



ISI Independent
Schools
Inspectorate

**Regulatory Compliance Inspection Report
For Schools with Residential Provision**

Epsom College

December 2021

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School's Details

College	Epsom College			
DfE number	936/6030			
Registered charity number	312046			
Address	Epsom College College Road Epsom Surrey KT17 4JQ			
Telephone number	01372 821000			
Email address	info@epsomcollege.org.uk			
Headmaster	Mr Jay Piggot			
Chair of governors	Dr Alastair Wells			
Age range	11 to 18			
Number of pupils on roll	1069			
	Day pupils	760	Boarders	309
	Seniors	702	Sixth Form	367
Inspection dates	8 to 10 December 2021			

1. Background Information

About the school

- 1.1 Epsom College is an independent co-educational day and boarding school. It is a Christian foundation, operating as a charitable company, limited by guarantee and governed by a board of trustees who are appointed by the Council of the Royal Medical Foundation. It was founded in 1855, as the Royal Medical Benevolent College, to support orphans and widows of the medical profession. The school comprises 13 single-sex houses, seven of which are for day pupils, five are for boarders, and one accommodates both day and boarding female pupils. Since the previous inspection, the school has begun work on an extension for academic and cultural enrichment and installed an all-weather sports pitch.
- 1.2 During the period March to August 2020, the school remained open for children of key workers and for day pupils in Year 10 and Year 12 for a limited period at the end of the summer term 2020. No boarders remained on site. During this period of closure the school provided remote learning materials for all pupils.
- 1.3 In the interests of infection control during the COVID-19 (coronavirus) pandemic, inspection evidence was gathered partly remotely and partly on-site to reduce contact within the school setting.
- 1.4 In line with the direction given by the Department for Education (DfE) at the time, no evaluation has been made of the nature or effectiveness of any provision made during the period March to August 2020, including its impact on pupils' learning, achievement or personal development. Any concerns relating to pupils' welfare during this period which directly relate to measures implemented by the school have been considered.
- 1.5 During the lockdown period of January to March 2021, all pupils other than vulnerable pupils or the children of key workers received remote learning provision at home. Overseas boarders that did not return home received remote learning at the home of their parents or guardians.
- 1.6 In 2020 and 2021, public examinations were not held. For pupils who would have been expected to take these examinations, centre-assessed grades and teacher-assessed grades were awarded.

What the school seeks to do

- 1.7 The school aims for pupils to develop an attachment to the life of the mind through the provision of exceptional academic, social, sporting and cultural opportunities in a safe, inspiring and supportive community. It seeks to challenge pupils to develop their talents, broaden their interests and become confident in themselves, as well as being inclusive and appreciative of others. It endeavours to provide a flourishing co-educational environment for boarding and day pupils, creating a community where pupils experience happiness, challenge and high achievement alongside the development of passions for the things that will matter to them for the rest of their lives.

About the pupils

- 1.8 Pupils come from a wide range of backgrounds, with over 30 different nationalities represented. Nationally standardised test data provided by the college indicate that the ability of senior pupils is above the national average and that of sixth-form pupils is broadly in line with the national average. The school has identified 221 pupils as having special educational needs and/or disabilities (SEND) including dyslexia and developmental co-ordination disorder, 80 of whom receive additional specialist help. Two pupils have an education, health and care (EHC) plan. English is an additional language (EAL) for 58 pupils, seven of whom receive additional specialist help. The most able pupils, many of whom

have been awarded scholarships or exhibitions, receive specific challenges, both inside and outside of the classroom.

About the inspection

- 1.9 For this inspection, the DfE requested a particular focus on ISSR Part 1 (curriculum, relationships and sex education, teaching and assessment), Part 2 (spiritual, moral, social and cultural development) and Part 3 (welfare, health and safety) and related NMS to ensure that pupils are safeguarded effectively, that the quality of education provided fosters a culture of positive relationships and respect for protected characteristics, and that the school implements a curriculum for relationships and sex education which meets the requirements of the statutory guidance.
- 1.10 Details relating to this particular focus can be found at the end of the Regulatory Compliance section under the heading 'Additional information on particular areas of focus' beginning on page 11.

