

## St John's College School

73 Grange Road, Cambridge, Cambridgeshire, CB3 9AB

**Date of visit** 1 June 2015

### Purpose of visit

This was an unannounced emergency visit at the request of the Department for Education which focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs), particularly those concerned with safeguarding, behaviour and anti-bullying, first aid and medical procedures, the suitability of staff and recruitment procedures, the way in which complaints are handled, and leadership and management, including boarding.

### Characteristics of the School

St John's College School is a co-educational preparatory day and boarding school for pupils from the ages of 4 to 13. The school was founded in the 17<sup>th</sup> century by St John's College, Cambridge, for the education of the choristers of the college choir. The choristers and probationers continue to be educated at the school, which moved to its present location in Cambridge in 1955. The school is still owned by St John's College and is run as a charity, administered by a board of governors of whom one-half are fellows of the college.

At the time of the inspection visit, there were 457 pupils on the roll, 269 boys and 188 girls, of whom 33 were in the Early Years Foundation Stage (EYFS). Thirty-three pupils including the nineteen choristers and probationers board, which they may do from the age of eight. The school has identified 80 pupils who have special educational needs and/or disabilities (SEND), and one pupil has a statement of special educational needs. One pupil uses English as an additional language (EAL), and 51 pupils come from a minority ethnic background. The previous ISI inspection was carried out in May 2013.

### Inspection findings

#### **Welfare, health and safety of pupils - safeguarding [ISSR Part 3, paragraphs 7 and 8; NMS 11; EYFS requirements paragraphs 3.4 – 3.8]**

These regulations are not met because the policy is not compliant in content as specified below.

The staff Code of Conduct gives good guidance to staff in many areas concerning their behaviour and actions, so that they do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. It is recommended that guidance is also given on dealing with the intimate care of children in the EYFS.

In practice, safeguarding is given a high priority in the school and the local guidance is followed carefully. The designated senior person (DSP) and her deputy are trained by the local safeguarding children board (LSCB) personnel at the correct intervals and their training is up-to-date. The list of staff training demonstrates that all staff are trained in child protection every two years (exceeding the guidelines of the LSCB which specifies training at least every three years) by the DSP and deputy DSP, and the LSCB asks for annual confirmation of this. The training includes whistle-blowing, the broad range of needs of children including body image, eating disorders and mental health issues, the code of conduct, and how to recognise signs of abuse and listen to children in the event that they make a disclosure or allegation. The whistle-blowing policy for voicing any concerns about colleagues is well-known by staff. They know what to do should there be an allegation against a member of staff or a volunteer, or against the headmaster. New staff and volunteers receive the correct induction in child protection which begins before they start work at the school, and they have to sign that they have read the required documents, meet with the DSP for discussion about their understanding and finally fill in a questionnaire to confirm this. All staff have been given a copy of the latest version of *Keeping Children Safe in Education*.

From discussion with the DSP and the headmaster, and from minutes seen dated November 2014, it is clear that the governors carry out their duty to annually review the safeguarding policy and the school's procedures and practice. The DSP presents a report on any changes to the policy, and her annual audit of safeguarding practice. She also confirms that the required staff training has been undertaken. It is recommended that the governors' minutes are strengthened so that it is clear how much discussion has taken place, and that the governors are satisfied with the policy and the efficiency with which the related duties have been carried out. The DSP has regular contact with the local children's social care services and reports to them expeditiously. Any safeguarding concerns or disclosures, including children in need as well as those at risk of harm, are referred on to children's social care services immediately and advice taken. Records are detailed, clear and thorough. The school understands its responsibility to report to the Disclosure and Barring Service and to the National College for Teaching and Leadership if appropriate any staff or volunteers whose service are no longer used because they are considered unsuitable to work with children.

