

Moorland School

Ribblesdale Avenue, Clitheroe, Lancashire, BB7 2JA

Date of visit 19 May 2015

Proprietor Mr Jonathan Harrison

Purpose of visit

This was an unannounced visit carried out at the request of the Department for Education (DfE), which focused on the compliance of the school with the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools 2015, and the Early Years Foundation Stage (EYFS) requirements, particularly, those concerned with safeguarding; pupils' welfare, health and safety, including measures to promote good behaviour, to guard against bullying, and to ensure suitable supervision of pupils, first aid and risk assessment; handling parents' complaints.

Characteristics of the School

Moorland School is a day and boarding school for boys and girls aged 3 months to 18 years, situated in the town of Clitheroe. The school currently educates 321 pupils, of whom 144 are in the senior school, the focus of the visit. Just under half of pupils are in the Early Years Foundation Stage (EYFS) and around a sixth are boarders. Most pupils are white British, with a number of different nationalities represented in boarding. The school is contained on a semi-rural site on the edge of the town. The school identifies 26 pupils as having special educational needs and/or disabilities (SEND); no pupils have a statement of special educational needs; 20 have English as an additional language (EAL). The school is a company limited by guarantee with one registered proprietor who is also the headteacher. The previous ISI boarding inspection was in May 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 does not provide appropriate support for pupils' needs. The safeguarding policy, dated May 2014, identifies the need to safeguard children at risk of harm and those in need but has not yet been updated to meet the requirements of the most recent statutory guidance, *Keeping Children Safe in Education (KCSIE) 2015* and *Working Together to Safeguard Children (WTTSC) 2015*. The policy shows concern for pupils. It acknowledges guidance from the Local Safeguarding Children Board (LSCB) and makes reference to

earlier statutory guidance, including KCSIE 2014 and WTTSC 2013. The policy is provided to parents online.

At the time of the visit, the DSL and his nominated deputy were both absent from the school. Two members of staff with appropriate training as designated leads were available to cover any emergency. They were unable to identify any arrangements made to ensure that all staff were made aware of KCSIE 2015, or for the implementation of changes to other statutory guidance made in 2015. One of the two staff is not named as a deputy DSL within the safeguarding policy.

The policy does not require that all staff read Part 1 of KCSIE. In interviews, staff were clear that Part 1 of KCSIE 2014 had been provided for them to be read; provision for staff in EYFS was less clear with some staff unable to recall being given the document. The staff code of conduct is inadequate regarding conduct in relation to pupils. It deals with general behaviour and professionalism in such areas as punctuality and use of appropriate language but makes no reference to communication with pupils via social media, acting in a position of trust or whistle-blowing procedures. Some appropriate guidance is given in the safeguarding policy relating to one-to-one meetings with pupils and appropriate behaviour in boarding areas. No guidance is included relating to the provision of alcohol to pupils, a concern which was raised relating to staff behaviour in a recent publicised incident. In interviews, staff were clear that providing alcohol to pupils is not permitted by the school. No evidence was provided of how the school intends to update the code to include the elements required by KCSIE 2015.

The safeguarding policy contains a commitment to safer recruitment and makes reference to a recruitment policy. This policy provides for most required checks but is insufficient because it does not stipulate that DBS checks are required to be at enhanced level, and omits checks against the prohibited list for those involved in teaching; nor does it stipulate that checks against the barred list must be obtained for all staff. Time did not permit detailed scrutiny of the school's single central register (SCR) of appointments during the visit. The school has recently appointed new staff to oversee recruitment checks and to keep the register. In interviews, these staff showed effective understanding of amendments needed to ensure that the school's recruitment procedures are comprehensive in meeting requirements.

The policy includes definitions of abuse but these do not fully match the scope of those in KCSIE. It provides for possible abuse by one or more pupils against another pupil. Discussion with the deputy designated safeguarding leads (DSL) showed awareness of the roles of children's services and the LADO. They confirmed that causes for concern regarding both children in need and children at risk have been referred to children's services and some evidence was found in records of child protection. However, recording overall is insufficiently methodical to demonstrate that pupils always receive the right help at the right time to address risks and prevent issues escalating, that the DSL acts on and refers the early signs of abuse and neglect, keeps clear records, listens to the views of the pupil, reassesses concerns when situations do not improve, shares information quickly and challenges inaction. During interviews, pupils showed clear understanding of what 'staying safe' means; they are confident that their concerns are listened to; they recall guidance given about e-safety and know who to turn to if they have a concern.

