

**Stone Bay School**

**Independent Safeguarding Review**

**Reviewing Officer: Kel Arthur  
Independent Safeguarding Consultant  
5 September 2017**

## 1. Introduction

- 1.1 Stone Bay School is a co-educational residential/day school for children and young people aged ~~8-14~~-19 years who have Autistic Spectrum Disorder with associated communication difficulties, issues with social interactions and moderate to severe learning difficulties. There are currently 52 children on the school roll, of which almost ~~12~~0% are girls. The new academic year has seen the development of a primary age provision, which admitted 5 children at the beginning of autumn term. Information on the school website is to be updated to reflect the 8 -19 years age range.
- 1.2 An independent safeguarding review of the School's policy and practice was commissioned by Julie Ely (Head of SEN, KCC) as part of the local authority's support to schools as agreed with the KASS.
- 1.3 The specific terms of reference for the review and an outline programme for the day were agreed in advance. The core principles for the review are based on a process of evidence-based triangulation that involves a review of policy and procedure with an overview and analysis of written records and operational practice. It was also recognised that the voice of the child and the awareness of staff needed to be ascertained as part of the process.
- 1.4 The reviewing officer is an independent safeguarding consultant having previously been Principal Officer with Kent County Council. He is a qualified social worker with a post qualifying degree and an MA in Management. In addition to social work experience and having previously managed inspection and registration for the local authority, he spent many years in special education, including 9 years as Deputy Principal of a co-education residential special school for children described as having emotional and behavioural difficulties.
- 1.5 The review was undertaken on Tuesday 5 September 2017 with prior research and policy review taking place via the school's website. Full co-operation was provided by senior leaders on the day with open access to staff, children and school records facilitated as required, reflecting an open and transparent culture within the school.
- 1.6 Following introductions with Billy McInally (Headteacher) and Martyn Nash (Head of Care and DSL) the schedule for the day was finalised. Detailed contributions were made on the day by a number of staff including Joe White (Assistant Headteacher), Louvain Scott (Assistant Headteacher), Jo Berry (Student Liaison Manager) and Nikky Poulter (HR Manager).
- 1.7 Time was also spent talking informally to staff and children during the tour of the school and over lunch break in the 6<sup>th</sup> form classroom. Detail of the student council was also discussed and processes used by the school to ascertain the views of young people were explored.
- 1.8 Initial findings were shared with senior leaders at the end of the day and it was recognised that all staff that had engaged in the process had presented as enthusiastic, committed and very proud to talk about their respective area of responsibility within the school.
- 1.9 This report provides a summary of the findings of the review with recommendations for any ameliorative action required for the school to address in raising safeguarding standards.

Commented [m1]: Now updated.

## 2. Policies and Procedures

- 2.1 An audit was undertaken of school policies and procedures relevant to the safety and welfare of pupils. This was done initially via the school web site but more detailed scrutiny was applied during the visit. It is recognised that the website provides a lot of information about the school and assurance was given that parental consent has been obtained for images of children used on the website.
- 2.2 The school maintains an on-line system (Share Point) that has been developed (with initial EIS support) to provide information and records in one place that is available to all staff. The system is comprehensive and includes restricted areas with limited access (managed by NP and BMc)
- 2.3 The school website also provides detail of school policy and procedures that are divided into sections based on legislative requirements. All records accessed during the review were well-organised, stored methodically for ease of access and kept securely as required.
- 2.4 Policies on the school website are relevant and generally up to date. These are presented consistently with evidence of local authority exemplar policies being augmented with specific detail relevant to the school, which reflects a sense of ownership by senior leaders. Clear detail is also identified regarding when the respective policies were ratified by the governing body.
- 2.5 The *Child Protection Policy and Procedure* (May 2017) is based on the LA exemplar policy but *Safeguarding* is not included in the title. This should be considered as the policy covers far more than the child protection process. It captures a statement on all elements of safeguarding including allegations management, safer recruitment and the current priorities set by central government (CSE, FGM and Radicalisation). Training has been provided for all staff regarding the Prevent duty and more detail will be provided under section 6.
- 2.6 The policy provides a lot of helpful guidance to staff when dealing with issues of abuse and contact details for key personnel within and external to the school is up to date.
- 2.7 Reference is made to managing allegations against staff in this policy with a link provided to *Allegations Against Staff (Stone Bay Guidance document based on LA procedure)*. Although this policy is generally up to date referencing issues such as the abuse of trust and the anonymity clause (as outlined in KCSIE16 page 43 sections 162-165) this policy would be enhanced if reference was made to the duty to refer cases where teaching staff have been dismissed or resigned pending investigation for a safeguarding concern, to the National College for Teaching & Leadership via the Secretary of State (DBS for non teaching staff). Reference to the Safer Working Practice guidance also needs to reflect the revised version published in 2015.
- 2.8 The school has a *Whistleblowing Policy* (2017) and awareness of staff responsibilities in this regard has been highlighted during safeguarding training. A large poster on whistleblowing, bespoke to Stone Bay, was also evidenced on a staff notice board.

