



INDEPENDENT SCHOOLS INSPECTORATE

Advice Note for a Material Change visit

School name	CATS College London
DfE Number	202/6000
Address	43 – 45 Bloomsbury Square London WC1A 2RA
Proprietor	Cambridge Education Group Ltd
Date of visit	26th June 2015

CHARACTERISTICS OF THE SCHOOL

CATS College London is an independent sixth form college in central London that specialises in providing education for international and UK students aged between 15 and 24 years. Currently, students from 52 different nationalities attend the College. CATS College London is a limited company owned by a series of holding companies.

There are currently 241 students on roll, almost exactly fifty per cent male and female, of whom 238 students have English as an additional language (EAL). Five students have been identified as having special educational needs and/or disabilities (SEND); none has a statement of special educational needs or an education, health and care (EHC) plan. One hundred and forty-three students are boarders within one of the two boarding facilities, Premier House and Piccadilly Court. The remaining 98, effectively 'day students', either live independently or with guardians; none of these arrangements are made by the college. The college's policy is that students who wish to live outside the college must have the approval of the Principal. In the case of students under 18, permission will usually be granted if the student will be living with their parents or with a close relative or other appointed guardian with full written permission from the student's parents. Permission may also be granted for students to live independently if the student is aged over 18 on 1 September. At the time of the inspection visit, three students aged 15 or 16 were living with guardians. There were no students living with host families.

New boarding accommodation at Premier House opened in January 2015, a short walk from the main teaching and administrative buildings, in Southampton Row. The other residential accommodation at Piccadilly Court, near King's Cross, has operated since the college opened. Since January 2015, Piccadilly Court has housed only students aged 18 or over; until then, younger boarders also lived there, but they are now accommodated in Premier House. Much of the spare capacity in Piccadilly Court is taken up by students from another educational institution that forms part of the CEG Group, although the intention is that, as a result of the proposed material change, those students will in time move out and be replaced by greater numbers of CATS College students.

PURPOSE OF THE VISIT

This was an announced material change visit at the request of the Department for Education to assess the school's proposal to expand the school's boarding capacity to 346 through the addition of the new premises at Premier House, and to increase overall capacity to 450.

INSPECTION FINDINGS

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

The regulations and standard are not met.

The safeguarding policy posted on the school's website, dated 4 June 2015, identifies the need to safeguard children, both those in need and those at risk of harm. It shows concern for pupils and has been recently reviewed by external consultants. The school follows the procedures of the LSCB and models its policies on those of the local authority. School documentation provides full definitions of the different kinds of abuse and indicators of harm, in line with KCSIE. The college has confirmed and recorded that all staff have received and read Part 1 of KCSIE 2015, but the expectation that staff should do this is not specified in the policy.

The safeguarding policy contains references to guidance that is no longer up to date and does not stress that anyone can make a referral to children's social care. It does not make clear the threshold for consideration for referral to an external safeguarding agency under child protection procedures any bullying, where a child is at risk of significant harm. In the case of allegations or suspicions of abuse, the policy does not indicate that if a member of staff is reported to the DSL, the principal must be informed. It does not deal with possible abuse by one or more pupils against another pupil or stress the need to refer such abuse to an external safeguarding agency.

The school has regular contact with local children's services and the LADO, and also with DSLs at other local schools and colleges. Records show that the college promptly contacts children's social care or the LADO as appropriate if there are relevant concerns. The college consults with children's services on safeguarding matters, including in relation to overseas students in the holidays. Three cases were referred to the LADO during the past year, all of which have been resolved by the college following the LADO's advice. Detailed records are kept, including of any incidents of misbehaviour and sanctions imposed. Parents are informed appropriately where students are under 18. The policy states that allegations are reported within 24 hours, and that referrals to the DBS take place promptly (there have been none).

Training of all staff, including the DSLs, is at the required levels although the policy does not state that the training of the DSL is in accordance with locally agreed procedures and includes inter-agency working. Staff training in safeguarding takes place annually, delivered by the DSL. Every two years, additional training is provided by an external trainer. Appropriate records of attendance are kept, including of the training provided to all staff who are either absent on the day of the training or join the college at a later date during the year. Staff receive induction in safeguarding. Staff are aware of the whistle-blowing policy.

In the case of a disclosure or an allegation against a member of staff, staff know what procedure to follow. In the case of an allegation against the principal, staff stated in interview that they would report it to the safeguarding governor, but although the policy states clearly that the principal must not be informed, this is not clearly understood by all staff.

Governors carry out an annual review of safeguarding with comprehensive records kept, although the review does not identify all omissions in implementation of policies.

The college employs a counsellor who is available to students. There have been no recent cases of students self-harming, though in the past when a case has arisen, it has been handled appropriately by the welfare team and the college counsellor. The college also has an independent listener available throughout each weekday. Posters around the college alert students frequently to safeguarding matters. Boarding accommodation contains high profile signs and notices regarding bullying, how to make a complaint, whom to contact even about an allegation against staff.

Risk assessments are mostly but not always carried out when the DBS check has not been received, and are not always signed by senior staff. A selection of staff files was seen which reflected the record kept in the SCR. Some references are missing.

Suitability of staff, supply staff and proprietor [ISSR Part 4, paragraphs 18-21]

The regulation and standard are not met.

The single central register is meticulously completed. Not all DBS checks are completed before the appointment is taken up. Barred list checks were found to be in place before

appointment except in two cases where they were made one day after employment began. The college does not appoint guardians, but families who are interested in having a lodger aged over 18 are visited and interviewed by the college and DBS checks are carried out by an umbrella body in preparation for occasions when students of that age request independent accommodation.

