

## Repton School

Repton School, The Hall, Repton, Derbyshire, DE65 6FH

**Date of visit** 21 January 2015

### Purpose of visit

This was an unannounced visit carried out at the request of the DfE, to focus on the compliance of the school with the Independent School Standards Regulations (ISSRs) and the National Minimum Standards for Boarding (NMS), particularly, those concerned with:

- Safeguarding/child protection: management and referral of allegations (both pupil-on-pupil and staff-on-pupil), policy and its implementation;
- recruitment checks on staff;
- pupils' welfare, health and safety, including supervision (day, evening and weekends) support and medical care for boarders and sensitivity to those with different needs; contact with boarders' parents;
- access to boarding accommodation and provision of social areas, arrangements for free time and activities in boarding;
- measures to promote good behaviour and to promote good relationships in boarding, and the schools success in implementing them; effectiveness of processes for applying and recording serious sanctions; effectiveness of measures to ensure suitable supervision of pupils, including in boarding;
- the role of prefects in boarding;
- the opportunities for boarders to raise concerns and the handling of those concerns, including the effectiveness of measures in relation to perpetrators and victims where allegations relate to bullying or other incidents of a child protection nature;
- the effectiveness of governors' oversight of safeguarding arrangements and incidents; leadership and management, including of boarding.

### Characteristics of the School

Repton School is a co-educational boarding and day school for pupils aged 13 to 18 about 4 miles outside Burton-on-Trent, in Derbyshire. There are 656 pupils, roughly equally made up of boys and girls, of whom two-thirds are boarders; most pupils are white British, with 14 nationalities represented in boarding. Boarding houses are spread through the village. 147 pupils have special educational needs and/or disabilities (SEND); one has a statement of special educational needs; 42 have English as an additional language (EAL) of whom 19 receive support. The school is a charitable trust, overseen by a board of governors. At the time of the visit the school was led by the acting head, previously deputy head, pastoral. The acting head took up this post at the beginning of December 2014. The previous inspection was in March 2014.

## Inspection findings

### **Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraphs 7 (a) and (b) and 8 (a) and (b); NMS 11]**

The school does not meet the regulations.

The school's arrangements do not provide appropriate support for pupils' needs.

The safeguarding policy, provided to parents on the school website and in active use, dated September 2014, identifies the need to safeguard children at risk of harm but provision for those in need is limited. It shows concern for pupils but some items required by statutory guidance are omitted, as outlined below. During the visit, the school provided a copy of a revised policy, due to be presented to governors for approval, which corrected several omissions, including provision for children who are in need.

Both versions of the policy acknowledge guidance from the Local Safeguarding Children Board (LSCB) and makes suitable references to statutory guidance, including Keeping Children Safe in Education 2014 (KCSIE). Child protection procedures are supported by a staff code of conduct. This gives useful advice to staff and covers many areas relevant to the school, but it is insufficient in the guidance given to staff about being alone with pupils, including in vehicles. This guidance is included in the most recent revision of the child protection policy. The child protection policy outlines some elements of the school's recruitment procedures but not all. The separate staff recruitment policy is appropriate but is not currently implemented comprehensively in practice.

The safeguarding policy includes limited definitions of abuse which do not match those published in KCSIE. Definitions in the revised policy remedy this shortcoming. The policy does not provide appropriately for the handling of allegations of abuse by one pupil against another because it does not state clearly that reference must be made to external agencies where it is considered that a child may be in need of support or there is or may be a risk of significant harm. It also links pupil-on-pupil abuse to allegations against adults working in the school. The revised policy removes this link and identifies both the perpetrator and victim as potentially being at risk in such cases but still does not recognise the need to refer such abuse to an external safeguarding agency.

Discussion with the DSL and evidence from child protection records identifies that the DSL does take action in response to the early signs of abuse and neglect, keeps clear records, and listens to the views of pupils. However, pupils have not always received the right help at the right time to reduce risks and prevent issues escalating. When situations have not improved, or full information has not been shared with external agencies, and where there has been inaction by senior leaders, this has not been challenged by the DSL or any other individual, as required by KCSIE.