The school's safeguarding policy shows awareness of the procedures of the local children's services, Lancashire. It gives contact details for local agencies. Suitable definitions of safeguarding are given and the school's boarding context is reflected in guidance within the policy. Responses in interviews show that staff are aware of their responsibilities in a residential setting. The policy recognises that bullying is a safeguarding matter and in interviews, staff showed awareness of the seriousness of bullying. The policy guides staff as

to what to do if they have concerns and requires immediate reporting to the DSL. It is stated that staff must not promise confidentiality to pupils or ask leading questions and reference is made to LSCB procedures. In interviews, staff showed appropriate understanding of what actions to take if they have a concern, and readiness to take them. However, the policy does not state clearly that safeguarding is everybody's responsibility and that anyone can make a referral.

The policy makes appropriate provision for handling allegations against staff or other adults working in the school. The policy states that the head must contact the LADO immediately following receipt of any allegations and contact details are given. It makes appropriate provision for reporting allegations about the head, as a proprietor, directly to the LADO. The policy makes provision for reporting to the police. It provides for reporting any person whose services are no longer used where referral criteria are met to DBS and/or NCTL. The senior proprietor confirmed that there had been no occasion recently to implement these procedures and that no member of staff is currently the subject of an investigation.

Safeguarding is not securely managed. The policy names the head, who is also the DSL, to take responsibility for child protection matters, together with alternative persons in the absence of the DSL, but none of these has status or authority in the senior section of the school, or has experience of boarding. In interviews, including during the telephone conversation with the head, staff referred to the EYFS area manager, who has appropriate status within the school, as the usual deputy for the head in handling safeguarding, but this figure is not named in the policy along with the head and was absent during the visit. The status of the named deputies to lead safeguarding within the EYFS is appropriate. The role of the DSL is outlined appropriately at different points in the policy although not in one coherent section. The policy requires that any deficiencies or weaknesses in child protection arrangements are remedied without delay, and provides for annual review by the proprietors. This takes place, led by the head rather than either of the other proprietors, but the deficiencies in the school's provision of safeguarding show that review is not effective.

Staff receive regular update training in child protection and were able to confirm this during interviews, and recall aspects of training. There is no systematic, centralised method of recording training to identify that all staff have been trained, when and by whom. The need for such a centralised record has been identified by new administrative staff who also have responsibility for keeping the SCR. The safeguarding policy does not provide comprehensively for training in child protection as part of induction; several required elements are missing from the arrangements listed within the safeguarding and recruitment policies. In interview, staff recently appointed confirmed that, although they had received child protection training at previous schools and therefore had understanding of their responsibilities, no specific induction in child protection had been received on arrival at the school, including the requirement to read Part 1 of KCSIE. The training for the DSL has not been maintained at two-yearly intervals; that for the deputy DSLs is appropriate and up to date.

The policy appropriately identifies that it applies to the EYFS; it names an individual to take responsibility for safeguarding in the EYFS. It makes provision for the use of mobile phones and/or cameras in the setting and states clearly that private equipment cannot be used to record images of children.

Welfare, health and safety of pupils – the promotion of good behaviour, including promoting positive relationships in boarding [ISSR Part 3, paragraph 9; NMS 12; EYFS 3.52 to 3.53]

The school meets the requirements.

The school's policy to promote good behaviour is published on the school website, and the most recent review is dated April 2014. A separate section contains the required elements of behaviour policy for the EYFS. The policy makes no reference to available guidance on promoting good behaviour but contains most of the elements recommended in *Behaviour and Discipline in Schools* 2014. It aims to promote good behaviour through celebrating achievement with a varied range of rewards recorded by a 'traffic light' system, eg green rewards for positive behaviour, amber for warnings and red for sanctions. It recognises the particular circumstances and needs of individual pupils in imposing sanctions or giving rewards. The types of sanctions used in the school are described and are linked to specific misdemeanours; the use of serious sanctions is appropriately referenced. The policy requires staff to record poor behaviour in notes, in their planners and pupils' planners and to keep senior staff informed of serious misbehaviour. In interviews both staff and pupils showed understanding of these systems and confirmed their implementation. There is no reference in the policy to how records of sanctions will be kept centrally or monitored, or how regularly, to enable trends to be identified. In practice, the senior member of staff responsible for pastoral care keeps a suitable central log of sanctions although this is limited in its scope to provide information about trends in pupil behaviour and types of incidents that occur.

