



**ISI** Independent  
Schools  
Inspectorate

**Material Change Inspection Report**

**Rochester Independent College**

**October 2022**

## School's details

<b>College</b>	Rochester Independent College			
<b>DfE number</b>	887/6004			
<b>Address</b>	Rochester Independent College 254 High Street St Margaret's Banks Rochester Kent ME11HY			
<b>Telephone number</b>	01634 828115			
<b>Email address</b>	admissions@rochester-college.org.uk			
<b>Principal</b>	Mr Alistair Brownlow			
<b>Proprietor</b>	Dukes Education Limited			
<b>Age range</b>	11 to 21			
<b>Number of pupils on roll</b>	357			
	<b>Day pupils</b>	224	<b>Boarders</b>	133
	<b>Lower School</b>	174	<b>Sixth Form (16 – 21)</b>	183
<b>Date of inspection</b>	19 October 2022			

## 1. Introduction

### Characteristics of the school

- 1.1 Rochester Independent College is an independent, co-educational day and boarding school for pupils aged 11 to 21, situated in the centre of Rochester in Kent. Boarding is available for those aged 13 and over, accommodated in five houses. Founded in 1984, the school has grown from being accommodated in one terraced house to occupying a site of two acres with 18 buildings. In 2016 the school joined Dukes Education Limited, which provides oversight, assisted by governors associated with that group.
- 1.2 The school is divided into the lower school for Years 7 to 11 and the sixth form. An additional 'Year 14' cohort follows one-year intensive A-level courses or retakes A-level examinations. The number of pupils identified by the school as having special educational needs and/or disabilities is 132 (SEND). There are 44 pupils who have an education, health and care plan and 115 pupils have English as an additional language.

### Purpose of the inspection

- 1.1 This was an announced material change inspection at the request of the Department for Education (DfE) to assess the school's proposal to increase capacity from 360 to 380. The inspection focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs) and the National Minimum Standards for Boarding 2022.

Regulations which were the focus of the inspection	Team judgements
Part 1, paragraphs 2 (curriculum), 2A (relationships and sex education), 3 (teaching)	<b>Met</b>
Part 2, paragraph 5 (spiritual, moral, social and cultural development of pupils); NMS 17	<b>Met</b>
Part 3, paragraphs 7 (safeguarding) and 8 (safeguarding of boarders); NMS 8	<b>Met</b>
Part 3, paragraph 9 (behaviour); NMS 15	<b>Met</b>
Part 3, paragraph 10 (bullying); NMS 16	<b>Met</b>
Part 3, paragraph 11 (health and safety); NMS 9	<b>Met</b>
Part 3, paragraph 12 (fire safety); NMS 10	<b>Met</b>
Part 3, paragraph 14 (supervision of pupils); NMS 20	<b>Met</b>
Part 3, paragraph 16 (risk assessment); NMS 9	<b>Met</b>
Part 4, paragraphs 18 to 21 (suitability of staff, supply staff and proprietors); NMS 19	<b>Met</b>
Part 5, paragraphs 23 to 30 (premises of and accommodation at	<b>Met</b>

schools); NMS 4	
Part 6, paragraph 32(1)(c) (provision of information)	<b>Met</b>
Part 7, paragraph 33 (manner in which complaints are handled); NMS 14	<b>Met</b>
Part 8, paragraph 34 (leadership and management); NMS 2	<b>Met</b>

## 2. Inspection findings

### **Quality of education provided – curriculum, relationships and sex education (RSE) and teaching [ISSR Part 1, paragraphs 2, 2A, and 3]**

- 2.1 The school meets the standards.
- 2.2 The curriculum is suitably documented, supported by appropriate plans and schemes of work for teaching and covers the required breadth and depth of material. Curriculum arrangements include effective provision to meet the individual needs of all pupils, including those with SEND. The curriculum for older pupils caters suitably for aspiring medics and vets as well as providing scope to retake a range of A-level subjects. Teaching ensures arrangements are implemented appropriately and that pupils make good progress. Behaviour management in lessons is effective. The school has a suitable plan for pupils' personal, social and health and economic education (PSHEE). This includes guidance on dangerous substances including smoking. The scheme of work meets all of the requirements of statutory guidance for relationships and sex education. The policy for relationships and sex education (RSE) is available to parents on the school's website. In drawing up the policy and scheme of work the school has consulted pupils, parents and staff and taken their views into consideration. The programme is designed so that topics are revisited in subsequent years in order to build up deeper understanding. The RSE and PSHEE programmes are taught in discrete lessons as part of the regular timetable throughout the year. Years 12 to 14 experience PSHE as a 'drop-down' day featuring external speakers and online activities at least once every half term. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