Arrangements for listening to children provide that boarders are able to raise concerns, to be listened to and supported effectively. All boarders interviewed confirmed this and staff interviewed showed suitable awareness of their responsibility to listen to pupils and take action. The school provides appropriate, extensive guidance to pupils about sexual relationships, alcohol misuse and e-safety, and this is monitored to ensure effectiveness. Pupils showed understanding of appropriate boundaries of sexual conduct, including for those under the age of 16. Staff interviewed by inspectors showed similar understanding, but this has not always informed the school's actions in the past. The safeguarding policy identifies some elements of safeguarding listed in KCSIE but omits others that are relevant to the context of the school: these include its boarding provision, in particular relationships in boarding; the potential for abuse by peers; and the potential dangers of alcohol misuse,

given the school's provision of a sixth form bar, and of drug abuse. The revised policy does not rectify these omissions.

The safeguarding policy shows limited awareness of the procedures of the local children's services, Derbyshire. It guides staff as to what to do if they have concerns and requires immediate reporting to the DSL. It states that staff must not ask leading questions or promise confidentiality to pupils. Staff confirmed in interviews that they understand these requirements and records show that staff report concerns to the DSL promptly. Reference is made to LSCB procedures. Neither the policy nor its revision states clearly that anyone can make a referral, instead limiting such provision to staff. The policy confirms that the DSL will work closely with local agencies but does not clearly require prompt referral because it appears to require concerns to be channelled through the head. The policy does not give contact details for local agencies other than the LADO. While this is not required by the statutory guidance, it could hinder effective implementation of the arrangements in practice. The revised policy corrects these omissions and requires prompt referral by the DSL to children's services and provides contact details for children's services.

The school does not always ensure that parents are kept informed of their child's involvement in serious incidents, whether as alleged perpetrators or victims. They have not ensured that parents are always kept informed when allegations are made against a pupil.

The policy provides for dealing with allegations of abuse against staff, volunteers and the DSL. It makes clear that any allegations must be made to the head. In interviews, staff confirmed understanding of these arrangements. The policy states that the police will be informed from the outset in cases of serious harm. The policy does not state clearly that the head must contact the LADO immediately, suggesting some form of investigation may take place; contact details are given. The revised policy corrects this omission. Any allegation against the head must be made to the chair of governors although the policy does not state that this must be without the head being informed, nor is this corrected in the revised policy. Records show that the school already implements the provisions of the revised policy effectively.

The policy provides for reporting any person whose services are no longer used where referral criteria are met to the Disclosure and Barring Service (DBS) or the National College for Teaching and Learning (NCTL). No occasion has arisen recently for this to be necessary and the school confirmed to inspectors that it understands the importance of following the LADO's advice in this regard should such a situation arise.

Overall, safeguarding has not been correctly managed in the school. The safeguarding policy names an individual to take responsibility for child protection matters (the DSL), together with an alternative person in the absence of the DSL. This figure has sufficient status and authority to act independently. However, the requirement in the policy to report such matters to senior leaders and the decision of senior leaders to handle them personally limited independence and undermines the policy's effectiveness. Evidence shows that on occasion, a senior leader interviewed pupils involved in serious incidents without any other staff present and without systematic notes, other than a 'file note', being taken. On other occasions suitable interviews and discussions took place on the school's initiative. The failure to follow proper procedures in all instances has resulted in ineffective management of some safeguarding incidents.

The safeguarding policy identifies a governor to liaise with senior leaders regarding safeguarding. The policy requires that any deficiencies or weaknesses in child protection arrangements are remedied without delay, and provides for annual review by the governors. Governors receive regular reports at each board meeting about child protection matters

although the detail is not minuted. The deficiencies in the published policy and its outdated nature suggest that review is not sufficiently effective.