The behaviour policy states that corporal punishment is not to be used, and makes the provision that it must not be threatened in the EYFS. Suitable provision for physical restraint is included. Reference is made to the school's anti-bullying policy but sanctions related to bullying are not identified separately. The policy makes no reference to training for staff about promoting good behaviour and no training about behaviour is shown in the record of training provided to inspectors, although staff showed appropriate understanding of how to promote good behaviour and the school's provision. The policy makes suitable reference to keeping parents informed. The policy lists a number of ways in which the school educates pupils to behave well and promotes their understanding of the need for good behaviour; these include talks about the use of social media given by the police.

Welfare, health and safety of pupils – measures to guard against bullying [ISSR Part 3, paragraph 10; NMS 12]

The school meets the requirements.

The school's policy to guard against bullying is published on its website. The policy posted is dated 2013-14 in a footer, but the latest review date is May 2012 and the policy makes reference to outdated guidance; it does not refer to advice published since then, such as *Preventing and Tackling Bullying*, although some of the provisions of that guidance are reflected. The policy makes suitable reference to e-safety and cyber-bullying. It includes comprehensive definitions of bullying.

The policy provides for educating pupils about bullying through assemblies and personal, social and health education (PSHE). Pupils confirmed their experience of this in interviews; they stated that the school is rigorous in acting to deter bullying and any incidents are rare. The policy provides for training to be 'accessible' to staff but there is no further detail given of the type of training staff receive. In practice, staff receive training about bullying regularly and showed effective understanding about how to guard against bullying when interviewed. The policy requires pupils to act if they observe bullying and makes suitable provision for

supporting victims of bullying and the perpetrators. The policy refers to sanctions for bullying but does not define these. In practice, the school handles incidents of bullying appropriately, with due regard for both the bully and the victim; this was confirmed by records of incidents. In interviews, pupils stated that the school acts quickly when incidents occur. The policy requires staff to record incidents of bullying in the 'Incidents book' and to inform senior staff of serious or prolonged incidents. This was done effectively in recent incidents. There is no provision in the policy for centralised logging of bullying incidents or how this may be used for patterns or trends to be identified. No specific timescale is given for review. In practice, as with other incidents of poor behaviour, central recording is effective and shows suitable steps are taken to deal with any bullying that occurs, which is little, but recording is limited in its scope to provide overall information about trends in pupil behaviour and types of incidents that occur.

The policy makes no reference to involving parents although records show that when incidents occur, the school maintains regular communication with parents, although meetings are not always clearly documented.

Welfare, health and safety of pupils, including the safety of boarders [ISSR Part 3, paragraphs 11 & 16; NMS 6]

The school does not meet the requirements.

The school takes appropriate steps to ensure the health and safety of pupils on trips during school time, but arrangements for boarding trips are less systematic. In interviews, staff were clear that it is not permitted to allow pupils to consume alcohol and pupils confirm that this is implemented in practice.

The school takes appropriate steps to ensure the health and safety of pupils in class, particularly where there is risk of injury, such as in subjects such as science and art. Records show that pupils are given effective guidance on the use of particular resources which pose a threat of injury.

Measures to ensure that boarding areas are secure are effective. In interviews, boarders confirmed that the key card system used to operate the electronic system works effectively. They explained that they can always get out although regaining access is more problematic at night.

The school has recently appointed a new member of the administrative staff to oversee trips and other areas of risk associated with activities during the school day. This effectively provides oversight of risks associated with teaching but does not include any risks associated with boarding trips. The school has not yet drawn up and effectively implemented a comprehensive written risk assessment policy as required by the revised regulations of December 2014.

Welfare, health and safety of pupils – suitable provision of first aid [ISSR Part 3, paragraph 13; NMS 3.1]

The school does not meet the regulations.