In discussion with pupils, they have a good understanding of how to keep safe and develop an awareness of the risk from others. The school uses the Cambridgeshire Personal Safety Programme for Schools called *Staying Safe* which covers issues at an age-appropriate level for all year groups. Pupils learn strategies they can use to keep themselves safe, both from adults around them and in their use of technology. The personal, social, health and economic education (PSHEE) programme is comprehensive in its coverage of a wide range of topics. Pupils know that they can choose who to talk to if they have a concern. They work closely with their form tutors who encourage them to choose in confidence a 'safety network' of staff who they would feel happy to approach should they have a problem. The boarders are aware of the independent listener, to whom they can turn, because her name and contact details are advertised on noticeboards in dormitories and in communal areas. She also visits the house regularly to meet with boarders. The welfare of those boarders who are choristers and probationers is carefully considered and supported. These pupils feel that they are well looked after and they enjoy their life in school. They say that staff understand their needs and make allowances when their timetables become a little demanding. For example, if they feel tired, they can have extra rest or relaxation. Risk assessments are carried out at every level of the choristers' commitments, and, through regular meetings of those who take responsibility for them, their welfare is assured. Weekly planning by the housemaster and headmaster means that they can pre-empt the issues which may arise and respond quickly to any foreseen difficulties.

The recruitment policy is generally comprehensive although it does not contain the requirement for the appropriate staff to declare any disqualification by association; in practice this has been completed as required.

**Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 12; EYFS requirements paragraphs 3.52 – 3.53]**

These regulations are not met.

The policy is not compliant with NMS or the EYFS requirements as specified below. The DfE non-statutory guidance for the behaviour policy is not followed sufficiently closely. Several policies providing guidance for staff and parents are dispersed in other documentation. There was no evidence of practical guidance to staff about physical restraint or the use of reasonable force, nor were clear arrangements written down for the searching of pupils and their possessions. The pupils recognise that there are school rules, but were not able to indicate where these are written down clearly.

The practice for ensuring the welfare of pupils through monitoring any incidents of misbehaviour is of high quality. The behaviour logs are comprehensive and thorough in detail, and link both boarding and day-school issues, which result in detailed action plans for each pupil. The sanctions are designed to fit the child's needs, and are immediately recorded and monitored to ensure as consistent an approach as possible. Where there have been difficulties of a behavioural nature, a support mechanism has been designed to help pupils settle into lessons, called a 'satis' record card; the teacher signs to say how well the aims set for that pupil have been achieved, and these aims are reviewed weekly in tutor meetings. Regular pastoral meetings are held between tutors and the deputy head to discuss each child who is a cause of concern. The pupils appreciate the fact that the deputy head has an 'open door' for them. The school believes in having open communication with parents about their children's behaviour and parents are informed as appropriate about any issues. Staff receive training in the school's procedures for giving and recording rewards and sanctions in staff meetings, and guidance is given in the staff handbook.

The needs of boarders are discussed at the beginning of each term so staff are fully aware of their pastoral and academic needs, particularly those of new boarders. The boarders said that staff are fair, and that any disagreements are quickly sorted out; they say it is just like a big family. The welfare provision for choristers is discussed weekly. An example of an individual boarder's records of welfare demonstrate excellent levels of care between boarding and day-school life, and strong links with parents. The day book in the boarding house links boarding and day care. Almost all pupils involved in discussion indicated that they believe that the distribution by staff of rewards and sanctions is fair.

**Welfare, health and safety of pupils – anti-bullying [ISSR Part 3, paragraph 10; NMS 12]**

These regulations are not met.

The anti-bullying policy on its own is not compliant with NMS as specified below and does not follow DfE guidance in content; some of this content is also contained in *Major pastoral concerns*. The document produced as the e-safety policy consisted of parts of the scheme of work for PSHEE on e-safety, and the *Computer Use Guidelines for Senior House Children* which pupils sign to indicate they understand the rules for using the internet. Anti-bullying leaflets provided for boarders and other pupils are helpful in explaining in child-friendly language what bullying is, why it is not acceptable and to whom and how pupils must report any incidents.