Safeguarding training is required for all staff including volunteers and temporary staff on induction and thereafter. Induction training is provided for appropriately. The contents of training are suitable and comprehensive records are kept of training which enable any staff who were absent to be identified, and additional training events are arranged for them. Training is up to date, including for the DSL. In interviews, staff showed effective understanding of the training they have received. The training identified for the DSL in the policy includes inter-agency training, but the policy does not specify that it must take place every two years. This is corrected in the revised version. The policy does not clearly require the head to receive training alongside other staff although this has taken place in practice.

The safeguarding policy makes limited provision for boarding. It makes suitable provision for alternative accommodation if a member of the boarding staff is suspended in circumstances of a child protection nature. However, it does not identify particular risks associated with boarding, for example that boarders may be particularly vulnerable in residential settings and that staff should be alert to pupil relationships and the potential for peer abuse. This omission is not rectified in the revised version. In interviews, staff showed suitable awareness of the potential for such abuse. Evidence shows that staff report relevant concerns promptly but that these have not always been responded to appropriately from that point.

#### **Welfare, health and safety of pupils – boarders’ health and well-being [NMS 3]**

The school meets the regulation with regard to respecting the confidentiality and rights of boarders appropriately.

Pupils have access to appropriate medical and health care at evenings and weekends through the medical centre. Suitable protocols operate to assess Gillick competence and these are effectively implemented in medical treatment.

#### **Welfare, health and safety of pupils – contact with parents in boarding [NMS 4]**

The school meets the regulation.

The school ensures that boarders can contact their parents with ease.

#### **Welfare, health and safety of pupils – boarding accommodation [NMS 5, especially 5.1, 5.2, 5.5 & 5.7]**

The school meets the regulation.

The school provides suitable social areas for pupils, including in the sixth form. These are appreciated by pupils and include, for sixth formers, the ‘JCR’, a common room area with a bar. This serves alcohol only to those over 18 and the facility is supervised by staff at all times. In the past, arrangements have been made for those aged between 16 and 18 to be served alcohol under clearly laid-out conditions, in particular, a requirement that they eat a substantial meal. This arrangement no longer operates and under-18s are not permitted to obtain alcohol. Evidence does not indicate that this system was ineffective in the past. Although some pupils may have been served alcohol when they had earlier consumed alcohol elsewhere, there is no evidence that this was because of negligence. Pupils are always required to ‘sign-in’ at their house before going to the JCR and their physical state is assessed by staff. A ‘chit’ system limits pupils to two alcoholic drinks only in the JCR. A can

of beer or a can of cider or a small glass of wine qualifies as one drink. Spirits are not served and mixing of drinks is not permitted. Access to soft drinks is not limited.

Access to boarding accommodation is suitably controlled and monitored. In interviews, both staff and pupils confirmed that pupils of the opposite sex are not allowed in the upper floors of houses.

**Welfare, health and safety of pupils – the safety of boarders [ISSR Part 3, paragraph 11; NMS 6]**

The school meets the regulations.

Appropriate steps are taken to ensure the health and safety of pupils in operating the sixth form bar. Suitable protocols exist for the consumption of alcohol, which the school operates effectively. Where pupils misuse alcohol the school takes appropriate and commensurate action in accordance with its behaviour policy. Suitable sanctions are applied. Pupils are given guidance on the dangers of alcohol abuse, and the school policies on alcohol consumption, in PSHE. These messages are reinforced through assemblies and in the houses.

**Welfare, health and safety of pupils – the promotion of good behaviour, including promoting positive relationships in boarding [ISSR Part 3, paragraph 9; NMS 12:]**

The school does not meet the regulations.

The school has an appropriate policy to promote good behaviour but implementation is not effective because sanctions have not always been operated consistently and parents are not always informed of serious behavioural incidents, as the school policy requires.

No reference is made in the school's behaviour policy to non-statutory advice provided by the DfE although the policy reflects some of the elements in the most recent guidance. It gives guidance to staff on the rewards and sanctions to be adopted in the event of pupil misbehaviour. This includes suitable sanctions. In interviews, staff showed clear understanding of these arrangements and how to implement them.

