

## Clifton College

32 College Road, Clifton, Bristol BS8 3JH

**Date of visit** 01 July 2015

### Purpose of visit

This was an unannounced emergency visit at the request of the Department for Education which focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs) and the National Minimum Standards for Boarding Schools 2015 (NMS), particularly those concerned with safeguarding; pupils' welfare, health and safety; suitability of staff, supply staff and proprietor; handling of complaints; and leadership and management.

### Characteristics of the School

Clifton College was established in 1862 in Bristol as a day and boarding school. It began as a boys' school and became co-educational in 1987. It provides education for pupils aged from three to eighteen years. There are four day houses (three for boys and one for girls); one day and boarding house (for girls); and six boarding houses (four for boys and two for girls). The school currently has 692 pupils on roll, including 301 boarders. There are 421 boys and 271 girls. The Early Years Foundation Stage has 84 children. 156 pupils are identified by the school as having SEND, though there are none with a statement of special educational needs and/or disabilities or Education, Health and Care Plan. Currently, there are 139 pupils who require support for English as an additional language (EAL). The school is a charity, administered by a board of governors known as the Council. The previous ISI intermediate boarding inspection took place in December 2013.

### Inspection findings

#### **Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraphs 7(a) and (b) and 8 (a) and (b) and NMS 11 and 12] and Provision of Information [ISSR Part 6 paragraph 32(1)(g)]**

The regulations and standard 11 are not met.

The child protection policy in place at the time of the visit shows concern for pupils and promotes their welfare, but the arrangements described in it and implemented in the school do not fully reflect the latest statutory guidance. The policy was last updated in April 2015. The policy refers to the previous versions of *Keeping Children Safe in Education* (KCSIE) (2014) and *Working Together to Safeguard Children* (2013). It does not indicate that the school contributes to inter-agency working in accordance with the LSCB, or give guidance for staff who have concerns that a child might be in need or at risk. The policy does not

include a clear account of the way allegations or suspicions of abuse are reported in the school, but refers to a separate document only available to staff. The policy does not state that such allegations against staff and volunteers must be reported to the head or DSL (and the head informed if to the DSL); against the DSL to the head; and against the head to the chair of governors without the head being informed. Responses from staff to questions about procedures in the case of safeguarding allegations were inconsistent, and ranged from correct understanding about referral to the DSL to a presumption of the right to exoneration.

In the case of an allegation against the head, staff said that they would either go to the chairman directly, or seek advice from the DSL, or contact the LADO. Differing accounts were given by senior staff and governors as to how they would expect an allegation against the head to be responded to. The DSL correctly states that such an allegation would be referred to the chairman of governors, and that whether or not the head would be informed would depend on the nature of the allegation, i.e. if the allegation against the head was one of abuse of a pupil, the head would not be informed. Contact details for the LADO are not given, and the function of the LADO in providing advice and presiding over the investigation of any allegation or suspicion of abuse directed against anyone working in the school is not explained. There is no indication that allegations must be reported to the LADO immediately and within one working day at the latest, or that if a crime may have been committed, the matter should be reported to the police. The policy does not make clear that the school would not investigate allegations before first speaking to the LADO; or provide for a report to be sent promptly to the DBS, if the school dispenses with a person's services because of unsuitability to work with children, or would have done so had the person not resigned; or state that consideration is given to making a referral to the NCTL in such circumstances. The college is aware of the requirement to report to DBS, but until recently was not aware of the requirement to consider referral to NCTL.

In a recent case, the school has met regularly with the police and LADO and contributed to strategy discussions but has not always sought advice or contributed fully to inter-agency working. In particular, communication to parents arising from the casework has not first been shared with the LADO, and agencies have raised concerns about the school's engagement with ongoing investigations. Records indicate that senior staff responsible for safeguarding were aware of concerns but did not seek external advice in accordance with local procedures. Inspection evidence indicates that such concerns are valid as not all relevant information relating to allegations against members of staff was shared with inspectors during this visit.