The practice for ensuring the welfare of pupils through the monitoring of the few incidents of bullying is strong. Parents are involved quickly and the records kept are thorough and detailed, enabling the provision to be evaluated and patterns identified. Sanctions are appropriate for the misdemeanour and consistently applied. Staff are given regular training in dealing with bullying and supporting both the victim and the bully, and any information about bullying issues is shared in regular pastoral meetings. Pupils indicated that they are taught about cyber-bullying and how to use the internet as safely as possible. In discussion, the deputy head stated that recently the school has worked hard and continues to do so to ensure that pupils, parents and staff understand the dangers of the virtual world. There has been a significant focus on these issues in tutor meetings, and stringent filter systems are being used, with in-school accounts being monitored carefully. The pupils were clear that bullying is rare, but they are confident that staff deal with it quickly and constructively when it does occur.

**Welfare, health and safety of pupils – first aid [ISSR Part 3, paragraph 13; NMS 3; EYFS requirements paragraphs 3.25, 3.44-3.46, 3.50-3.51]**

These regulations are not met.

The first aid policy does not sufficiently follow the DfE guidance in content, with several different policies and procedures covering parts of the guidance and some important topics being omitted altogether. Some of the NMS and EYFS requirements are missing from the administration of medicines policy.

In practice, excellent records are kept of the administration of medicines and the first aid given in the event of accidents and injury, and these records are accurately maintained. Parents of children in the EYFS are informed of either of these on the same day or as soon as reasonably practicable. Designated staff have been trained in the administration of medication. Medicines are correctly stored and only administered to the boarder for whom they have been prescribed. The school nurse visits the boarding house first thing every morning and gives out prescribed medication; this is recorded, and she meets with the boarding staff to discuss any medical concerns of boarders during the night. Thus the needs of boarders are monitored on a daily basis. If an accident occurs which requires calling an ambulance, this is done expeditiously, and the nurse will accompany pupils until the parents can arrive at the hospital. The pupils say that they are very well looked after when they become ill while at school and their parents are informed as soon as possible, particularly if they have an accident; they gave two examples of when accidents had occurred and how well pupils had been looked after by the staff. Pupils who have particular needs such as asthma have easy access to their inhalers when they need them. Care plans are drawn up for these pupils so that they are given the support they need. A few boarding pupils are risk assessed as competent to self-administer some forms of medication. The nurse and senior staff are always available on call.

**Suitability of staff and supply staff [ISSRs Part 4, paragraphs 18-21; NMS 14; EYFS requirements paragraphs 3.9 – 3.17]**

The Single Central Register of Appointments has been filled in accurately as required and almost all of the required checks have been carried out. A number of staff who do not carry out class-teaching roles, such as visiting music teachers and swimming instructors, had not been checked against the list of teachers who have been given a prohibition order. After this was brought to the school's attention, the school carried out these checks while the inspection visit was taking place, so that, by the time the inspectors left, all was completed correctly. All staff have received an enhanced disclosure and a barred list check. Apart from the afore-mentioned prohibition order checks, all recruitment procedures have been carried out on all staff appointed since the previous inspection before they began work at the

school. Enhanced disclosures and barred list checks have also been carried out on other adults who live on site but are not employed by the school.

**The manner in which complaints are handled [ISSR part 7, paragraph 33; NMS 18; EYFS requirements paragraphs 3.74 – 3.75]**

These regulations are not met.

The complaints policy does not have a clear three-stage process as required. Records of all informal concerns and complaints are kept within the pupil's profile, in case they escalate in importance over time. Staff are aware of this process, although no guidance is specifically given in writing. Those complaints which have become formal in writing to the headmaster are detailed and handled with care, although there has only been one since the previous inspection. A written record is kept of the action taken as a result of the complaint. There has been no complaint which has gone to a panel hearing since the previous inspection, although the chair of governors is made aware in regular discussions with the headmaster of any significant issues as they arise.

**The quality of leadership in, and management of, schools [ISSRs Part 8 paragraph 34(1); NMS 13]**

These regulations are not met.

The school actively promotes the well-being of the pupils in its care through its strong practice, but the independent school standards regulations are not met consistently in the quality of, and the content within, its policies. In some areas of regulation such as behaviour, anti-bullying, first aid and the administration of medicines, there are several policies which refer to various aspects of the regulations, and some requirements are omitted. Scrutiny of the documentation showed that the school has not been rigorous in ensuring that it keeps up-to-date with the most recent regulatory changes.