**Commented [m2]:** Our policy does encompass safeguarding in its wider context but worth noting the name used in current Gov guidance is the name we use and will continue to use until Government Guidance changes.  
<https://www.gov.uk/government/publications/statutory-policies-for-schools>

**Commented [m3]:** Policy has now been updated to include issues raised here.

- 2.9 The school has a *Code of Conduct (July 2017)* that makes reference to the Teacher Standards document and how staff conduct in their private life can impact on suitability in the professional role (as outlined in Safer Working Practice Guidelines (2015)). This emphasises the professional duty placed on staff to inform their employer if a safeguarding incident in their family life has involved the statutory agencies in line with the principles of the Disqualification Regulations. (Although these regulations apply specifically to staff working with children under 8, LADO recommendation is that suitability issues should apply to the children's workforce as a collective). It also includes notifying the school if staff members are engaged in other children's workforce activity during evenings or school holidays. Direct payment work for parents is a relevant example of this where role conflict could become an issue when a student's parent becomes the employer.
- 2.10 The school has an *On Line Safety and Acceptable Use Policy (2017)* that is based on a LA exemplar. This will require contact details for the LA's on line protection support being updated. This policy is being further developed with a review of the Acceptable Use Agreement taking place to coincide with the pending distribution of new computers within the school. This will also ensure that agreements are in place with students and parents.
- 2.11 Documentation and discussion confirms that on line protection issues are very much part of the wider safeguarding agenda overseen by Joe White (who has received DSL, CEOP and WRAP training) with technical support as required by IT staff. The school have a nominated governor for on line protection but the role is due to be reassigned this term.
- 2.12 Evidence was also seen of how issues are addressed within the curriculum but it is unclear if the risk to children presented by emerging technologies is well understood by all staff and the 'digital divide' is accepted as an issue with the need for further training in this area recognised. It is evident that some children and young people can bring their own device into school (mainly boarders or use by day pupils on long taxi journey). Children can access the device during the school day with staff permission but access to the internet is via the school system that monitors usage.
- 2.13 Assurance was given that the school has appropriate filters in place (Light-speed provided by EIS) that should prevent children (or staff) accessing inappropriate sites with day to day monitoring provided by staff with IT support. The school recognises that it is their more able students who are most at risk in this regard and targeted support is provided for this group to educate, raise awareness of the risks (SMART Rules) and to monitor. Assurance was also given regarding other aspects of the curriculum that help to empower children to better protect them-selves. These are delivered as part of the PSHE syllabus and in line with the school's *Relationships and Sex Education Policy (2015)* but no particular schemes of work were reviewed on the day.
- 2.14 The school has a Behaviour Principles document in addition to the *School Behaviour Policy (2015)* that provides transparent, prescriptive guidance for staff and students and is available to parents and stakeholders on the school website. The policy outlines positive reinforcement with rewards but management strategies are also defined. The policy recognises the need for physical intervention as an absolute last resort to keep a situation safe and

**Commented [m4]:** Now reassigned to Richard Farr under safeguarding with Andrew Grieve shadowing as part of our succession planning)

makes reference to the law that empowers teachers in this regard. It also confirmed the methodology used by the school (positive behaviour support) in such circumstances that is based on the PROACT SCIP model (BILD approved) with assurance given that staff have received up to date training. The school has a number of trained instructors and provide outreach services to other schools in this regard and information is included on the website.

2.15 The policy references Behaviour Support Plans and individual risk assessment, a number of which were evidenced on the day providing positive examples of policy into practice. It is also evident that the school maintains a bound log of incidents that required physical intervention in the school, with an additional bound log for incidents in the residential accommodation. There is strong evidence of management oversight and analysis taking place in this area, with data being provided to the governing body.