2. Regulatory Compliance Inspection

Preface

The Independent Schools Inspectorate (ISI) is approved by the Secretary of State to inspect schools which are, or whose heads are, in membership of the associations which form the Independent Schools Council (ISC) and report on the extent to which they meet the Independent School Standards ('the standards') in the Schedule to the Education (Independent School Standards) Regulations 2014, including the National Minimum Standards for Boarding ('boarding NMS'), where applicable. Additionally, inspections report on the school's accessibility plan under Schedule 10 of the Equality Act 2010 and the ban on corporal punishment under section 548 of the Education Act 1996. Inspections also comment on the progress made to meet any compliance action points set out in the school's most recent statutory inspection.

ISI inspections are also carried out under the arrangements of the ISC Associations for the maintenance and improvement of the quality of their membership.

This is a COMPLIANCE ONLY inspection and as such reports only on the school's compliance with the standards, including the boarding NMS. The standards represent minimum requirements and judgements are given either as **met** or as **not met**. All schools are required to meet all the standards applicable to them. Where the minimum requirements are not met, this is clearly indicated and the school is required to take the actions specified.

Inspections do not include matters that are outside of the regulatory framework described above, such as: an exhaustive health and safety audit; compliance with data protection requirements; an in-depth examination of the structural condition of the school, its services or other physical features; contractual arrangements with parents; an investigation of the financial viability of the school or its accounting procedures.

Inspectors may be aware of individual safeguarding concerns, allegations and complaints as part of the inspection process. Such matters will not usually be referred to specifically in published reports in this document but will have been considered by the team in reaching its judgements.

Links to the standards and requirements can be found here: [The Education \(Independent School Standards\) Regulations 2014](#), [National Minimum Standards for Boarding Schools](#).

COVID-19: Inspection judgements do not cover the period March to August 2020 inclusive.

Key findings

- 2.1 The school does not meet all of the required standards in the schedule to the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools, and associated requirements, and should take immediate action to remedy deficiencies as detailed below.**

PART 1 – Quality of education provided

- 2.2 At GCSE in the years 2020 and 2021, performance has confirmed that teaching enables pupils to make good progress in the context of Part 1 paragraph 3(a).
- 2.3 In the sixth form, A-level results in the years 2020 and 2021 have confirmed that teaching enables pupils to make good progress in the context of Part 1 paragraph 3(a).
- 2.4 The curriculum is documented, supported by appropriate plans and schemes of work for the pupils and covers the required breadth of material. The teaching enables pupils to make good progress, encompasses effective behaviour management and is supported by suitable resources. A suitable framework for the assessment of pupils' performance is in place.
- 2.5 Pupils receive relationships and sex education in the school, except in so far as they are lawfully excused. The school has consulted parents and published a written statement of its policy which has regard to the relevant statutory guidance.
- 2.6 The standards relating to the quality of education [paragraphs 1–4] are met.**

PART 2 – Spiritual, moral, social and cultural development of pupils

- 2.7 The school actively promotes principles and values which facilitate the personal development of pupils as responsible and law-abiding citizens.
- 2.8 Boarders' views are actively encouraged, and their opinions and concerns are appropriately considered by staff. Any prefect system operating in the school is suitably managed.
- 2.9 The standard relating to spiritual, moral, social and cultural development [paragraph 5] and NMS 17 and 19 are met.**

PART 3 – Welfare, health and safety of pupils

- 2.10 Health and safety requirements are met, including those relating to fire safety; provision is made for first aid. Pupils are properly supervised; admission and attendance registers are maintained, as required, and there is a strategic approach to risk assessment. A disability access plan is in place.
- 2.11 An appropriate induction process for pupils new to boarding is implemented, and suitable provision is made for boarders' medical and health care, their food and drink and for managing boarders' laundry and possessions. Boarders have suitable contact with friends and family and access to a programme of activities. Boarding staff are appropriately trained and deployed.
- 2.12 The school's safeguarding policy was updated satisfactorily during the inspection but has yet to be implemented fully. Although safeguarding training has taken place, some teaching and support staff showed insufficient clarity in their understanding of current safeguarding requirements, including the reporting of low-level concerns. Safeguarding records do not support the requirements of current statutory guidance. The inefficient storage of different information on four separate systems prevents senior leaders and governors from collating information to produce an overview of incidents or concerns and identify patterns.