More serious sanctions, including expulsion, are provided for repeated breaching of the rules regarding alcohol and smoking. Expulsion is also stipulated for possession of illegal substances. Intimidation, offences of a sexual nature and serious misconduct towards a member of the school community are identified under 'serious issues' which would lead to suspension or expulsion. Evidence shows that senior leaders have not always applied these sanctions consistently; in some cases sanctions were not applied following the admission of serious misbehaviour by pupils.

Reference is made to an anti-bullying policy but this does not provide that when peer-to-peer issues involve risk of significant harm, reference will be made to external agencies. The policy makes no provision for considering the particular needs of pupils, for example those with SEND, in applying sanctions.

The policy makes no provision for sanctions to be logged or that those imposed by housemasters be communicated to senior staff. It does not include provision for senior staff to retain records of serious sanctions and for these to be monitored to identify patterns or trends. Sanctions are logged effectively in practice and senior staff regularly monitor records, including logs of sanctions given in boarding houses. Governors are informed of serious disciplinary matters by the head at governors' meetings but this information is not recorded in detail in governors' meetings minutes.

The policy does not indicate how the school liaises with parents about any poor behaviour or when any serious infringement of the school rules occurs. Evidence shows that parents have not always been informed when such incidents occur.

**Welfare, health and safety of pupils – ensuring proper supervision of pupils, including in boarding [ISSR Part 3, paragraph 14; NMS 15]**

The school meets the regulations.

Suitable arrangements are implemented to supervise pupils. These include supervision at break times during the school day and in boarding. Sufficient numbers of suitably trained staff are on duty in boarding houses, including at night. Boarders are always under the responsibility of suitably trained staff, including in the JCR. Signing in and out procedures ensure that their whereabouts are known or can be ascertained. This may include signing out with permission to go into the village at appropriate times. Boarders are required to sign into their house at 9.00 p.m. on a Saturday prior to visiting the JCR. Boarders have satisfactory means of contacting a member of staff at all times should they need to. Staff accommodation is suitably separated from that of boarders and adults living in boarding accommodation have clear roles and responsibilities.

**Arrangements for prefects [NMS 19]**

The school meets the regulation.

The school appoints school and house prefects who have appropriate specific duties and responsibilities. There is adequate staff supervision and measures to counter possible abuses of the role. The only role played by prefects in the operation of the sixth form bar is that house prefects hand out individuals' account cards, on which their purchases of food and drink are recorded by staff. The bar is operated by senior staff who ensure that no pupil under 18 has an alcoholic drink and pupils over 18 do not receive more than two alcoholic drinks.

**Suitability of staff [ISSR Part 4, paragraphs 18-21; NMS 14]**

The school does not meet the regulations.

The school's recruitment policy is not implemented properly. As a result not all the required checks are suitably recorded on the SCR.

All recent appointments have included appropriate DBS checks and most other checks are undertaken and recorded efficiently on the SCR. Suitable arrangements are implemented to check those over 16 who live on the premises but are not employed by the school. However, in some recent appointments, where staff have begun work before DBS checks have been seen, a separate barred list check has been obtained, but associated risk assessments and supervision arrangements have not been confirmed in writing or regularly updated. Recent appointments have not included checks against the prohibited list for all staff involved in teaching. In some instances, non-teaching staff have begun work before sufficient references have been obtained.

## **Arrangements for activities and free time in boarding [NMS 10.1 ]**

The school meets the regulation.

The school provides an appropriate range and choice of activities for boarders outside teaching time. This includes sufficient and suitably timed free time each day. A suitable range of activities is arranged in the evenings and weekends. All boarders who were interviewed commented that they enjoy the range of activities provided and the opportunity to relax at weekends.

## **Governance, Leadership and management, including in boarding [ISSR Part 8; NMS 13]**

The school does not meet the regulation.