2.16 Although comprehensive, this policy would be further enhanced if it made reference to searching and screening guidance that empowers teachers to search a student without consent in certain circumstances (possession of a weapon or an illegal substance for [example](#)).

2.17 The school does not have an [Attendance Policy](#) but there is a statement on the maintenance of an Admissions Register and a Register of Student Attendance. In the absence of a policy document to inform practice in relation to attendance, assurance was given that the issue is taken seriously and addressed. Absence is considered critical in terms of safeguarding as children out of school are potentially at greater risk of harm. Most children are transported to school by taxi and non-attendance is picked up very quickly and followed up. Partnership working with parents is seen as a priority of the school and contact with education welfare (via Early Help where such support is now based)) is initiated if attendance becomes an issue with no plausible explanation. Some evidence was also seen of attendance data being reported to the governing body. Overall attendance for the last academic year was reported to be 93.3%. It is recommended that the school develop a policy on attendance that includes a section on Children Missing Education as emphasised in KCSIE 2016.

2.18 The [Anti-Bullying Policy \(2017\)](#) is a concise but helpful document that defines bullying and states the school's commitment to addressing concerns. Bullying incidents are recorded in behaviour records so the school does not maintain a central log of bullying incidents. Consequently, no data was available on the day regarding the prevalence of bullying within the school and this will need to be [addressed](#). Staff and children spoken to during the visit commented that although disagreements between children sometimes occur, bullying is not really an issue due to the levels of staff supervision, who provide immediate support if children indicate a concern.

2.19 The school has a [Complaints Policy \(2015\)](#) that defines what constitutes a complaint. The policy requires updating as no reference is made to escalation to the Secretary of State for further representation to be made by a complainant who remains unhappy after due process has been followed by the school. The school maintains a log of complaints as required and this includes any representations made by boarding pupils. No data was seen

**Commented [m5]:** [Now complete](#). Links to [screening and confiscation guidance](#) inserted. Due to be signed off by at FGB 7/11/2017.

**Commented [m6]:** Admission policy now developed and in place.

**Commented [m7]:** [Central Record](#) has now been developed and is in place. Discussed at [leadership meeting 25/9/2017](#)

**Commented [m8]:** [Complaints Policy](#) has now been updated in line with these comments.

regarding parental complaints but assurance was given that none of a safeguarding nature had been received during the last academic year.

2.20 The school has a comprehensive *Health and Safety Policy (2016)* that lays out roles and responsibilities including First Aid (the school has a number of trained first aiders). Health and Safety is well embedded in the school's practices and training is provided for staff in a range of related areas including the administration of medicines, lifting and handling etc. The site manager carries out regular checks of the premises re potential on site hazards and staff appear to be well informed in reporting any issues in this regard. It was also reported that the school has a SLA with SAMS for support in this area.

2.21 Risk assessment was a constant theme discussed by staff on the day in a variety of contexts and this demonstrates a good understanding of risk management strategies and how these are implemented to keep both staff and children safe. Completed risk assessments are stored on line and evidence was seen regarding both on-site and off-site activity being risk-assessed and signed-off, including educational trips.

2.22 No evidence was seen that the school has a policy for lock down and dealing with the terrorist threat and this will require attention but assurance was given about fire safety and emergency evacuation procedures put in place for both the school and the residential provision. No records were seen (or asked for) on the day of fire drills undertaken.

2.23 The school has the required *Supporting Students with Medical Conditions Policy (2016)* and provides a range of specialist support and therapies for children as part of education and health care plans. The school does not have a school nurse but many staff have received generic training (provided by Boots) regarding the administration of medicines.

2.24 The school also has 3 trained trainers in the administration of medicines (JA, DS and LT) and medical procedures due to the high level of vulnerability and need of the student group. This is an area that requires good communication with parents and colleagues, with accurate and consistent recording of information being seen as essential as part of HC Plans.

2.25 Although the policy is clear and training is provided, errors can still occur in any setting. The aspiration must be for the administration of medicines to be error free and safe, but transparent reporting of mistakes is considered a necessary safety feature in this area of provision. *'Health and social care practitioners should report all identified medicines-related patient safety incidents consistently and in a timely manner, in line with local and national patient safety reporting systems, to ensure that patient safety is not compromised NICE Guidelines 5 (2015:66).* It is therefore recommended that the school policy needs to clarify the process for staff reporting any errors immediately.