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

- 2.3 The school meets the standards.
- 2.4 The school's PSHEE and RE programmes are implemented effectively to ensure that all pupils receive suitable guidance to support their personal development. There is an appropriate focus on citizenship and the promotion of fundamental British values throughout the school. The school encourages respect, tolerance and empathy towards the needs of others, encompassing all those with protected characteristics including race, gender and sexual identity. This was evident in positive interactions observed between pupils, and between staff and pupils. In discussion, pupils articulated their understanding that rules are necessary to ensure equality and fairness within society, including decision making in the justice system. They described how racism and discrimination existed historically but are unacceptable now. Pupils outlined that they explore sustainability and current affairs and how this helps their understanding of different cultures and the needs of a diverse world. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

### **Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraph 7 and 8; NMS 8]**

#### **Safeguarding policy**

- 2.5 The school meets the requirements.
- 2.6 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**

- 2.7 The school meets the standards.
- 2.8 Scrutiny of records together with discussions with pupils and staff indicate that appropriate safeguards are in place. The school implements its safeguarding policy effectively. Pupils stated confidently that they know how to stay safe, including online. They confirmed that they can talk to staff if they are worried or concerned, will receive a response and that action will be taken when they express concerns.
- 2.9 Those responsible for safeguarding hold senior positions within the school. They are suitably knowledgeable and appropriately trained, including for multi-agency working. Key information is shared regularly between safeguarding, pastoral and healthcare staff, taking into account each individual pupil's physical, psychological and learning needs and wishes. This information is used to agree appropriate action, including the drawing-up and implementation of individual support plans. Such action includes appropriate steps to deal with any incidents of inappropriate sexual behaviour, including sexual harassment and/or sexual violence. There is effective liaison with external agencies including referral to Child and Adolescent Health Services (CAMHS) and the local authority designated officer (LADO) for safeguarding. Arrangements take into account effectively the extended age range of pupils in the school. Training for other staff and for governors is conducted regularly as required. It is effective and includes informal updates.
- 2.10 Staff are knowledgeable about changes in recent legislation including the management of children's mental wellbeing, contextual safeguarding, child-on-child abuse, sexual harassment and sexual violence. They understand the principles underpinning the staff code of conduct and the procedures for making a referral, including the importance of low-level reporting and whistleblowing. Senior leaders take appropriate action if any perceived breach of the staff code of conduct occurs. They understand their responsibility to make referral to relevant statutory bodies once investigations by external agencies are completed. They fulfil this effectively.
- 2.11 The board lead responsible for safeguarding meets regularly with the designated safeguarding lead (DSL) and deputies and maintains effective oversight of safeguarding policies and their implementation. Reports are given regularly to the board so that they are well informed. These highlight appropriate details of any safeguarding incidents and the designated safeguarding governor reviews these effectively. This ensures that the board provides effective scrutiny and oversight on behalf of the proprietor, including of the use of technology. In addition to continuous monitoring, a suitable annual review of safeguarding is undertaken in line with guidance from the local authority. There are sufficient numbers of trained deputy safeguarding leads and other staff to cater for the proposed increase in the number of pupils.

### **Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 15]**

- 2.12 The school meets the standards.
- 2.13 A suitable written behaviour policy is implemented effectively and clearly sets out the sanctions to be adopted in the event of pupils' misbehaviour. An appropriate record is maintained of positive and negative notifications, including in boarding, as well as sanctions for serious misbehaviour. This provision reinforces a culture where sexual harassment and online sexual abuse are not tolerated. The school's electronic system enables staff to record all behaviour issues. Inspection scrutiny of these records shows there is a clear oversight of recorded incidents of poor behaviour. Information from the records informs pupil behaviour management plans, resulting in appropriate actions such as interventions. The records are regularly monitored by senior managers to identify patterns. Pupils during discussion commented that they are fully aware of the school rules and sanctions system. They

perceive the system to be fairly administered, including in boarding, and inspection evidence supports this view. Pupils observed when moving around the school were polite, courteous and conducted themselves in a responsible manner. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

### **Welfare, health and safety of pupils – bullying [ISSR Part 3, paragraph 10; NMS 16]**

- 2.14 The school meets the standards.
- 2.15 The school gives suitable guidance to pupils about bullying and appropriate training to staff. Pupils understand the different types of bullying, know when and how to seek help, and that they should report any bullying they observe. Similarly, staff receive effective training about bullying. When pupils report concerns, these are attended to promptly, with support given to both the victim and the perpetrator. These measures include appropriate action where any elements of bullying could be considered name calling or physical assault and provide for care for any pupils whose mental health may be affected by bullying. Staff are aware of the seriousness of bullying and the need to refer to the DSL any incidents they consider serious. The school logs all bullying incidents in a central record kept by the school senior leaders. The central log is reviewed regularly to identify any trends, with appropriate action taken to address these. As a result, pupils are confident that if any incidents take place staff are prompt to intervene and help sort them out. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

