

## Beechwood Sacred Heart

Pembury Road, Tunbridge Wells, Kent, TN2 3QD

**Date of visit** 07 October 2015

### Purpose of visit

This was an unannounced emergency visit at the request of the Department for Education which focused on the senior school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs), the National Minimum Standards for Boarding and the EYFS requirements, in particular those covering the management of behaviour, bullying, supervision and the maintaining of risk assessments.

### Characteristics of the School

Beechwood Sacred Heart is a boarding and day school for pupils aged between three and eighteen years. The school was founded in 1919 as a Catholic school for girls. Since 1973, the school has been governed by a mainly lay governing body who are trustees of the Beechwood Trust. The co-educational preparatory school was opened in the 1980s, and the school became fully co-educational in 2009. Boys were able to become boarders in 2014. The school educates 386 pupils, of whom 176 are boys and 210 are girls. There are 141 pupils in the junior school up to Year 6. Of these, 29 children are under five years of age in the Early Years Foundation Stage (EYFS). No pupil has a statement of special educational needs or an education, health and care plan, but the school has identified 92 with special educational needs and/or disabilities (SEND) who receive support for their learning. Seventy-seven pupils have English as an additional language (EAL). The school had a full ISI inspection in February 2014.

### Inspection findings

The pupils spoken to were friendly and open about life in school. They appreciated the opportunities available to them and stated that pupils settle in quickly when new to the school. They felt the school provides a safe environment and considered that they are well supported and cared for by approachable staff.

#### **Welfare, health and safety of pupils - safeguarding [ISSR Part 3, paragraphs 7 and 8, NMS 11, EYFS requirements 3.4-3.7]**

The Regulations and Standard are not met.

The school's safeguarding policy makes provision to safeguard and promote pupils' welfare but it does not have full regard to the latest statutory guidance *Keeping Children Safe in Education (KCSIE)*. Most significantly, it implies a high threshold to be met before concerns will be referred to the local authority. The policy makes provision for an allegation of abuse against another pupil to be referred to the local authority. It does not state clearly how and

when allegations against staff will be reported to the local authority designated officer (LADO) for safeguarding. Staff spoken to were clear about passing on welfare concerns promptly and said that they would report allegations against staff to the school's designated safeguarding lead (DSL) although the policy requires them to report these to the head. The policy does not confirm that any allegations received by the DSL will be passed on immediately to the head. Definitions of different types of abuse do not match those in KCSIE. The policy lacks sufficient detail about meeting the school's wider safeguarding duties such as preventing radicalisation and extremism, promoting e-safety and dealing with mental health concerns. It lacks sufficient reference to the increased risks of relationship problems and peer abuse in boarding. The policy available on the website to parents at the time of the visit was a draft version dated September 2015 and the wording had not been finalised nor approved by governors. The safeguarding policy does not refer to the school's safe recruitment policy. This separate policy is currently inadequate as it does not commit the school to carrying out checks of prohibition from teaching or management, and disqualification by association. It makes no reference to the need for vetting checks for proprietors, volunteers or contractors. Associated with the safeguarding policy, but incorrectly stated to be included within it, the school has an appropriate code of conduct for staff which provides detailed guidance to ensure that their behaviour, actions and relationships enable pupils' welfare to be safeguarded and promoted.

Training for the DSL, his deputy and all other staff and adults working in the school is up to date in nearly all respects, and the training content is in line with local authority requirements although not all elements of training are stated clearly in the safeguarding policy. However, one peripatetic music teacher has not received training from the school, and one member of the catering staff has not received updates to training for over three years. The policy is not clear that new staff and other adults working in the school receive induction training covering the safeguarding policy, the code of conduct, the role of the DSL, and the whistleblowing policy. The school has recently invited a former police officer to talk to the pupils about e-safety.

Despite a high threshold for referring concerns to the appropriate authorities implicit in the policy wording, the school has nevertheless maintained effective relationships and contact with the local authority children's social care, and these are on-going. None has required a formal referral and the school has maintained effective links with other external agencies such as GP and counselling services and the child and adolescent mental health service. Child protection records are kept securely.

Recording of welfare concerns and possible safeguarding issues lacks sufficient detail to monitor developments over time and record all interactions with staff and agencies.

The school commissioned a two-day review of its safeguarding provision from the local authority child protection service in July 2015. Many useful recommendations were made. The school has started to consider these but, as yet, has not drawn up an action plan to prioritise action needed.

The DSL and safeguarding governor assist the board of trustees to carry out its required annual review by submitting a report summarising the year's issues and safeguarding activities. Although discussion with governors indicated that the report is discussed at board level, the brief minutes provide no confirmation that the board as a whole has satisfied itself that the school's procedures are efficient and rigorous. Inspection evidence does not confirm that any deficiencies in policy and practice have been identified and remedied as a result of this review.

### **Welfare, health and safety of pupils - behaviour [ISSR Part 3, paragraph 9, NMS 12, EYFS requirements 3.52]**

The Regulations and Standard are met.