Pupils indicated that the routines within the boarding house are clear, and are followed by staff and boarders alike. The headmaster, together with the housemaster, had introduced the 'get ready, get clean, get reading and go to sleep' regime to improve bedtime routines. Communications between the school and parents are strong, including the boarding house. The school undertakes regular surveys with parents about its provision, most recently a survey with parents of boarders about the boarding house. Almost all parents gave positive responses to the questions asked. The headmaster and housemaster have meetings with parents of choristers and boarders at the beginning of every term. Each pupil has a regular action plan which focuses on the needs and progress of the pupils, and these plans also record any communication between home and school. Records of action plans are effectively detailed about any issue which has, or could have, an impact on the pupil and the care given to boarders by the boarding staff, school and home; these exemplify the continual and positive involvement of the parents.

In discussion, the headmaster raised specific examples of how he believes the school demonstrates effective delivery of the boarding and welfare provision, in particular that relating to the choristers and probationers, and the action that he takes when necessary. All management processes are carried out, including the monitoring of teaching and learning, a performance management procedure, and positive encouragement for staff to participate in continuing professional development. Effective oversight of the EYFS is carried out by the head of the prep school, and the oversight of boarding is undertaken by the deputy head, both of whom then report to the headmaster.

## Regulatory action points

The school does not meet all 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.

### ISSR Part 3 - Welfare, Health and Safety - Safeguarding [paragraph 7(a) and (b), paragraph 8(a) and (b), NMS 11 and EYFS requirements paragraph 3.4-3.5]

Improve the wording of the safeguarding policy as follows:

- combine the *Safeguarding and Child Protection Policy* with the *Safeguarding and Child Protection Policy Guidance to Staff*, to ensure some of the points below are included in the combined document, then amend further as required;
- give contact details for children's social care (using the local name) for use in relation to children in need of help or who are the focus of concern;
- give contact details for the LADO and describe the function of the LADO in providing advice and presiding over the investigation of any allegation or suspicion of abuse directed against anyone working in the school;
- refer to and work from the most up-to-date statutory guidance, *Keeping Children Safe in Education 2015* and *Working Together to Safeguard Children 2015*;
- state that, if at any time there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately;
- state that if a crime may have been committed, the matter should be reported to the police;
- provide definitions of the different kinds of child abuse in line with KCSIE and a list of possible signs;
- state clearly that safeguarding is everyone's responsibility and that anyone can make a referral to children's social care services;
- emphasise the sensitivity needed in receiving a disclosure, including that leading questions are not to be asked;
- deal with possible abuse by one or more pupils against another pupil including the legal threshold, and stress the need to refer such abuse to an external safeguarding agency;
- give a clear account of the way allegations or suspicions of abuse are reported in the school: staff **and volunteers** to the head; and the head to the chair of governors **without informing the head**;
- provide for a report to be sent promptly to the Disclosure and Barring Service, if the school dispenses with a person's services because of unsuitability to work with children, or would have done so had the person not resigned;
- state that consideration is also given to making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence';
- cross-refer to the school's safer recruitment policy;
- ensure that assurance is gained that the staff of another organisation have been checked for suitability if they supervise the school's pupils on a site other than the school;

- give the status and authority of the deputy DSPs, amending one so it accurately reflects the current situation, and state the name of the person who is responsible for safeguarding in the EYFS;
- outline the main responsibilities of the DSP as described in KCSIE Annex B;
- ensure that **the head and volunteers in regulated activity** have regular child protection training alongside the staff, mentioned as every two years; and that temporary and voluntary staff are also given induction training in safeguarding when they begin work at the school;
- give the date of the annual review of the policy by governors and indicate that it is signed-off by the chair of governors;
- ensure sufficient account has been taken of the nature, age range and other significant features of the school in the provisions made for safeguarding;
- include that **all** staff read at least part one of KCSIE April 2015;
- outline the restrictions placed on the use of mobile 'phones and cameras in the EYFS setting;
- make reference to the need to provide alternative accommodation if a member of the boarding staff is suspended in circumstances of a child protection nature;
- stress the school's response to relationships in boarding and the potential for abuse by peers.