### **Welfare, health and safety of pupils – health and safety [ISSR Part 3, paragraph 11; NMS 9]**

- 2.16 The school meets the standards.
- 2.17 The school has an appropriate policy in place for health and safety which is reviewed and updated regularly and implemented consistently. All aspects of health and safety are monitored regularly by senior leaders and governors on behalf of the proprietor. The roles and responsibilities of staff and governors are stated clearly and there is appropriate delegation of duties and training. Maintenance staff know the site well and are aware of potential risks and hazards. The school has a comprehensive asbestos management plan and appropriate measures are in place for the control and storage of hazardous substances (COSHH). The maintenance recording system is used effectively by maintenance staff in order to prioritise work schedules and respond to emergencies without delay.
- 2.18 The health and safety committee monitors health and safety effectively. Those responsible for day-to-day operations provide detailed reports. These include the completion of required maintenance logs and records of work carried out by internal maintenance staff and contractors. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

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

- 2.19 The school meets the standards.
- 2.20 The school has a suitable fire risk policy which is reviewed and updated annually. The school's fire risk assessment is undertaken by a suitably qualified person. It is reviewed regularly, and any recommendations are implemented without delay. Appropriate fire safety procedures are implemented including for boarding houses. Competent persons have been appointed to assist in taking preventative and protective measures including ensuring that all parts of the buildings can be evacuated if there is a fire. Regular and suitable training is in place for staff and for those with responsibilities including fire wardens.

2.21 Staff, pupils and visitors are provided with appropriate fire safety information including how to evacuate buildings and where the fire assembly points are located. Termly fire drills are conducted at different times of the day and night. These are recorded accurately including the time it takes for evacuation and any concerns and improvements that need to be made. Suitable emergency exits, escape routes and signage are in place, including for boarding houses. Effective monitoring systems are in place to ensure that these are maintained consistently to the required standards. Fire equipment including extinguishers and alarms are checked regularly by external contractors. Records of all fire safety checks are maintained appropriately and monitored by governors as part of the role of the health and safety committee. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

### **Welfare, health and safety of pupils – supervision of pupils [ISSR Part 3, paragraph 14; NMS 20]**

2.22 The school meets the standards.

2.23 The school has a suitable policy for supervising pupils which is implemented effectively. Staff receive appropriate guidance on induction and this is maintained through regular updates. Staff have clear job descriptions detailing their duties with regard to supervision, including in boarding. Comprehensive duty rotas cover all areas of the school. Arrangements for different times of day take into account the age, number and needs of pupils and the locations and activities involved. These are all implemented effectively. The school has sufficient numbers of suitably trained staff who pupils can talk to should they require assistance, including in boarding. Monitoring by senior staff ensures that supervision is effective, and that cover is put in place without delay if it is required. The current arrangements are likely to meet the needs of the proposed increase in pupil numbers.

### **Welfare, health and safety of pupils – risk assessment [ISSR Part 3, paragraph 16; NMS 9]**

2.24 The school meets the standards.

2.25 There is a suitable policy and procedures with regard to risk assessment and the reporting of accidents and near-misses including, where appropriate, to the regulatory body. These are recorded electronically and monitored effectively by the health and safety committee during their termly meetings. There are clear lines of responsibility for assessing risk. Departmental heads, including those responsible for boarding houses, oversee risk assessments in their departments and the human resources manager and DSL monitor those for off-site trips. Individual care plans include the assessment of risk for vulnerable pupils. Appropriate risk assessments are in place for boarders' sleeping accommodation and for all areas of the boarding houses. Risk assessments are reviewed regularly, and appropriate action taken where required to reduce risk.

2.26 The policy for off-site visits is detailed and clear with helpful information about identifying risk assessments that are required. Parents are suitably informed of arrangements for school trips including behaviour expectations, safeguarding procedures, activities and travel details. Risk assessments are amended if changes occur and any changes to arrangements are communicated to parents without delay.

2.27 Staff confirmed that they had received training regarding the completion of risk assessments and that they are confident in completing them including for boarding, trips and hazardous activities. Risk assessments seen include those for boarding houses. They were comprehensive, dated and signed off by senior members of staff. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.



