a prohibition order would maintain public confidence in the profession. The panel observe, "The panel also took account of the way the teaching profession is viewed by others. The panel considered that Mr Thorndyke's behaviour in committing the offences could affect public confidence in the teaching profession, given the influence that teachers may have on pupils, parents and others in the community."

I am particularly mindful of the serious sexual elements in this case and the impact that such a finding has on the reputation of the profession.

I have had to consider that the public has a high expectation of professional standards of all teachers and that the public might regard a failure to impose a prohibition order as a failure to uphold those high standards. In weighing these considerations, I have had to consider the matter from the point of view of an "ordinary intelligent and well-informed citizen."

I have considered whether the publication of a finding of unacceptable professional conduct, in the absence of a prohibition order, can itself be regarded by such a person as being a proportionate response to the misconduct that has been found proven in this case.

I have also considered the impact of a prohibition order on Mr Thorndyke himself. The panel comment "No evidence was submitted to attest to Mr Thorndyke's previous history or ability as a teacher. Nor was any evidence submitted to demonstrate that Mr

Thorndyke had achieved exceptionally high standards in both his personal and professional conduct or had contributed significantly to the education sector.”

A prohibition order would prevent Mr Thorndyke from teaching and would also clearly deprive the public of his contribution to the profession for the period that it is in force.

In this case, I have placed considerable weight on the panel’s comments, “The extremely grave nature of the multiple sexual offences committed, all involving a pupil who he taught, were significant factors in forming that opinion. Accordingly, the panel made a recommendation to the Secretary of State that a prohibition order should be imposed with immediate effect.”

I have given less weight in my consideration of sanction therefore, to the contribution that Mr Thorndyke has made to the profession. In my view, it is necessary to impose a prohibition order in order to maintain public confidence in the profession. A published decision, in light of the circumstances in this case, that is not backed up by full remorse or insight, does not in my view satisfy the public interest requirement concerning public confidence in the profession.

For these reasons, I have concluded that a prohibition order is proportionate and in the public interest in order to achieve the intended aims of a prohibition order.

I have gone on to consider the matter of a review period. In this case, the panel has recommended that no provision should be made for a review period.

I have considered the panel’s comments “The Advice indicates that there are behaviours that, if proved, would militate against the recommendation of a review period. The behaviours the panel found relevant to Mr Thorndyke were:

- serious sexual misconduct, such as where the act was sexually motivated and resulted in, or had the potential to result in, harm to a person or persons, particularly where the individual has used his professional position to influence or exploit a person or persons;
- any sexual misconduct involving a child; and
- any activity involving viewing, taking, making, possessing, distributing or publishing any indecent photograph or image or indecent pseudo photograph or image of a child.

The panel was in no doubt that Mr Thorndyke’s misconduct was of the most serious kind and wholly incompatible with being a teacher. This was supported by Mr Thorndyke receiving a prison sentence of 54 months, being placed on the Sex Offender’s Register indefinitely and being made subject to a Sexual Harm Prevention Order for 10 years and a Restraining Order for 5 years.

The panel decided that the findings indicated a situation in which a review period would not be appropriate and, as such, decided that it would be proportionate in all the circumstances for the prohibition order to be recommended without provision for a review period.

I have considered whether not allowing for a review period reflects the seriousness of the findings and is proportionate to achieve the aim of maintaining public confidence in the profession. In this case, the factors which mean that a no review period is necessary and in the public interest are the serious nature of the offences and the lack of full insight and remorse.

I consider therefore that allowing for no review period is necessary to maintain public confidence and is proportionate and in the public interest.

This means that Mr Rory Thorndyke is prohibited from teaching indefinitely and cannot teach in any school, sixth form college, relevant youth accommodation or children's home in England. Furthermore, in view of the seriousness of the allegations found proved against him, I have decided that Mr Rory Thorndyke shall not be entitled to apply for restoration of his eligibility to teach.

This order takes effect from the date on which it is served on the teacher.

Mr Rory Thorndyke has a right of appeal to the King's Bench Division of the High Court within 28 days from the date he is given notice of this order.

A handwritten signature in blue ink, appearing to read 'Alan Meyrick', followed by a vertical line.

Decision maker: Alan Meyrick

Date: 18 November 2022

This decision is taken by the decision maker named above on behalf of the Secretary of State.