Although the rewards and sanctions policy made available to parents is now more than two years old, it nevertheless forms a sound basis for promoting good behaviour and sets out

appropriate sanctions for misbehaviour. Other associated policies are more recent. None of the documents has full regard to the latest non-statutory guidance, although it is evident that implementation is effective and the school's practice takes this guidance into account, for example making appropriate adjustments for behaviour issues involving pupils with SEND. A wide range of sanctions is available to staff and the policy would benefit from clearer guidance as to the most appropriate sanction for particular situations. Nevertheless, pupils spoken to felt that sanctions are generally applied proportionally and consistently. Records of significant sanctions are kept, but are somewhat fragmented and maintained by several senior members of staff, and gaining a comprehensive overview of patterns and trends is not easily achieved. Despite this, good communication within this relatively small school enables senior staff to gain a clear picture of behavioural concerns and how they have been dealt with. The school keeps parents informed about significant misbehaviour.

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

The Regulations and Standard are met.

The anti-bullying policy is similarly more than two years old but it, too, provides a satisfactory basis for educating pupils about bullying, encouraging them to report it, and providing staff with appropriate responses. The policy lacks clear cross-reference to the school's cyber-bullying policy, which has useful advice for pupils on staying safe on-line. A small number of recent bullying cases have been clearly logged in a central record, with suitable responses and evidence of on-going monitoring. None have been deemed to constitute a safeguarding concern, an appropriate decision given the circumstances of each case. Pupils spoken to confirmed that bullying is very rare and that staff are vigilant and take appropriate action quickly and robustly if needed. They confirmed that the school's approaches and responses to bullying are made clear to them.

**Welfare, health and safety of pupils – supervision of pupils [ISSR Part 3, paragraph 15, NMS 15, EYFS requirements 3.28-3.36]**

The Regulations and Standard are met.

Clear guidance is provided to staff to ensure that they are effectively deployed around the school site during the school day and at break times and during activity periods. The school acted quickly in the aftermath of an incident occurring when pupils were left unsupervised, by drawing up a specific risk assessment, increasing supervision after school, and reminding staff that pupils must never be left unsupervised when working in workshops.

**Welfare, health and safety of pupils – risk assessments [ISSR Part 3, paragraph 16, NMS 6.3]**

The Regulations and Standard are met.

An appropriate risk assessment policy covers the areas of the school that need to be assessed together with an outline of the process, the method of recording, and monitoring arrangements. Samples of various risk assessments seen were deemed to be appropriate. Suitable use is made of generic risk assessment modules (for example, when travelling by minibus), and these are tailored for the particular activity involved. Some assessments deal with risks caused by pupils as well as physical risks. Completed risk assessments are carefully monitored and approved by the deputy head and facilities manager. Not all risk assessments are kept centrally, making it difficult for the school to retain central oversight of their effectiveness and identify a need for updating.

## Regulatory action points

The school does not meet all the requirements of the Independent School Standards Regulations 2014, National Minimum Standards for Boarding Schools 2015 and requirements of the Early Years Statutory Framework.

### **Welfare, health and safety of pupils - safeguarding [ISSR Part 3, paragraphs 7 and 8, NMS 11, EYFS requirements 3.4-3.7]**

Improve the wording and implementation of the safeguarding policy as follows:

#### Policy wording

- Provide clearer recognition of the school's responses to children at risk and children in need (other than in a footnote) and how staff will respond to both types of issue.
- Clarify the function of the LADO for advice and action in the event of allegations against staff.
- Ensure that procedures to deal with allegations against staff are included in the policy and that these include the following:
  - Confirm that allegations against staff reported to the DSL will be communicated to the Head immediately.
  - Confirm that allegations against staff or the Head will be referred to the LADO within one working day.
  - Confirm that the school may need to refer relevant cases to NCTL as well as to DBS.
- Ensure that the definitions of different types of abuse conform to those listed in KCSIE.
- Make a clearer commitment to share significant concerns about pupils' welfare (including borderline cases) with relevant external agencies. Remove the implied threshold for such referrals that suggests that only the most serious cases will be so referred and that pupils' or parents' wishes may over-ride such responses. Remove the suggestion that the school may carry out its own investigation before referring onwards.
- In cases of pupil/pupil abuse, confirm that contact will be made with children's social care rather than the LADO.
- Remove the incorrect policy wording which states that the staff code of conduct is included in the policy.
- Include reference to the safe recruitment policy.
- Clarify that the DSL's training contains the items listed in the Annex to KCSIE.
- Clarify that new staff and other adults working in the school receive induction training covering the safeguarding policy, the code of conduct, the role of the DSL, and the whistleblowing policy.
- Confirm that all staff and adults will be issued with Part 1 of the most recent version of KCSIE.
- Confirm that staff will be given appropriate training/guidance covering risks of radicalisation and extremism and how to identify pupils at risk.

- Provide details of how the school teaches pupils about safeguarding, especially e-safety and how to build resilience to risks of radicalisation.
- Indicate that boarding staff are alert to the increased risks of relationship problems and peer abuse in boarding.

### Implementation

- Ensure that staff are briefed on the required changes to the safeguarding policy.
- Ensure that all catering and peripatetic music staff receive appropriate updated safeguarding training.
- Ensure that the safe recruitment policy is brought up to date and refers to the missing required pre-appointment checks including:
  - checks of prohibition from teaching or management, and disqualification by association;
  - vetting checks for proprietors, volunteers or contractors.
- Ensure that the governors' annual review is efficient enough to identify any omissions in policy and practice, and that their board minutes refer explicitly to the process whereby they carried out their annual safeguarding review, and record formally that the board has discharged this statutory duty.
- Consider making clearer reference to responding to mental and emotional health issues.