2.26 Each residential flat stores specific medicine for individual children in locked cupboards and records on the administration of medicines are maintained in the respective areas. This process is monitored by Martyn Nash (HOC and DSL) who leads on this area of responsibility. Extra security is available for any controlled drugs prescribed for children with access only by those with authorisation. Lockable fridges are also available in these areas for the storage of medicines that need to be kept cool. Signed paper copies of

**Commented [m9]:** [Lock down policy](#) has now been developed and is in place.

**Commented [m10]:** [Supporting Students with Medical Conditions Policy](#) has been updated to incorporate this suggestion.

individual health care plans are available in these areas with e-copies stored on SharePoint. It is also evident that the school commissions an annual audit from Boots in this regard and outcomes of the most recent audit were reported to be positive.

2.27 The school does not have a separate Preventing **Radicalisation** policy but the prevent duty is covered in both the Child Protection (Safeguarding) policy and the On Line Safety policy which raises awareness of staff responsibility regarding the prevention of radicalisation within the school. It is also evident that a Prevent risk assessment has not been completed and this will need to be addressed by the school. Although training in FGM has been provided for staff, the school has not formally recorded or summarised the risks based on the demographic of the student population, although it was reported that this is considered in individual cases.

**Commented [m11]:** A [prevent policy](#) has now been developed and is in place.

2.28 **Recommendation 1: School policies to be updated as outlined in section 2. It will be important to raise awareness of such policy changes with all staff to strengthen the correlation between policy and practice.**

2.29 **Recommendation 2: The school will need to complete a Prevent Risk Assessment and provide a summary of what action has been taken to raise awareness of FGM/HBV with consideration of risk recorded in relation to the student demographic.**

**Commented [m12]:** All complete, [system](#) already in place to highlight to staff changes in various policies, with this being discussed in meetings and highlighted on staff notice board.

**Commented [m13]:** [Initial Screening Prevent risk assessment](#) is now in place, when raised risk has been highlighted a further individual risk assessment has been developed for both [Prevent](#) and [FGM](#).

### 3. Safeguarding and Child Protection Practice

3.1 The school currently has a number of designated staff that manage the safeguarding and child protection processes across the disciplines of the school. All have received appropriate and up to date training (as outlined in section 6).

3.2 The senior DSL is Martyn Nash who takes overall responsibility, with support provided by Lucy Taylor (AHT), Joe White (AHT) Louvaine Scott (AHT), Jo Berry (Student Liaison Manager), Mireille Birchenough, Diane Smith (Residential Team Leaders) and Jayne Arnold as deputy DSLs on a day-to-day basis. The Headteacher and the COG were also reported to have undertaken this training to enhance understanding of the process.

3.3 As the senior DSL Martyn Nash is a member of the senior leadership Team and discussion confirmed that sufficient time is allocated for the duties of the DSL to be carried out effectively. The school will be represented by a DSL at CP conferences or strategy meetings. A copy of the HOC job description (accessed via SharePoint) provided evidence of this area of responsibility being one of the criteria required. The HT provides support and supervision to the DSL and this includes performance management appraisal. The level of support afforded to the HOC was described very positively.

3.4 It is evident that all staff have had access to a copy of part 1 of *Keeping Children Safe in Education* 2016 as advocated by the DFE and there is an audit trail to this effect. It is also advisable that senior leaders and those with responsibility for governance are given a copy of part 2 (The management of safeguarding). A copy of KCSIE (2016) was seen to be available in the staff room.

