

### **Report for an Additional Inspection**

School name	Clifton College				
DfE number	801/6000				
Registered charity number	311735				
Address	32 College Roa	ad			
	Clifton				
	Bristol				
	BS8 3JH				
Head Master	Mr Tim Greene				
Chair of governors	Mrs Alison Streatfield-James				
Number of pupils on roll	1245				
	Boys	702	Girls	543	
	Day pupils	854	Boarders	391	
	EYFS	102	Pre-prep	101	
	Prep	306	Sixth form	736	
Date of visit	17 January 2019				

### 1. Introduction

#### **Characteristics of the school**

1.1 Clifton College is an independent day and boarding school for pupils between the ages of two and nineteen years. Responsibility for governance is undertaken by an elected council. At the time of the visit, there were 1245 pupils on roll (543 girls and 702 boys), of whom 102 were in the Early Years Foundation Stage (EYFS), 407 in the pre-prep and prep departments and 736 in the upper school and the sixth form. The prep school has six day houses and two boarding houses. Of the eleven houses in the upper school, seven are boarding houses. Also, 391 pupils are boarders. The school has 167 pupils who require support for special educational needs and/or disabilities, of whom 2 have a statement of special educational needs or an education, health and care plan. Also, 435 pupils speak English as an additional language (EAL). The school's previous inspection was a focused compliance inspection with an educational quality inspection in February 2017.

#### Purpose of the visit

1.2 This was an unannounced additional visit at the request of the Department for Education (DfE) which focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs), the National Minimum Standards for Boarding 2015 and the requirements of the Early Years Statutory Framework.

Regulations which were the focus of the visit	Team judgements	
Part 3, paragraph 7 (safeguarding)	Not met	
Part 3, paragraph 8 (safeguarding of boarders)	Not met	
Part 3, paragraph 9 (behaviour)	Met	
Part 3, paragraph 10 (bullying)	Met	
Part 3, paragraph 14 (supervision)	Met	
Part 4, paragraphs 18-20 (suitability of staff, supply staff and proprietors)	Not met	
Part 4, paragraph 21 (single central register)	Met	
Part 6, paragraph 32 (provision of information)	Met	
Part 8, paragraph 34 (leadership and management)	Not met	

### 2. Inspection findings

# Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraphs 7 and 8; NMS 11; EYFS 3.4, 3.5 and 3.14]

#### Safeguarding policy

- 2.1 The school meets the requirements.
- 2.2 The school has an appropriate policy for safeguarding which provides suitable arrangements to safeguard and promote the welfare of pupils at the school.

#### Safeguarding implementation

- 2.3 The school does not meet all of the standards and requirements.
- 2.4 All members of staff and governors, including those with designated responsibility for safeguarding and those working with boarders, have appropriate levels of safeguarding training, attend regular update training and have a clear understanding of their safeguarding responsibilities. There is a named lead practitioner for safeguarding in the EYFS. Governors ensure that those with specific responsibility for safeguarding are given sufficient time and resources to carry out their roles effectively. Suitable arrangements are in place for the induction of new staff, which includes training in safeguarding. The nominated governor for safeguarding understands the role of effective liaison with the local children's safeguarding board. Scrutiny of records of most recent staff update training shows that there is a strong focus on peer-on-peer abuse and on the most recent update of Keeping Children Safe in Education 2018. A suitable code of conduct is implemented effectively and understood by all staff, which includes advice on e-safety and the appropriate use of social media. The staff code of conduct is integral to all safeguarding and child protection documentation. During interview staff reported that they felt confident with the school's whistleblowing procedures and that they would feel happy to make any referral directly to children's social services should the need arise. The school ensures that boarders are not discriminated against, paying particular regard to the protected characteristics set out in the Equality Act 2010, or because of their cultural background, linguistic background, special educational need, or academic or sporting ability.
- 2.5 The designated safeguarding leads and the nominated safeguarding governor, meet regularly to review safeguarding arrangements, including for the annual safeguarding review. However, procedures relating to the safer recruitment of staff do not follow statutory guidance. Recruitment procedures are not suitably rigorous and records show that staff are sometimes employed before all the necessary recruitment checks are undertaken prior to appointment. These include suitable references, checks against the barred list, a disclosure and barring service check (DBS) and appropriate checks on an employee's identity.

# Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 12; EYFS 3.4 to 3.7]

- 2.6 The school meets the standards and requirements.
- 2.7 The school has a suitable written behaviour policy, which clearly sets out the sanctions to be adopted in the event of pupils' misbehaviour. The policy is implemented effectively and suitable a record is kept of the sanctions imposed upon pupils for serious misbehaviour. The electronic record of incidents of pupil misbehaviour is suitably detailed and shows that any incidents are followed up appropriately and parents are kept informed of any incidents involving their child. In discussions pupils feel that the range of sanctions is appropriate and is applied fairly. The electronic system allows school leaders and mangers to have an effective overview of all behavioural matters. Governors monitor the occurrences of behavioural matters through a pastoral report that is generated and discussed at meetings.

# Welfare, health and safety of pupils – bullying [ISSR Part 3, paragraph 10; NMS 12; EYFS 3.4 to 3.7]

- 2.8 The school meets the standards and the requirements.
- 2.9 Bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy. The school's strategy includes an effective personal, social, health and education (PSHE) scheme of work that focuses on areas such as healthy and positive relationships, peer pressure, strengthening self-esteem, dealing with academic pressures and identifying and supporting mental health issues. Pupils, including boarders, benefit from a range of counselling support, a suitably trained mental health first aider and an in-house educational psychologist who is trained in cognitive behaviour therapy. The school counsellors also support the school's effective peer support programme, which is identified positively by the pupils as a source of support and guidance. Pupils and staff speak positively about the support that they are given through whole school meetings and through times when the main teaching timetable is suspended to enable a focus on specific areas, such as developing an anti-bullying culture across the school. The school's anti-bullying strategy has a clear focus on ensuring that there is no discrimination as set out in the Equality Act 2010. They understand that any banter surrounding these area is not acceptable. The school actively promotes areas, such as supporting LGBT pupils through specific assemblies and events to raise the profile of individual rights.
- 2.10 There is an effective programme to both educate and support pupils against cyber-bullying. Pupils understand the importance of staying safe on-line and they read and sign a user agreement. In discussions pupils state that incidents of bullying are rare but when they do occur they are always dealt with promptly and effectively by staff.
- 2.11 The school's electronic record of bullying incidents shows effective recording and follow up actions. Appropriate details are recorded of the incident. The record also indicates how parents are kept informed of any bullying incidents and then clearly sets out any subsequent sanctions or support required. The sanctions imposed suitably reflect the nature of the incident. Records show that these have included both internal and external exclusions. School leaders and managers, including governors, have effective oversight of any bullying concerns, which enables them to monitor incidents in detail and to identify patterns or trends. These systems may then, in turn, initiate additional foci for PSHE topics or external speakers.

# Welfare, health and safety of pupils – supervision [ISSR Part 3, paragraph 14; NMS 15; EYFS 3.64, 3.65]

- 2.12 The school meets the standards and the requirements.
- 2.13 The school ensures that pupils are properly supervised through the appropriate deployment of school staff. Scrutiny of duty rotas show that there are sufficient staff supervising pupils at all times of the school day, including break times and lunch times. The staff supervising boarders outside teaching time are sufficient in number, training and experience for the age, number and needs of boarders, and the locations and activities involved. Tutors and house parents work together to ensure there is an effective handover in the evenings. This also includes information on the known whereabouts of boarders. In discussions day pupils and boarders are confident that there is always a staff member nearby should they require any help or support.

# Suitability of staff, supply staff and proprietors [ISSR Part 4, paragraphs 18–21; NMS 14; EYFS 3.9, 3.11, 3.12 and 3.13]

- 2.14 The school does not meet all of the standards and requirements.
- 2.15 The school has a suitable safer recruitment policy in place. However, the policy is not implemented effectively. The school has not ensured that all necessary pre-employment checks are carried out before a person starts work at the school. There is currently no effective monitoring system to inform line mangers that all the required pre-employment checks have been carried out before employment commences. Since the previous inspection, missing pre-employment checks for some staff include: checking on the person's right to work in the UK, identity, qualifications, employment history and their medical suitability. For some staff, suitable checks against the barred list, DBS and prohibition from teaching were also not in place. The school has not always ensured that a suitable reference is in place from the staff member's most recent employer. Suitable checks have been carried out on supply staff and governors.
- 2.16 Details of all staff recruitment are suitably entered and stored on the school's single central register of appointments.