The school has a satisfactory policy for first aid but has not ensured that first aid is always administered in a timely and competent manner. Day-to-day administration of first aid for minor incidents and illness by office staff is effective and fulfils the policy's stated intention that staff should give first aid to their best of their ability. Other staff, including those with responsibilities in boarding show suitable awareness of appropriate action to take for such incidents. The administration of medicines is appropriate and recorded. Parental consent

for treatment is secured appropriately. However, the identification of the seriousness of some injuries has not always been effective. This has meant that suitable external help has not been sought resulting in delays to the provision of treatment. The school has taken steps to increase expertise available to staff within the school, and enhance training, by appointing a suitably qualified member of staff. However, staff gave conflicting answers as to when this expertise would become available and staff with first-aid responsibilities could not confirm that they had yet received additional training in how to identify and treat burns injuries. The first-aid policy has not been reviewed since a recent injury sustained by a pupil to include additional guidance in the light of that incident.

Welfare, health and safety of pupils – ensuring proper supervision of pupils [ISSR Part 3, paragraph 14; NMS 15.3 and 15.5]

The school meets the requirements.

Suitable arrangements are made and implemented to supervise pupils in class, including in lessons where there are hazards such as dangerous equipment. In interviews, staff showed suitable awareness of their responsibilities.

Suitable arrangements are made and implemented to supervise pupils on trips. Where supervision has not been sufficient because of failures to comply with the school policy, such as a trip where pupils were allowed to consume alcohol by staff, the school has taken disciplinary action against staff. In interviews, staff were clear about their responsibility to ensure that pupils do not consume alcohol.

The manner in which complaints are handled [ISSR Part 7, paragraph 33; NMS 18; EYFS 3.74 & 3.75]

The school does not meet the regulations.

The school's complaints policy does not meet requirements because it does not include all the content required by the regulations. Timescales are provided for most stages, but not clearly for handling Stage 2 (formal) complaints other than as indicated for complaints relating to the EYFS. The policy has not been updated to meet the revised requirements of December 2014, therefore it lacks provision to keep a record of action taken by the school as a result of complaints which reach the formal procedure or the panel stage, regardless of whether they are upheld. The most recent review of the policy pre-dates the 2014 revisions.

The school does not implement its policy effectively and in accordance with its procedures and timescales. The log of complaints provided to inspectors demonstrated methodical recording which includes the date a complaint was received and the date of resolution. The details of complaints entered show prompt responses which involve the appropriate staff and indicate resolution of concerns. In interviews, staff were aware of expectations for them to respond promptly to informal concerns. However, the log of complaints does not include detail of the stage at which resolution is achieved and no complaints are logged after May 2014 even though inspectors were shown individual files relating to later complaints. Such files show prompt responses to parents' concerns but recording is not consistent or methodical. Correspondence with parents is included but minutes of meetings mentioned in letters are not included. This hinders verification of statements made in correspondence about such meetings, or about comments by external agencies.

Quality of Leadership and Management [ISSRs Part 8, paragraph 34; NMS 13.3-13.5]

The school does not meet the regulations.

Senior leaders and proprietors do not manage safeguarding arrangements effectively because in the absence of the DSL and the Early Years manager, deputising DSLs have insufficient status within the senior school and have limited awareness of whole school safeguarding procedures, such as the implementation of the revised statutory guidance of 2015. Senior leaders and the proprietors have not ensured that the DSL has had sufficiently recent training or that all staff receive effective induction training specific to the school's safeguarding arrangements. While senior leaders and proprietors have reviewed incidents where first aid was insufficient, action to implement proposed changes to staff training have not taken place. The absence of revisions to the complaints procedure and to arrangements for risk assessment in response to changes in regulations in December 2014, together with shortcomings in the school's safeguarding procedures, demonstrate that the proprietors' monitoring of compliance with regulations is insufficiently robust and that senior leaders are not currently actively promoting the well-being of pupils.