- 3.5 From discussions with various DSLs during the review it is evident that there is a good understanding of thresholds for intervention and examples of inter-agency referrals made by the school were evidenced in the records audited.
- 3.6 Safeguarding records on individual children are well-organised and retained in loose-leaf folders in a lockable cabinet stored in the HOC's office, with access only by those with DSL responsibility. Individual children's records were seen to be in good order, including welfare concern forms with DSL rationale for decision making and sign-off evidenced.
- 3.7 The files sampled do not have divided sections but records are kept in date order. The files contain a front sheet outlining some critical information about the child. However the child's status regarding parental responsibility, any court orders or private fostering arrangements for example are not included. It is also evident that the files contain an on-going chronology that provides a snapshot of involvement in line with the LA Recording Guidelines that the school follows as referenced in the CP (Safeguarding) Policy. It is also recognised that a detailed safeguarding 'running record' is maintained electronically by DSLs on each child (Synopsis) that provides information about involvement with parents and other agencies where appropriate. Although e-records are detailed and recorded in date order, it is evident however that this record of involvement was not included in the paper files sampled. Ameliorative action will be necessary to ensure paper records are complete as this is what follows the child at transition or move of school.
- 3.8 It is also evident that LAC records are kept separate to the safeguarding files. These are maintained by Jo Berry who is also DSL trained. Some of these cases involve child protection concerns that have led to care proceedings. In these circumstances it is recommended that such sensitive information be transferred to the safeguarding files, with access only by those with DSL responsibility.
- 3.9 There is evidence of cases being monitored and discussed regularly during management meetings and supervision. There are currently no children at the school who are subject of a child protection plan. Ten children are LAC (including 4 OLAs) and 25 children are open to social care as child in need with the children's disability team. Updates on such data are reported to the governing body in the Headteacher report.
- 3.10 A number of classrooms and corridors were seen to have information displayed for children and staff regarding who they should contact if they have a concern and additional related information was on display in the staff room notice board. There are also Child-Line posters evident. Display work was evident in some classrooms of a safeguarding or school ethos related theme.
- 3.11 **Recommendation 3: Update front sheet to include detail of parental responsibility, care status, court orders etc.**
- 3.12 **Recommendation 4: The school to carry out an internal audit of the LAC files transferring information from those with sensitive child protection cases to the safeguarding records.**

**Commented [m14]:** Factually incorrect all paper files have a chronology as highlighted above and are dated. The detailed Ofsted Chronology mentioned is based on this information.

Going forward we will note on the individual chronology that an action has been closed.

**Commented [m15]:** This happens but at times we are supplied all paperwork in one go with safeguarding papers in with others, when we get to any paperwork of a CP/safeguarding nature this is transferred to our CP/Safeguarding files. (papers arrived during holidays, inspection took place on day 2 after summer, just not enough time to go through all papers).

**Commented [m16]:** Now updated and complete in line with recommendations.

**Commented [m17]:** Now complete.



#### 4. Leadership and Governance

- 4.1 It was not possible to meet with the COG (Richard Farr) who is also the safeguarding lead governor and assurance was given that Richard has received appropriate safeguarding training. Discussions were therefore had with other staff regarding the leadership, management and governance arrangements of the school. Information was accessed via SharePoint regarding records of GB meetings etc. and the Headteacher was able to provide his perspective on the process of governance whilst also outlining how governor monitoring is carried out in relation to safeguarding.
- 4.2 Staff consulted on the day as part of the review, were keen to talk about their respective areas of responsibility, reflecting enthusiasm, commitment and a strong knowledge base. There is evidently confidence in Senior Leaders, particularly from a safeguarding perspective, who have guided the school through a challenging period.
- 4.3 Although only a small sample, staff and children spoken to on the day were very positive about the school provision with a clear focus being on the needs of the child. Observations confirmed a settled and welcoming environment.
- 4.4 Some discussion was had regarding governor monitoring visits and how these are recorded and reported to the GB. The decision for the COG to take responsibility for safeguarding was described as strategic to raise the profile and significance of safeguarding.
- 4.5 The Headteacher meets with the COG as Safeguarding lead at least 6 times a year and provides a briefing of school activity in this area. These meetings are not recorded so evidence of challenge or rigour in terms of holding the Headteacher to account during these visits is difficult to quantify. However, information discussed was reported to be included in the COG's report to the governing body and these are available in SharePoint.
- 4.6 Minutes of GB meetings were made available to the reviewing officer with notes confirming that safeguarding issues are discussed as a standing item. There is also recorded evidence regarding recent Headteacher oversight of the single central record. It was reported that governor oversight of the SCR also takes place but this was not evidenced on the day.
- 4.7 The issue of allegations management was also discussed with the Headteacher and DSL. An awareness of the process and need to consult with the LADO was evident. It was also reported to the reviewing officer that awareness and acceptance of responsibility by the COG in the event of an allegation being made against the HT as outlined in policy was understood but this could not be verified with the COG as no meeting took place.
- 4.8 The Headteacher was able to confirm that he has not had to deal with an allegation against a member of staff during the last academic year although the DSL has consulted appropriately with the local authority on a couple of staff conduct type issues.
- 4.9 It was also recognised that the school is currently dealing with a sensitive staffing issue due to a serious matter relating to staff conduct outside of work. The information is in the public domain with police involvement. The member of staff has resigned and the school is following procedures regarding referral to the DBS in such circumstances. The school is receiving support from the