- 2.13 The recording of information relating to pupils' behaviour is not categorised clearly enough to indicate all instances of bullying, sexual harassment, sexual violence and peer-on-peer abuse, particularly those linked to the protected characteristics. This has resulted in those with particular safeguarding responsibilities not receiving information about pupils which is necessary for the effective implementation of the school's safeguarding policy and procedures. The school's behaviour and anti-bullying policies detail high expectations of behaviour linked to clear rewards and sanctions, but implementation of these is currently not fully effective. The behaviour of a small minority of pupils demonstrates a lack respect towards others, in particular those with protected characteristics. This is evident through their use of offensive comments and actions that include bullying, sexual harassment and racism.
- 2.14 **The standards relating to health and safety, fire prevention, first aid, supervision, pupil registration, and risk assessment in paragraphs 11 to 16 and NMS 2–4, 6–10, 15 and 16, the requirement of Schedule 10 of the Equality Act 2010 (accessibility plan), and the ban on corporal punishment under section 548 of the Education Act 1996 are met, but those in paragraphs 7 [safeguarding] and 8 [safeguarding of boarders], 9 [behaviour], 10 [measures to prevent bullying] and NMS 11 and 12 are not met.**

Action point 1

The school must ensure that behavioural incidents which impact on safeguarding are categorised, recorded as such and managed in accordance with statutory guidance, including those relating to peer-on-peer abuse; sexual harassment and sexual violence; and abusive behaviour towards those with protected characteristics [paragraphs 7(a) and (b), 8(a) and (b); NMS 11.1].

Action point 2

The school must ensure that there is effective overview and monitoring by leaders and governors of all safeguarding incidents, in particular those relating to inappropriate or sexualised behaviour, to ensure timely and appropriate action is taken in response [paragraphs 7(a) and (b), 8(a) and (b); NMS 11.1].

Action point 3

The school must ensure that its written behaviour and anti-bullying policies are implemented effectively enough to improve the behaviour of the small minority of pupils who demonstrate a lack of respect towards those with protected characteristics [paragraphs 9(b) and 10; NMS 11.1, 12.1 and 12.2].

Action point 4

The school must monitor the effectiveness of safeguarding training in order to ensure that all staff understand and implement consistently the requirements of current statutory guidance relating to safeguarding [paragraphs 7(a) and (b), 8(a) and (b); NMS 11.1].

PART 4 – Suitability of staff, supply staff, and proprietors

- 2.15 The school makes appropriate checks to ensure the suitability of staff, supply staff and proprietors, and a register is kept as required. Visitors to boarding accommodation are appropriately supervised and the school's arrangements for guardianship are suitably managed.
- 2.16 **The standards relating to the suitability of those in contact with pupils at the school [paragraphs 17–21] and NMS 14 are met.**

PART 5 – Premises of and accommodation at schools

2.17 Suitable toilet and changing facilities, and showering facilities where required by the standard, and appropriate accommodation for pupils' medical and therapy needs are provided. The premises are maintained to a standard commensurate with health and safety; acoustics and lighting are appropriate; water provision is adequate. Suitable outdoor space is provided for physical education and outdoor play. Boarding accommodation is adequate for the needs of all boarders, and safeguards and promotes their welfare.

2.18 The standards relating to the premises and accommodation [paragraphs 22–31] and NMS 5 are met.

PART 6 – Provision of information

2.19 A range of information is published, provided or made available to parents, inspectors and the Department for Education. This includes details about the proprietor, the ethos of the school and the curriculum, and of the school's arrangements for admission, behaviour and exclusions, bullying, health and safety, first aid, details of the complaints procedure, and the number of complaints registered under the formal procedure during the preceding school year, and the provision for any with education, health and care plans or English as an additional language. It also includes particulars of the school's academic performance during the preceding school year, inspection reports and (for parents only) a report at least annually of their own child's progress. The safeguarding policy is posted on the school's website. A suitable statement of boarding principles and practice is published by the school.