The safeguarding policy does not make clear that safeguarding is everyone's responsibility and that anyone can make a referral to children's social care, stating instead that staff "may contact Social Care only (college's emphasis) if the DSL or the Deputy cannot be contacted". It does not give staff specific guidance to help them avoid allegations of abuse or make cross-reference to the staff code of conduct. The policy does not make provision for alternative accommodation to be found if a member of the boarding staff is suspended in circumstances of a child protection nature, or stress the school's response to relationships in boarding and the potential for abuse by peers. In interviews only some staff were able to demonstrate appropriate awareness of the code of conduct and the whistle-blowing policy.

The safeguarding policy does not outline the main responsibilities of the DSL as outlined in KCSIE 2015, or confirm that deputy DSLs named have relevant training and status, although in practice they do. The DSL confirmed that anyone can make a referral to him. The DSL is also confident that staff know about being able to make a referral and about procedures in the code of conduct, though responses from staff to this question were not consistent. The deputy DSLs confirmed that they meet as a team to decide if a referral is to be made to the LADO; and stated that school policies are in place to cover the specific roles of visiting music teachers and sports staff, although these were not seen.

The training of the DSL is in accordance with locally agreed procedures including child protection and inter-agency working. Training at the appropriate level has been carried out within the required interval for the DSL and deputy DSLs. Child protection training has been organised for all staff, but the DSL is unclear as to when all staff were last trained, especially long-serving members of staff. Records confirming attendance at training are confusing and do not clearly indicate exactly who was present or how absent members of teaching or support staff were to receive training at a later date. Most teaching and support staff interviewed are aware of safeguarding training they have received during the past two years, and report that peripatetic music staff not present for the training caught up with it later on. Induction training includes safeguarding training.

The DSL maintained that the safeguarding policy was appropriate, as it had been seen and “signed off” by the College Council (governors) and by the BSB, but no documentary evidence to verify the latter was seen. The DSL was unclear whether or not the Council meeting at which the safeguarding policy is signed off also serves as the required annual review of safeguarding.

Governors do not carry out a formal annual review of safeguarding, but have a termly review, led by a safeguarding governor. The minutes of the three most recent termly Council meetings indicate that an item on safeguarding is included in each agenda. Minutes indicate that discussion is focused on specific concerns or reports from sections of the school, rather than an overall view of safeguarding across the school. No set of minutes indicates that the required annual review of safeguarding had taken place at a particular meeting.

The DSL is confident that all pupils know whom to speak to, internally and externally, in case of a concern, and that they are each given a card with relevant contact details. This was strongly confirmed by pupils in interview. The DSL also confirmed that it was “normal” for pupils to have access to the private accommodation of staff, for example in case of accidents, or for social reasons, for example if they were invited to supper by resident staff and their families. There is no formal policy on access by pupils to private accommodation of housemasters/mistresses although the issue of pupils being alone with a member of staff is covered in general guidelines to staff on safe working practice. Staff confirmed that pupils are no longer taken out of school “unofficially” by staff and that all trips now have to be planned and notified to senior managers in advance. This is a new development as previous practice was less well controlled and it was not possible to confirm during the one-day visit whether the new arrangements are now suitably risk assessed and successfully implemented in practice in light of previous known events.

The medical centre staff deal competently with general pupil issues including self-harm, homesickness at the start of the academic year, academic pressures, and eating disorders. Good liaison between medical and house staff supports pupils’ welfare. Medical staff regularly contact parents of boarders in case of unhappiness, and are consulted on safeguarding matters by staff. The senior nurse meets regularly with senior pastoral staff. Support staff interviewed feel confident that they know what to do and whom to contact if they have any concerns, and show a good awareness of safeguarding issues.

Additional induction training is provided for housemasters/mistresses, and there is a focus on improving pastoral care provision for pupils, including the inclusion of appropriate issues in the newly reviewed PSHE programme. The college requires that all photographs are taken on school equipment, and has a policy for the safe use of electronic equipment, e-safety being regarded as a priority issue currently facing pupils. The college maintains a log of serious sanctions which is monitored by senior pastoral staff to ensure consistency of approach by staff. Questionnaires are used to inform staff and housemasters about pupil issues and concerns.