**Commented [m18]:** We got 1 day notice of the running order, impossible to get CoG here.

LADO and SPS (commissioned service) and appear to be managing the situation and the potential impact as well as could be expected. It was also confirmed by the school that Ofsted have been notified of the situation.

4.10 From a leadership and Governance perspective it is evident that there is a great deal of trust and confidence placed in senior leaders fulfilling their roles and responsibilities in this regard. There is also a perception from senior leaders that the governing body is robust in holding the school to account for its' safeguarding policy and practice with challenge being a regular feature of governor oversight.

4.11 ***Recommendation 5: The school will need to consider how safeguarding monitoring visits are undertaken and recorded. Current arrangements provide no evidence of lead governor engagement with DSLs or visits to the residential provision.***

## 5. Safer Recruitment

- 5.1 The school's safer recruitment procedures are referenced in the Child Protection (Safeguarding) Policy but the school also has a stand-alone policy on safer recruitment. Senior leaders demonstrated a good understanding of the process in addition to the need to have trained personnel sitting on any interview panel appointing staff.
- 5.2 Assurance was given that a number of senior leaders have undertaken DFE approved safer recruitment training (which is now administered by the Safer Recruitment Consortium - with on-line training provided by the NSPCC). Further information regarding safer recruitment training will be provided in section 6
- 5.3 A meeting took place with Nikky Poulter (HR Manager) and the school's Safer Recruitment processes were discussed at length. It is evident that the school has a standard safeguarding statement inserted into all job adverts and an example was evidenced. It was also confirmed that the school uses the KCC application form and does not accept CVs alone.
- 5.4 It is also evident that any job offers made post interview are conditional on receiving satisfactory checks and references. A recent case was discussed as an example of this being applied robustly, resulting in the job offer being withdrawn.
- 5.5 NP also manages the SCR process and is responsible for ensuring robust systems are in place for recording vetting in line with requirements and ensuring that ID verifications are carried out for all staff, volunteers and governors.
- 5.6 The Single Central Record was made available to the reviewing officer. This is very comprehensive and provides more detail than is required by statutory guidance, with additional columns being added outlining a record of references undertaken for example. There are separate tabs providing detail of supply staff, volunteers, contractors and governors. There is also a separate tab for staff that no longer work at the school. External contractors are supervised at all times

**Commented [m19]:** Safeguarding responsibility has now been assigned to an individual Governor (Richard Farr), ([agreed at Governor AGM](#)) with a colleague governor shadowing as part of our Succession planning practice (Andrew Grieve). The safeguarding governor is our previous CoG so we retain his experience for another year. His reports and reviews will now be exclusively related to Child Protection and Safeguarding. All now in place.

when on site but their inclusion on the SCR will be informed by the frequency test.

- 5.7 All staff are subject to a DBS check as part of the pre-appointment check list but no subsequent DBS checks are carried out unless there is a break in service or a concern, which is in line with current national guidance. Retrospective checks have been carried out on staff appointed prior to the Children Act 1989 (which led to initial police checks being initiated in 1991). All staff on the SCR therefore have either a CRB or DBS serial number.
- 5.8 All of the columns comply with statutory requirements regarding ID and qualification verification, right to work in the UK and barred list checks, including the more recent NCTL Prohibition Check list for teachers where appropriate. The only gaps apparent relate to references not being received for a number of staff appointed more than 20 years ago. A recent leadership audit of staff personnel files has confirmed that a paper copy is not evident on file in these cases.
- 5.9 The issue has been considered by senior-management. The risks have been informally assessed and consultation has taken place with SPS. It was concluded that pursuing employer references more than 20 years after the appointment would be inappropriate. This is considered reasonable and transparent in the circumstances from a safeguarding perspective.