The governors have not ensured that those with leadership and management responsibilities successfully promote the well-being of pupils. The management of safeguarding has not been implemented effectively because senior leaders have not consistently managed allegations and concerns according to the school's published arrangements or fully in line with LSCB procedures. Records of interviews have not been kept effectively. Outcomes of investigations of child protection incidents have not been fully communicated to external agencies. Relevant parents have not been fully informed of incidents. Governors have now ensured effective scrutiny of the management of these incidents but limited record keeping hindered such scrutiny in the past.

## **Regulatory action points**

### **Compliance with regulatory requirements**

The school does not meet several of the Independent School Standards Regulations (ISSRs) 2014, and the requirements of the National Minimum Standards for Boarding and therefore it is required to take the following action.

### **Welfare, health and safety of pupils [ISSRs Part 3, paragraph 7 (a) and (b) and 8 (a) and (b); NMS 11]:**

1. To improve the communication, wording and implementation of the safeguarding policy, it requires the following amendments.
  - Ensure that all reporting lines and timescales are clearly stated including that any allegation against the head must be made to the chair of governors without the head being informed;
  - Ensure that the policy makes clear that contact details for local agencies are provided for any staff, parent or other persons to use [that is, anyone, not just staff, can make a referral].
  - Ensure that pupils receive the right help at the right time to reduce risks and prevent issues escalating. In particular, that the DSL challenges any inaction by senior leaders, or when situations do not improve, or full information is not shared with external agencies.
  - Ensure that the school's actions are consistently informed by understanding of appropriate boundaries of sexual conduct, including for those under the age of 16.
  - Strengthen the identification of elements of safeguarding in the school's policy by including those relevant to the context of the school, particularly:

- boarding provision, awareness of relationships in boarding and the potential for abuse by peers;
  - the potential dangers of alcohol misuse, given the school's provision of a sixth form bar, and of drug misuse.
- With the support of informed advice from an external safeguarding agency, follow relevant statutory guidance concerning working with and sharing information from parents regarding their child's alleged involvement in serious incidents of pupil-on-pupil abuse, whether as perpetrators or victims.
  - Make clear that, when there are allegations of abuse by one pupil against another, there will be referral of such abuse to an external safeguarding agency.
  - Specify that whole-school training in child protection is provided for all staff including the head.
  - Improve the management of safeguarding by ensuring that:
    - when senior leaders interview pupils involved in serious incidents another member of staff or adult is always present;
    - that systematic notes of the interview are kept.
  - Improve the staff code of conduct in relation to guidance given to staff about being alone with pupils; stress the need to avoid giving a lift in a car to a single pupil, in line with guidance in the revised safeguarding policy.
2. Ensure that the safeguarding policy provided to parents is the most up-to-date version.
  3. Ensure that references are obtained and verified before any staff begin work.
  4. Confirm risk assessments and supervision arrangements in writing when staff begin work before DBS checks have been seen, and a separate barred list check has been obtained, and update these every fortnight.
  5. Ensure that the governing body conducts an effective and comprehensive annual review of the school's safeguarding arrangements.

**Welfare, health and safety of pupils – the promotion of good behaviour, including promoting positive relationships in boarding [ISSR Part 3, paragraph 9; NMS 12;]**

6. Implement the school's provision for serious sanctions consistently.
7. Ensure that parents are always informed of serious behavioural incidents.

**Suitability of staff [ISSR Part 4, paragraphs 18 (2) (b); NMS 14]**

8. Ensure that all staff involved in teaching, whether full or part time, are checked against the list of those prohibited from teaching.

**Governance, Leadership and management, including in boarding [ISSR Part 8; NMS 13]**

9. Strengthen governance, leadership and management to promote the well-being of pupils by ensuring that:
  - the management of safeguarding is consistent and effective;



- allegations are managed according to the school's published arrangements, and fully in line with LSCB procedures;
- record keeping is rigorous and consistent;
- information relevant to child protection is always communicated in full to external agencies.