Pupils, including boarders, reported in interview that they are happy in school. They meet in their houses every morning and have good relationships with house staff and with senior pupils. They feel safe and confirm that they are given much advice regarding internet safety. They raised no particular problems or concerns, saying they felt quite prepared to talk to any member of staff if they had concerns, for example, about the welfare of a friend. House matrons and the school counsellor were felt to be quite accessible. House prefects receive safeguarding training. Pupils report very little cyberbullying, and that it is quickly sorted out by the college. They describe the college as a very happy place: their main concerns relate to academic pressures around exam time. Pupils like the freedom of being allowed out after school and appreciate the procedures in place to protect them. They feel that everyone takes care of them, and that staff are always available in the houses. The school council has positively contributed to changes suggested by pupils, including to the sixth form dress code and the choice of food available especially at breakfast. International boarders are allocated a buddy to help them settle in. Punishments are felt to be fair on the whole, but occasionally inconsistently applied by teachers. Many pupils referred to the feeling of trust that exists in the college.

#### **Suitability of staff, supply staff and proprietor [ISSR Part 4, paragraphs 18-21 and NMS 14]**

The regulations are not met.

The policy for safer recruitment is fit for purpose although there have been some deficiencies in implementation. The single central register of appointments is mainly accurately maintained but a small number of pertinent items of information are missing. These relate in particular to entries for sports coaches, who are engaged in teaching but for whom prohibition checks have not been carried out on the basis that as coaches they are not left alone with children but are accompanied by Master in Charge. During the one-day visit, it was not possible to view any risk assessments or other documentation that might have been in place to confirm the arrangements. All staff are subject to an enhanced disclosure and barred list check and most other checks are completed satisfactorily. For some recent sports coach appointments, qualifications and CVs were missing.

#### **Manner in which complaints are handled [ISSR Part 7, paragraph 33 and NMS 18]**

The regulation and standard are not met.

The complaints procedure is not fully compliant. No time scale is given for resolution of a complaint at the informal stage, beyond the use of words such as “quickly”, “straightaway”, and, in the general introduction, a reference to the college’s aim “to complete each stage of the procedure within 28 days when reasonably possible”. It does not make provision for a written record to be kept of actions taken by the college as a result of any formal complaints (regardless of whether they are upheld).

Three parental complaints are currently “live” and well recorded. Two appear to be handled with care and in accordance with the current procedures. One complaint has taken longer to reach resolution.

#### **Quality of leadership in and management of schools [ISSR Part 8, paragraph 34 and NMS 13]**

The regulation and standard are not met.

The college Council, as proprietor, is aware of the importance of safeguarding, and confirmed that all governors had been trained in June 2015 by the DSL, who distributed copies of KCSIE 2015 and “What to do if you are worried a child is being abused”. They question the heads of the different parts of the college at every Council meeting in relation to safeguarding. The chairman is aware of the checks that need to be made on staff: Governors then rely on those responsible to carry out those checks and do not monitor implementation further, for example by scrutiny of the SCR. The governors’ compliance committee, attended by three governors and several staff, includes in its remit oversight of trips and risk assessments, as well as the review and rewriting of the trips and visits policy, which itself has been reviewed by Bristol Safeguarding.

Those with leadership and management responsibilities have not fulfilled their responsibilities effectively to ensure that the independent school standards are met consistently, and in some aspects of their work have not demonstrated sufficient skills and knowledge appropriate to their roles.

The school’s governing body has not monitored the effectiveness of the leadership, management and delivery of the welfare provision in the school, and has not taken appropriate action to safeguard the welfare of some pupils. The arrangements for monitoring and overseeing boarding and the promotion of welfare of pupils have not been sufficiently robust. This includes arrangements allowing pupils to enter staff accommodation and which, until recently, allowed pupils to be taken off site to the homes of staff without adequate supervision or other safeguards.

## **Regulatory action points**

The school does not meet all the requirements of the Education (Independent School Standards) Regulations 2014 and the National Minimum Standards for Boarding Schools 2015.