Improve the wording of the safer recruitment policy as follows:

- include the requirement that the school must check whether all staff who work with children in the EYFS or who manage this provision, as well as those who care for children up to the age of eight either in before- or after-school provision, are disqualified from childcare, including by association;
- include that a check against the barred list will be undertaken on all staff, either within the enhanced DBS disclosure or separately.

It is recommended that the school also includes the following point in the Staff Code of Conduct:

- guidance on dealing with the intimate care of children in the EYFS.

**ISSR Part 3 - Welfare, health and safety of pupils – behaviour [paragraph 9; NMS 12; EYFS requirements paragraphs 3.52 – 3.53]**

Improve the wording of the behaviour policy as follows:

- include information about the rewards that are given to pupils to promote their good behaviour;
- [for EYFS] state that corporal punishment is not used **or threatened**;
- [for EYFS and boarding] give information about when and how physical restraint or reasonable force may be used, and, in the event of its use, how it is recorded and managed, and that parents will be informed the same day or as soon as reasonably practicable;
- [for boarding] include the school rules;
- [for boarding] include the arrangements for searching pupils and their possessions.

It is recommended that the school also includes the following points:

- make reference to the non-statutory advice upon which this policy could be developed – *Behaviour and Discipline in Schools* (2014);
- state clearly the school’s duties under the Equality Act 2010, including issues related to pupils with SEND and how reasonable adjustments are made for these pupils;
- the way in which the school manages pupils’ transition;
- state the disciplinary action taken against pupils who are found to have made malicious accusations against staff;
- ensure after amendment that parents are informed how this policy is made available to them.

**ISSR Part 3 - Welfare, health and safety of pupils – anti-bullying [paragraph 10; NMS 12]**

Improve the wording of the anti-bullying policy as follows:

- [for boarding] include the specific measures below to combat cyber-bullying.

It is recommended that the school also includes the following points:

- update the reference to the non-statutory advice upon which this policy could be developed – *Preventing and Tackling Bullying* (Oct 2014);
- state that records of bullying are kept to evaluate the effectiveness of the approach adopted or to enable patterns to be identified;
- raising the awareness of staff through training, so that principles of the school policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems, and sources of support are available;
- state what the sanctions are which will reflect the seriousness of an incident and convey a deterrent effect;
- state that helpful examples of good behaviour and respect will be set by staff and older pupils.

Concerning cyber-bullying, it is recommended to include the following:

- clearly define the roles and responsibilities for online safety as part of the school’s wider safeguarding strategy;
- give clear guidance on the use of technology in the classroom and beyond for all users, including staff, pupils and visitors that references permissions/restrictions and agreed sanctions;
- outline the school’s technical provision/infrastructure and the safeguards in place to filter and monitor inappropriate content and alert the school to safeguarding issues;
- give detail on how the school builds resilience in its pupils to protect themselves and their peers through education and information;
- give detail about staff training that includes online safety;
- describe the reporting mechanisms available for all users to report issues and concerns to the school and how they are managed and/or escalated;
- how the school informs, communicates with and educates parents/carers in online safety;
- how personal data is managed in line with statutory requirements.

**ISSR Part 3 - Welfare, health and safety of pupils – first aid and administration of medicines [paragraph 13; NMS 3; EYFS requirements paragraphs 3.25, 3.44-3.46, 3.50]**



Improve the wording of the first aid policy as follows:

- [For EYFS] include that at least one person who has a current paediatric first aid certificate must accompany children on outings;
- [for EYFS] specify that a written record will be kept of accidents or injuries and the first aid treatment given and parents will be informed of this information **the same day or as soon as reasonably practicable**;
- [for boarding] include guidance for staff on what to do to support those boarders and other pupils with chronic conditions and disabilities, e.g. asthma, etc.