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, paragraph 7(a) and (b) and paragraph 8(a) and (b) and NMS 11

- Improve the wording and implementation of the safeguarding policy as follows:
 - ❖ Update the school's policy and procedures to meet the requirements of the most recent statutory guidance, Keeping Children Safe in Education (KCSIE) 2015 and Working Together to Safeguard Children (WTTSC) 2015
 - ❖ State that all staff are required to read Part 1 of KCSIE
 - ❖ Revise the document provided as a staff code of conduct to give full guidance regarding conduct in relation to pupils, in particular with regard to the requirements of KCSIE 2015, including advice on communication with pupils via social media, acting in a position of trust, and whistle-blowing procedures; in the light of a previous incident, include guidance on providing alcohol to pupils
 - ❖ Revise the recruitment policy to stipulate that DBS checks are required to be made at enhanced level, that checks against the prohibited list will be made for all those involved in teaching appointed since April 2012; that checks against the barred list must be obtained for all staff; expedite planned changes to procedures and recording of checks on the SCR
 - ❖ Include definitions of abuse which fully match the scope of those in KCSIE
 - ❖ State clearly that safeguarding is everybody's responsibility and that anyone can make a referral
 - ❖ Outline the role of the DSL in one coherent section of the policy
 - ❖ Provide comprehensively for training in child protection as part of induction, to include the school safeguarding policy, the staff code of conduct (covering all situations relevant to the school), whistle-blowing procedures, the identity and function of the DSL(s) and a copy of Part 1 of KCSIE; ensure that this is provided to all staff promptly on beginning work at the school
- Improve implementation of safeguarding procedures as follows:
 - ❖ Ensure that any staff deputising in the absence of the DSL have sufficient status and authority within the whole school, are aware of the school's plans for

- implementing required changes to safeguarding policy and procedures and are named as a deputy DSL within the safeguarding policy
- ❖ Ensure that records of concerns about children in need or at risk are sufficiently methodical to demonstrate that they always receive the right help at the right time to address risks and prevent issues escalating, that the DSL acts on and refers the early signs of abuse and neglect, keeps clear records, listens to the views of the pupil, reassesses concerns when situations do not improve, shares information quickly and challenges inaction
- ❖ Ensure that review of safeguarding policy and procedures by the proprietors is effective and comprehensive
- ❖ Institute a systematic, centralised method of recording training to identify that all staff have been trained in child protection, when and by whom
- ❖ Ensure that the training for the DSL takes places at two-yearly intervals as the utmost priority

Welfare, health and safety of pupils, including the safety of boarders [ISSR Part 3, paragraphs 11 & 16; NMS 6]

- Draw up and effectively implement a comprehensive written risk assessment policy

Welfare, health and safety of pupils – suitable provision of first aid [ISSR Part 3, paragraph 13; NMS 3.1]

- Ensure that first aid is provided in a timely and competent manner, in particular:
 - ❖ Provide additional training to responsible staff in how to identify and treat burns injuries as a matter of priority
 - ❖ Revise the first-aid policy to include additional guidance in the light of a previous incident on the recognition and treatment of serious burns

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

- Revise and implement the school's complaints procedure to reflect the most recent changes to requirements, in particular:
 - ❖ [Para 33 (c)] State clearly a timescale for handling Stage 2 complaints other than as indicated for complaints relating to the EYFS
 - ❖ [Para 33 (j) (ii)] Provide for a record to be kept of action taken by the school as a result of complaints which reach a formal procedure or the panel stage, regardless of whether they are upheld
 - ❖ [Para 33 (j)] Ensure the complaints log is maintained in an up-to-date manner

Quality of Leadership and Management [ISSRs Part 8, paragraph 34 (1) (a), (b) and (c); NMS 13.3-13.5]

- Ensure that senior leaders and proprietors fulfil their responsibilities to monitor compliance with regulations and ensure they are met effectively; and actively promote the well-being of pupils, in particular:
 - ❖ Improve the management of safeguarding arrangements
 - ❖ Ensure comprehensive and timely training in child protection, including on induction, for the DSL and that records of training for all staff are maintained consistently
 - ❖ Ensure that actions following review of serious incidents are implemented without delay

- ❖ Ensure that actions to meet changes in regulations are implemented in a timely manner

Other Recommendations

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

1. Improve the monitoring of behaviour and bullying by making more effective use of central recording to identify trends or patterns in pupil behaviour and types of incidents that occur.
2. Ensure that records of complaints are sufficiently detailed to verify statements made in correspondence; include minutes of meetings with parents and comments by external agencies