### **Suitability of staff, supply staff and proprietors [ISSR Part 4, paragraphs 18 to 21; NMS 19]**

- 2.28 The school meets the standards.
- 2.29 There is a suitable recruitment policy implemented which covers the required recruitment checks and procedures. All staff, governors and persons engaged in regulated activity are recorded on the single central register of appointments (SCR). Those responsible for carrying out the required recruitment checks and the maintenance of staff records ensure that checks and evidence are in place prior to commencing work in the school. Appropriate procedures are in place for managing contractors including ensuring that they are accompanied at all times if not checked by the school.
- 2.30 Persons over 16 living in boarding premises are appropriately checked. Suitable written agreements are in place between the school and any person over 16 not employed by the school but living in the same premises as the pupils. All persons visiting the boarding houses are appropriately monitored. They are required to register with the school office and be accompanied at all times. Visitors are not allowed to enter boarders' sleeping accommodation. The school does not appoint guardians but where parents have appointed private guardians the school monitors such arrangements from a safeguarding perspective. Arrangements are likely to continue to meet requirements with the proposed increase in pupil numbers.

### **Premises and accommodation – [ISSR Part 5, paragraphs 23 to 30; NMS 4]**

- 2.31 The school meets the standards.
- 2.32 Suitable policies and procedures are in place to ensure that the school premises and accommodation and facilities are maintained to a standard where the health, safety and welfare of pupils is ensured as far as possible. Suitable living accommodation is provided for boarders enabling them to study and socialise outside of school hours. There is appropriate separation between genders, age groups and between boarders' and staff accommodation. A range of suitable furnishings have been purchased taking into account the size, number, needs and ages of boarders accommodated. Boarders are encouraged to care for and personalise their spaces with suitable posters and personal items.
- 2.33 The school, including boarding houses, provides suitable toilet, washing facilities, showers and changing accommodation for the sole use of pupils. These are located in the vicinity of the sleeping accommodation. There are designated facilities for male, female and gender-neutral pupils. Toilet and washing facilities provide appropriate privacy. Suitable disabled facilities are available for staff and visitors.
- 2.34 Suitable accommodation is provided for the medical examination and treatment of pupils and for the short-term care of sick or injured pupils in boarding houses and in the school's well-equipped health centre. The accommodation is near to toilets and bathroom facilities and is adequately staffed.
- 2.35 Boarding accommodation is reserved for the use of those boarders designated to use it. Electronic systems enable boarding staff to continuously monitor entry and exit to the boarding houses. All visitors are required to sign into the main office and are accompanied at all times. Lighting to the footpaths has been increased to improve further the safety and security of those walking around the school site.
- 2.36 Boarding houses and teaching accommodation have been constructed in accordance with the required acoustic and lighting regulations. Records of appropriate tests and certificates are maintained. Drinking water is clearly labelled and is available in all kitchen areas. Adequate cold water is supplied to toilet and shower facilities. Tap and shower temperatures are suitably tested and records maintained. Suitable outdoor space is provided for physical education including a number of

netball and tennis courts and football, rugby, cricket and hockey pitches. Boarding houses have large outdoor garden areas in addition to the school's extensive grounds and outdoor facilities.

### **Provision of information [ISSR Part 6, paragraph 32(1)(c)]**

- 2.37 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.

### **Manner in which complaints are handled [ISSR Part 7, paragraph 33; NMS 14]**

- 2.38 The school meets the standards.
- 2.39 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. Scrutiny of records shows that complaints since the previous on-site inspection have followed the school's policies, including those referring to sexual violence or sexual harassment.

### **Quality of leadership and management [ISSR Part 8, paragraph 34; NMS 2]**

- 2.40 The school meets the standards.
- 2.41 Senior leaders and governors demonstrate good skills and knowledge and fulfil their responsibilities effectively, so that all the other standards are consistently met, and they actively promote the wellbeing of the pupils. Measures planned or implemented for the proposed increase in pupil numbers are likely to ensure that the standards continue to be met with regard to pupils' wellbeing.

### **3. Recommendation with regard to material change inspection**

- 3.1 It is recommended that the request to increase pupil capacity from 360 to 380 is granted.
- 3.2 Welfare health and safety practices meet the standards. Recently constructed buildings and refurbishments to accommodate additional classrooms and facilities, including those for modern foreign languages, indicate that the standards are likely to continue to be met with the increase in numbers. The school meets the standards for recruitment of staff.

## 4. Summary of evidence

- 4.1 The inspector held discussions with the principal, senior leaders and other members of staff and met with the chair of governors and the safeguarding governor. He visited different areas of the school, observed lessons and talked with groups of pupils. He scrutinised a range of documentation, records and policies.

### Inspectors

Mr Desmond Dunne

Reporting inspector