#### Provision of information [ISSR Part 6, paragraph 32; NMS 4]

- 2.17 The school meets the standards.
- 2.18 The school meets the requirements for providing information relating to safeguarding to parents. Particulars of the arrangements for safeguarding are published on the school's website. OR:

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

- 2.19 The school does not meet all of the standards.
- 2.20 Leaders and managers have appropriate levels of experience and demonstrate effective oversight and monitor any incidents of poor behaviour and bullying effectively and they ensure that there is appropriate provision for the supervision of pupils in place. However, they do not demonstrate good skills in fulfilling their responsibilities effectively to ensure that the independent school standards are met consistently. Safeguarding procedures, relating to the safer recruitment of staff, lack rigour. Leaders and managers, including governance, do not fully fulfil their responsibilities relating to monitoring oversight of checks to ensure the suitability of staff before they begin work at the school.

### 3. Regulatory action points

3.1 The school does not meet all of the requirements of the Education (Independent School Standards) Regulations 2014, National Minimum Standards for Boarding Schools 2015 and requirements of the Early Years Statutory Framework and should take immediate action to remedy deficiencies as detailed below.

#### ISSR Part 3, Welfare, health and safety, paragraphs 7 and 8; NMS 11

• Ensure that all checks are undertaken on staff before their commencement of employment, including references, barred list, prohibition from teaching and employment history, to reflect the requirements of Keeping Children Safe in Education 2018 [paragraph 7(a) and (b); paragraph 8(a) and (b); NMS 11]

#### ISSR Part 4, Suitability of staff, paragraph 18; NMS 14; EYFS 3.9

- Ensure that checks are undertaken to ascertain that all newly appointed staff have all the required preemployment checks [paragraph 18 (2)(a), (b), (c)(i-iii), (d), (f); NMS 14.1; EYFS 3.9].
- Ensure that there is a suitable process in place to prevent a person commencing employment before all the necessary checks are undertaken [paragraph 18.3; NMS 14.1; EYFS 3.9].

#### ISSR Part 8, Leadership and management, paragraph 34; NMS 13

- Ensure school leaders and managers have a more robust approach to, and closer scrutiny of, the staff recruitment process [paragraph 34 (1)(a), (b) and (c); NMS 13.3-13.5 and 13.8].
- Ensure pupils, including boarders, are effectively safeguarded by ensuring that pre-employment checks reflect any guidance issued by the Secretary of State [paragraph 34 (1)(a), (b) and (c) and NMS 13.3-13.5].

### 4. Summary of evidence

#### Written materials

Required for all visits

- Safeguarding policy
- Arrangements to educate pupils about safeguarding, including e-safety; bullying, taking responsibility for their own behaviour (to include PSHE schemes of work)
- Records of staff training with particular reference to safeguarding, bullying and the promotion of good behaviour
- Code of conduct for staff
- Anti-bullying policy
- Staff recruitment policy
- Single central register of appointments
- Boarding handbooks
- Copies of governor meeting minutes where pupil behaviour was discussed
- Copies of governor meeting minutes where bullying was discussed
- Copies of governor meeting minutes where a review of safer recruitment practices was undertaken
- Log of behavioural and bullying incidents
- Log of serious sanctions and evidence of monitoring
- Rotas for the supervision of pupils, including boarders
- DSL's review of the recruitment process

#### Meetings with school personnel

- Introductory meeting with head to discuss arrangements for the day and to provide initial thoughts on areas specified as focus for the visit
- Meeting with the DSL to discuss implementation of safeguarding policy, training and induction of new staff
- Meeting with person responsible for carrying out staff recruitment checks to review school's recruitment procedures, to scrutinise single central register of appointments and to check staff recruitment files
- Meeting with head of boarding to discuss behaviour, bullying and supervision of boarders
- Meeting with senior leader in charge of pastoral matters to discuss behaviour, bullying and supervision of pupils
- Feedback meeting with head and member of Council

#### Activities on site

- Further scrutiny and evaluation of implementation of policies and documentation (as detailed above)
- Interviews with pupils, including boarders, in Years 9 and 13 chosen by inspectors
- Interview with pupils from the school's Jewish community, chosen by inspectors
- Interview with group of staff, including teaching and non-teaching, chosen by inspectors
- Interview, by telephone, with a member of the school's governing body