Improve the wording of the administration of medicine policy as follows:

- [For EYFS] include a procedure for responding to children who are ill or infectious which is discussed with parents and/or carers;
- [for EYFS] state that this policy also covers the EYFS for administering medicines, including systems for obtaining information about a child's needs for medicines and for keeping this information up-to-date;
- [for EYFS] state that medicine (both prescription and non-prescription) must only be administered to a child where written permission for that particular medicine has been obtained from the child's parent and/or carer;
- [for EYFS] state that a written record will be kept each time a medicine is administered to a child, and that the child's parents will be informed the same day or as soon as reasonably practicable;
- [for boarding] state that all medication is securely stored and proper records are kept of its administration, that boarders allowed to self-medicate are assessed as sufficiently responsible to do so, and that the confidentiality and rights of boarders as patients are appropriately respected.

It is recommended that the school also includes the following points in the first aid policy:

- name those who are qualified in first aid;
- describe the hygiene procedures for dealing with the spillage of body fluids;
- make reference to RIDDOR.

#### **ISSR Part 4 – Suitability of staff and supply staff [paragraphs 18(2)(a) and (b); NMS 14; EYFS requirements paragraphs 3.10 – 3.11]**

Improve the implementation of the safer recruitment policy as follows:

- ensure that, in future, prohibition order checks are carried out on all staff who carry out teaching work before they begin work at the school.

#### **ISSR Part 7 - The manner in which complaints are handled [paragraph 33(b) - (d), (f), (i) – (k); NMS 18; EYFS requirements paragraphs 3.74 – 3.75]**

Improve the wording of the complaints policy as follows:

- state how the policy is available to parents [33(b)];
- give a time limit for the school to respond to informal complaints [33(c)];
- state clearly the three stages of the complaints process, including the first stage of an informal process and the second stage of a formal process in writing [33(d) and (e)];
- clarify the wording concerning the three members of the complaints panel so that it effectively represents the regulation [33(f)];

- stipulate that the complainant will not only be given the judgement, but will receive the findings and recommendations of the panel, as will the person complained about [33(i)(i)];
- stipulate that the findings and recommendations will be available for inspection on the school premises by the chair of governors and the headteacher [33(i)(ii)];
- state that a written record will be kept of all complaints that are made in accordance with stage 2 (formal), and (i) whether they are resolved following a formal procedure, or proceed to a panel hearing; and (ii) the action taken by the school as a result of those complaints (regardless of whether they are upheld) [33(j)];
- amend the section of the Act to section 109 of the 2008 Act [33(k)];
- the details given for EYFS parents to contact Ofsted are incorrect and should now read: Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD. General helpline 0300 123 1231; textphone no. 0161 618 8524 [EYFS];
- state that written complaints relating to the fulfilment of the EYFS requirements will be investigated and complainants notified of the outcome of the investigation within 28 days of having received the complaint [EYFS];
- state that the record of complaints in the EYFS will be available to Ofsted and ISI on request [EYFS];

It is recommended that the school also makes the following amendments to the complaints policy:

- As ISI is the inspectorate for boarding, boarders and their parents may now contact ISI rather than Ofsted.

### **ISSR Part 6 - Provision of Information**

Ensure that the number of complaints registered under the formal procedure in the previous academic year is made available to parents. [32(3)(f)]

### **ISSR Part 8 – Quality of leadership in, and management of, schools [Paragraph 34(1)(a) and (b) and NMS 13.3 and 13.4]**

Improve the quality of leadership and management by:

- combining all the various policies together under each of the following topics: behaviour, anti-bullying, first aid and administration of medicines; and amend further as indicated above, thereby ensuring that the school's policies are in line with regulatory requirements;
- developing a system whereby senior managers are rigorous in ensuring that they keep up-to-date with the most recent regulatory changes.

### **Other Recommendations**

In addition to the above regulatory action points the school is advised to make the following improvement.

1. Ensure the governors strengthen their minutes to reflect their discussion concerning their annual review and the DSP's report of the safeguarding policy and procedures.