Premises of and accommodation at schools [ISSR Part 5 and NMS 5]

The regulation and standard are met.

Sleeping accommodation for boarders is suitable, within a pleasant residential environment. Rooms in Piccadilly Court are bright and well decorated. Students have lockable areas, large beds and good facilities including an outdoor gym. The college places a high priority on security and measures in place are not intrusive. Kitchenettes are provided. Premier House contains well-designed flats with kitchen and communal areas. Each room has en-suite facilities. The house is bright and airy, with good facilities for relaxation.

Boarding accommodation is well organised. Risk assessments are carried out to ensure the safety of boarders. Appropriate separation is in place for residential accommodation for different genders and ages. Boarders have adequate facilities for study outside school hours and for social purposes. Toilet and washing facilities are appropriate and offer suitable levels of privacy. Individual rooms can be personalised by boarders. Access to boarding accommodation is restricted to boarders, though appropriate procedures are in place for them to invite guests. Boarders with restricted mobility can be accommodated on the ground floor. Outside groups do not use boarding accommodation when students are in residence.

Currently, one unit is occupied by language students from another arm of the CEG organisation who will move to another building owned by the group in order that additional CATS students can occupy that accommodation in the future.

Quality of leadership in and management of schools [ISSR Part 8 and NMS 13]

The regulation and standard are not met.

The systems in place for carrying out recruitment checks on staff are not rigorously implemented or monitored by those with leadership and management responsibilities.

The responsible body within the proprietorial structure, known as the executive committee, is aware of its responsibilities and of the ISSRs, and of the importance of safeguarding. However, governors do not rigorously monitor safeguarding measures in place in the college, including the carrying out of checks on new staff, and any monitoring that does take place is not recorded.

Those with leadership and management responsibilities have not ensured that all safeguarding measures in respect of the suitability of staff are implemented effectively and, in this aspect of their work, have not demonstrated the good skills and knowledge necessary in order to fulfil the role.

CONCLUSION

Based on the projected growth in student numbers and the boarding capacity within the existing facilities, once the current language students no longer occupy one of the units, the material change proposed by the college can be implemented without detriment to the

quality of boarding for the students or to their safeguarding, welfare, health and safety. Approval is recommended subject to timely completion of the actions set out below.

REGULATORY ACTION POINTS

The school does not meet all the requirements of the Education (Independent School Standards) Regulations 2014 (ISSR) and the National Minimum Standards for Boarding Schools 2015 (NMS).

Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraph 7(a) and (b), 8(a)&(b) and NMS 11]

- Improve the wording of the safeguarding policy as follows:
 - State that the training of the DSL is in accordance with locally agreed procedures and includes inter-agency working.
 - Ensure that all references to statutory guidance relate to current documentation, particularly *Keeping Children Safe in Education 2015* and *Working Together to Safeguard Children 2015*.
 - Ensure that the threshold is made clear for consideration for referral to an external safeguarding agency under child protection procedures, any bullying where a child is at risk of significant harm.
 - Include the requirement that if any allegation about a member of staff is reported to the DSL, the principal must be informed.
 - Specify that all staff must read at least part one of KCSIE 2015.
 - Include reference to possible abuse by one or more pupils against another pupil and stress the need to refer such abuse to an external safeguarding agency.
- Ensure that all staff are aware of the procedure to follow in the case of an allegation against the principal.
- If a DBS check has not been received before an appointment is taken up, ensure that a risk assessment has been carried out and appropriate measures including supervision implemented and that these are approved and signed off by a senior member of staff.
- Ensure that all references are received before appointments are taken up.
- Ensure that the proprietors fulfil their responsibilities effectively by conducting an appropriate annual review of the safeguarding policy and the efficiency of its implementation.

Suitability of staff, supply staff and proprietor [ISSR Part 4 paragraph 18]

- Ensure that all DBS checks are completed before appointments are taken up, and that, when a DBS certificate has not been received or seen before the date of appointment, barred list checks are obtained [paragraph 18(2)(a)].

Quality of leadership in and management of schools [ISSR Part 8 paragraph 34(1)(a) and (b) and NMS 13]

- Ensure that persons with leadership and management responsibilities at the college demonstrate good skills and knowledge appropriate to their role and fulfil their responsibilities effectively so that the independent school standards are met consistently.

SUMMARY OF EVIDENCE

Evidence gathered and activities undertaken

Documents scrutinised in advance or during the visit:

Safeguarding/child protection policy
Complaints policy
Staff code of conduct
Risk assessments
School development plan
Child protection training log and certificates
Staff and pupil handbooks; house handbooks
Staff duty rotas including boarding
List of staff employed by the school
List of visiting teachers working in the school
List of students by year group and by house
Recruitment procedure and records, including single central register of appointments
Sample of staff files
Complaints log, stage of resolution, parental communications and school replies
Whistle-blowing policy
Governors' annual review of safeguarding
Sanctions log
Records of behaviour incidents and bullying

Interviews conducted:

Initial meeting with the principal, and further meetings as required
Chairman of governors and safeguarding governor
Designated lead with responsibility for child protection
Assistant head of welfare, deputy DSL and college counsellor
Groups of teaching and non-teaching staff (selected by the RI on the day)
Groups of pupils (selected by the RI on the day)
Person responsible for keeping the single central register (HR officer)
Operations manager (premises)
Brief final feedback to principal and chairman

Other evidence collected:

Tour of relevant parts of the college, in particular boarding accommodation on both sites