2.20 The standard relating to the provision of information [paragraph 32] and NMS 1 are met.

PART 7 – Manner in which complaints are handled

2.21 Parental complaints, if any, are handled effectively through a three-stage process, (informal, formal and a hearing before a panel of three, one of whom is independent of the school). Each stage has clear time scales, and at the third stage the panel can make findings and recommendations which are communicated to the complainant. Records are kept appropriately, including of any action taken, whether or not a complaint is successful, and identifying those relating to the boarding provision.

2.22 The standard relating to the handling of complaints [paragraph 33] and NMS 18 are met.

PART 8 – Quality of leadership in and management of schools

2.23 Appropriate leadership and management of boarding ensure that the required policies and records are maintained and effectively monitored.

2.24 The proprietor does not ensure that the leadership and management demonstrate good skills and knowledge, and fulfil their responsibilities effectively, so that the other standards are consistently met, and they actively promote the well-being of the pupils.

2.25 The standard relating to leadership and management of the school in paragraph 34 and NMS 13 are not met.

Action point 5

Those with governance, leadership and management responsibilities must ensure the independent school standards are met consistently and that they actively promote the well-being of pupils [paragraph 34(1)(a), (b) and (c); NMS 13.1, 13.3 – 13.5].

Additional information on particular areas of focus

Quality of education provided – relationships and sex education [ISSR Part 1, paragraph 2A]

- 2.26 The school has recently reviewed and revised appropriately the scheme for personal, social and health education (PSHE) which includes relationships and sex education (RSE) in line with the school's aims, statutory guidance and the Equality Act 2010.
- 2.27 The policy for RSE is available to parents on the school's website. The school has consulted parents, governors, staff and pupils appropriately and taken their views into consideration. The RSE scheme includes topics that are appropriate for the age and ability of all pupils, including the sixth form and is sufficiently flexible to include any current issues. Departmental leaders are developing a suitable range of resources to support the teaching of PSHE and RSE in all year groups. The school has identified that the time allocation for PSHE and RSE is insufficient in Years 10 and 11 due to a termly rotation with religious education and physical education. Additional and suitable assemblies, tutor times and presentations by expert speakers which have been put in place ensure that all of the required aspects are taught currently. The timetable will be adjusted from September 2022 in order that all pupils receive one lesson of PSHE each week.

Quality of education provided – teaching [ISSR Part 1, paragraph 3]

- 2.28 The age, aptitudes and needs of pupils are appropriately taken into account when planning the PSHE and RSE schemes of work. Assessment of PSHE and RSE is in the early stages of development but scrutiny of work indicated that pupils' learning and progress in RSE are evaluated effectively and teaching provides pupils with appropriate feedback. Staff responsible for leading RSE are suitably trained, including for the management of sensitive and personal issues and questions. Some pupils stated to inspectors that they think topics such as consent and sexual harassment should be taught earlier in the lower school. School staff agree with this viewpoint and supported a group of older pupils in presenting information to younger pupils highlighting what they wish they had known at a younger age. During wide-ranging discussions, pupils stated to inspectors that they would like further opportunities for pupils to discuss sex and relationships in relation to their experiences, understanding and beliefs. Although some staff lack confidence in teaching RSE, overall teaching shows good understanding of RSE. It does not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those of different faiths and beliefs; nor discriminate against pupils contrary to Part 6 of the Equality Act 2010.

Spiritual, moral, social and cultural development of pupils [ISSR Part 2, paragraph 5; NMS 17 and 19]

- 2.29 The curriculum, school policies, assemblies and presentation to pupils are suitable and promote the fundamental British values of democracy, the rule of law, individual liberty, tolerance of those with different faiths and beliefs and, overall, mutual respect. Through their studies, through boarding and through taking part in a wide range of activities most pupils develop their self-knowledge and high levels of self-esteem and self-confidence. Most demonstrate general knowledge and respect for public institutions and respect for democracy. Boarders are encouraged to contribute their views to the operation of boarding, and their views are given appropriate consideration by staff. Boarders are able to raise concerns and make complaints without being penalised for doing so. Prefects are trained and supervised appropriately. During discussions prefects stated that they take their role and responsibilities seriously including supporting and guiding younger boarders as role models.

Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraphs 7 and 8; NMS 11 and 16]

- 2.30 The safeguarding policy is supplemented by appropriate additional policies which outline the code of conduct for staff, whistleblowing and the procedures to be taken to ensure the safe recruitment of

staff. The safeguarding policy states the importance of listening to pupils and provides suitable guidance to staff with regard to managing pupil disclosures. During discussions pupils confirmed that there are several staff within the school to whom they could turn if they were worried or concerned. However, some pupils expressed concern about potential lack of confidentiality if they raised concerns. The school is aware of this and ensures that pupils also have access to external helplines and support services.

- 2.31 The school has recently strengthened the leadership of safeguarding and has an appropriate structure and capacity to deal with safeguarding issues and to promote the welfare of pupils. The designated safeguarding lead (DSL) is supported by six deputy DSLs located strategically throughout the school. During the inspection, arrangements were put in place for the safeguarding team to meet regularly to discuss safeguarding issues. All members of the safeguarding team have received the appropriate level of safeguarding training within the last two years. Training records indicate that all staff and governors have received the required training and additional updates. Recent training has included focus on peer-on-peer abuse, sexual harassment, sexual violence and safe practice when teaching remotely. All staff have read Part 1 and Annex A of the statutory guidance *Keeping Children Safe in Education*. Although the required safeguarding training has taken place, some teaching and support staff are not always clear about current safeguarding requirements including the reporting of low-level concerns. During discussions, pupils stated that they learn how to keep safe in their PSHE lessons, including online safety. Posters around the school remind pupils, staff and visitors who the members of the safeguarding team are, and leaflets handed to visitors are effective in detailing safeguarding procedures that must be followed in line with the college's safeguarding policy.
- 2.32 The school has in place an electronic system for recording child protection incidents that is now managed by the recently appointed DSL. There are also simultaneous systems for recording behaviour and sanctions, medical conditions and treatment. Information from these systems is not collated effectively. This means that the DSL does not have a full overview and is not able to identify all significant patterns. A number of incidents in the behaviour log have not been categorised to indicate bullying, peer-on-peer abuse, sexual harassment, sexual violence and abuse linked to the protected characteristics. The safeguarding governor and the DSL were not aware of all of these cases and that not all relevant cases are being managed under the school's safeguarding policy and procedures.
- 2.33 The school liaises as required with local agencies and the police. It takes prompt action if concerns are expressed about a child or about a member of staff. Staff understand that anyone can make a referral to children's services. The DSL understands the local authority thresholds and when to make a referral or seek advice. The school has put suitable risk assessments and support in place for pupils when a referral is made, and a threshold is not reached for action to be taken by children's services or the police.

Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 12]

- 2.34 The school has an appropriate written behaviour policy which sets out the standards it expects of pupils, a suitable system of rewards and the sanctions to be enforced in the event of inappropriate behaviour. In line with the aims of the college, it seeks to promote good behaviour, self-discipline and respect.
- 2.35 However, the policy is not implemented with full effectiveness, as elements in the culture of the school do not encompass the values and attitudes which the policy seeks to embed. Although the majority of pupils behave appropriately and display positive values and attitudes, behaviour records, extensive discussions with pupils and observations of behaviour around the school indicate that a small minority of pupils do not treat others with mutual respect and tolerance, in particular those with protected characteristics. Some male and female pupils referred to the use of offensive racist and homophobic language and some female pupils stated that overbearing behaviour and the use of sexist language by a minority of male pupils impacts their confidence, self-esteem and daily lives. Characteristic of such behaviour is a lack of respect towards others and use of inappropriate actions and offensive language

which are undermining, hurtful and degrading. This is acknowledged in the school's own review of behaviour and in discussions with staff and pupils. Although the majority of questionnaire responses were positive, the views expressed in discussion with inspectors were also replicated in some comments from parents and pupils in the inspection questionnaires.