### **Welfare, Health and Safety [ISSR Part 3, paragraph 7(a) and (b) and paragraph 8(a) and (b) and NMS 11]**

- Improve the wording and implementation of the safeguarding policy to bring it into line with the most recent requirements, in particular:
  - Update references to KCSIE 2015 and other recent statutory guidance
  - Make reference to the school’s contribution to inter-agency working
  - Clarify reporting procedures in case of allegations of suspicions of abuse against staff and volunteers
  - Clarify the wording of the policy to make it clear that referrals of allegations against the head are made to the chairman without the head being informed
  - Include contact details for the LADO
  - Describe the function of the LADO in providing advice and presiding over the investigation of any allegation or suspicion of abuse
  - Ensure that all allegations are reported to the LADO within 24 hours
  - Ensure that the LADO is consulted before any investigation takes place, or actions taken within an investigation
  - Inform police if a crime may have been committed
  - Give guidance concerning children at risk or in need
  - Make clear that anyone can make a referral
  - Report to the DBS and NCTL any member of staff whose services are dispensed with because of concerns about their suitability to work with children

- Cross-refer guidance to staff to help them avoid allegations of abuse with the code of conduct
- Cross-refer to the college recruitment procedures
- Include reference to disqualification by association in the recruitment policy
- Outline the main responsibilities of the DSL in accordance with KCSIE 2015
- Confirm training requirements of the DSLs
- Stipulate that induction training includes the code of conduct, whistleblowing policy, KCSIE 2015
- State that all staff must read KCSIE 2015 part one and seek appropriate confirmation that they have done so
- Provide guidance on preventing and dealing with peer on peer abuse in boarding
- Maintain accurate safeguarding training logs and attendance records for staff
- Ensure that all staff know what to do in case of an allegation of abuse against staff or the head
- Clarify appropriate arrangements under which pupils might have access to staff accommodation and ensure that all pupils and staff are made aware
- Ensure that governors carry out a formal annual review of safeguarding policy and procedures and the efficiency of their implementation
- When working with other agencies, and for inspection, ensure that there is full and prompt sharing of all relevant information

The school is strongly recommended to make reference in the safeguarding policy to provision for alternative accommodation to be found if a member of the resident staff is suspended in circumstances of a child protection nature. The school is also recommended to monitor the new arrangements in place for occasions when pupils are taken out of the school by staff or visit their private accommodation or homes, including risk assessment where appropriate.

#### **Suitability of staff, supply staff and proprietor [ISSR Part 4 paragraphs 18 and 21]**

- Ensure that all required checks are carried out before the appointment is taken up [18(2)(b) and (c)]
- Ensure that all checks are appropriately recorded in the SCR [21(3)(a)(iv)and(b)]

#### **Provision of information [ISSR Part 6 paragraph 32]**

- Ensure that all information reasonably requested in the course of an inspection is provided [32(1)(g)]

#### **Manner in which complaints are handled [ISSR Part 7 Paragraph 33 and NMS 18.1]**

- Set out clear timescales for the management of a complaint [33(c)]
- Ensure the policy stipulates that records are kept of all formal complaints, whether they are resolved following a formal procedure or proceed to a panel hearing, and the action taken by the school as a result of these complaints. [33(j)]

#### **Quality of leadership in and management of schools [ISSR Part 8 Paragraph 34 and NMS 13]**

- Ensure that those with leadership and management responsibilities demonstrate good skills and knowledge appropriate to their role and fulfil their responsibilities effectively, including in relation to safeguarding [34(1)(a)&(b) and NMS 13.3 & 13.4]
- Ensure that the well-being of pupils is actively promoted at all times, including by sharing all relevant information with relevant agencies and inspectors in a timely manner [34(1)(c) and NMS 13.5]
- Ensure that the governing body monitors the effectiveness of the leadership, management and delivery of the boarding and welfare provision in the school, and takes appropriate action where necessary to promote the welfare of pupils at all times [NMS 13.1].