- 2.36 Inspection evidence indicates that governance and leadership do not acknowledge fully the impact of these behaviours on the daily lives of some pupils. Pupils state strongly that much of this abusive behaviour goes unreported because there is a culture within the school of not reporting on other pupils. Also, some behaviour by some male pupils includes bragging about sanctions received for sexual harassment and a continuation of the behaviour for which the sanction was given. Although the behaviour policy outlines clear procedures for rewards and sanctions, staff are not consistent in the way these are administered. Sometimes inappropriate language, comments or behaviours are ignored or reframed as being typical of behaviour from male pupils or excused, contrary to KCSIE, as 'banter' by some staff and pupils.
- 2.37 The school's programme for PSHE and RSE seeks to address these behavioural issues is being developed further. However, it is not yet embedded fully throughout the school.

Welfare, health and safety of pupils – bullying [ISSR Part 3, paragraph 10; NMS 12]

- 2.38 The school has an appropriate policy for bullying which sets out clearly the measures that should be taken to prevent and deal with bullying should it occur. During discussions pupils indicated strongly that they understood all forms of bullying including physical and psychological bullying. They stated clearly that bullying should not be tolerated including by standing by and doing nothing if a person is being bullied. Where bullying is reported, records show that there is discussion with both the perpetrator and victim, and parents of all parties are kept informed. Records indicate instances of bullying are not always referred appropriately to the DSL in order that further consideration may be given regarding referrals to children's services and the police.
- 2.39 Although pupils state strongly that bullying is not acceptable, they do not always tell staff when they experience bullying behaviour as there is a culture within the school of not reporting on other pupils.

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

- 2.40 Scrutiny of the complaints file indicates that parental complaints are handled effectively through a three-stage process, (informal, formal and a hearing before a panel of three, one of whom is independent of the school). Each stage has clear time scales, and at the third stage the panel can make findings and recommendations which are communicated to the complainant. Records are kept appropriately, including of any investigations, action taken, whether or not a complaint is successful, and identifying those relating to the boarding provision. During discussions, governors were aware of complaints made against the school and were able to demonstrate that the school's complaints policy and procedures had been implemented appropriately.

Quality of leadership and management [ISSR Part 8, paragraph 34; NMS 13]

- 2.41 Governors and leaders have considered issues highlighted in the media linked to sexual harassment, sexual violence and discrimination and the associated potential risk to the well-being of pupils.
- 2.42 Although governors understand the importance of monitoring implementation of the school's policies and procedures, they are not sufficiently aware of behavioural issues in the school. In particular, that miscategorised behavioural incidents have not been shared with the DSL, meaning that the DSL's picture of safeguarding is incomplete and that the need for early intervention or referral to external agencies may be missed. Governors have not adequately promoted the well-being of all pupils by taking effective action to remedy the impact of the behaviour of a small number of pupils on the culture of the school, as was identified in the school's own internal review of behaviour shared with inspectors.

3. Inspection Evidence

3.1 The inspectors observed lessons, conducted formal interviews with pupils and examined samples of pupils' work. They held discussions with members of staff and with the chair of governors, the safeguarding governor and chair of the education committee, observed a sample of the extra-curricular activities that occurred during the inspection period, and attended form meetings and chapel. Inspectors visited boarding houses together with the learning support and educational resource areas. The responses of parents, staff and pupils to pre-inspection questionnaires were analysed, and the inspectors examined curriculum and other documentation made available by the school.

Inspectors

Dr Patricia Preedy	Reporting inspector
Mr David Scott	Accompanying inspector
Mr Sam Antrobus	Compliance team inspector (Executive chairman, ISA and IAPS schools)
Mr Adrian Dellar	Compliance team inspector (Senior deputy head, HMC school)
Mrs Niamh Green	Boarding inspector (Deputy head, GSA school)
Mr Andrew Towse	Boarding inspector (Director of boarding, ISA school)