## **6. Safeguarding and Related Training**

- 6.1 There is evidence that the school provides regular and relevant training to its' staff that exceeds the current safeguarding training requirements within timescales. It was reported that the school maintains a central CPD record that captures specific training information for all disciplines. This is maintained by Nikky Poulter but is reliant on staff producing certificates as evidence of the training received before detail can be entered onto the system.
- 6.2 Appropriate and up to date DSL training provided by the LA has been accessed by:-
- Martyn Nash on 4/5/2017
  - Diane Smith on 21/6/16
  - Jo Berry on 28/2/17
  - Louvaine Scott on 1/10/16
  - Joe White on 23/3/17
  - Lucy Taylor on 16/11/16
  - Mireille Birchenough on 21/6/16
  - Jayne Arnold 4/1/16
  - Although not acting as a DSL, the Headteacher also received DSL training on 10/2/16.
- 6.3 The whole staff team received Safeguarding training during inset days in October 2016 provided in house by DSLs and this session included updates on Prevent, FGM and CSE. A register of

attendance was evidenced and a collective certificate provided by the Safeguarding Team.

6.4 It was reported that on line Channel Awareness Prevent training has been undertaken by all DSLs over a series of dates. Jo White leads on this area and he has received WRAP training in addition to CEOP (ThinkYouKnow) training.

6.5 Confirmation was also received regarding approved safer recruitment training undertaken by senior leaders as evidenced in the Safer Recruitment Policy. These include Nicky Todd, Tony Butt, Richard Farr, Nikky Poulter, Lou Scott, Lucy Taylor and Joe White. Although the school ensures that all interview panels consist of at least one person who has done this training, it is evident that none of the residential staff have experienced this training.

6.6 Although it is evident that the school provides a great deal of appropriate and relevant training for staff regarding First aid, SCIP, the administration of medication and medical procedures, specific dates or certificates were not reviewed as part of the process.

**6.7 Recommendation 6: It is recommended that the HOC or a Team Leader would benefit from Safer Recruitment training (that includes 2 modules of a child protection nature and covers aspects of allegations management) to enhance professional development.**

**Commented [m20]:** HoC has now completed his training 20/9/17.

## 7. Child's Right to be Heard

7.1 Section 176 of the Education Act 2002 places a duty on schools and local authorities to listen to children and it was recognised that for this review to be meaningful, systems adopted by the school to capture the voice of the child needed to be considered.

7.2 The reviewing officer joined staff and young people over lunch in the 6<sup>th</sup> form dining area and engaged in informal conversation about life at Stone bay school and how the views of children help to inform change for their benefit.

7.3 Staff were observed to be highly proficient in communicating with children who have speech and language difficulties and young people were clear that they would know who to go to if they had a concern.

7.4 Notes and agendas from Student Council meetings in school and in the residential provision are available on SharePoint and an example was displayed on an information board in the school reception area. This is presented in a visual form with symbols that children can understand.

7.5 Subsequent discussions with Louvaine Scott who leads on this area of responsibility, provided further evidence of how committed the school is to hearing the voice of the child. Notes from Student council meetings (PECS form) were evidenced with further notes on Share Point confirming meetings taking place at least three times per year.

**Commented [m21]:** Symbol form.

7.6 A range of examples of ideas raised by children that have led to improvements in school provision were evidenced, including new out-door play equipment and development of the soft-play room which are clearly

appreciated by children. Staff contributed significantly to the fund raising effort to help pay for this equipment by organising quiz nights.

7.7 It should also be recognised that the SEN annual review process provides the opportunity to capture and record the views of the child.

7.8 There are also mechanisms in place within the residential provision for children to have a degree of choice relating to how their room is personalised, what they eat and what activities they can access. There is also a complaints procedure for children as required, to raise concerns within the residential provision. There are further examples of student surveys being undertaken by the school but these were not seen on the day.

7.9 In addition to an independent Standard 20 visitor (JP) who monitors practice in the boarding provision the school also has an experienced Independent Visitor (JD) who visits the school 6 times per year to engage with children and advocate on their behalf as appropriate.

## **8. The Environment and Site Security**

8.1 The school is situated off the Eastern Esplanade in Broadstairs, with easy access to the beach, where a designated beach hut is available for use during regular beach activities.

8.2 The school is a mixture of Victorian red brick with more recent buildings added to enhance provision in the 21<sup>st</sup> century, providing what appears to be a well resourced with light and airy space in most areas which presents a welcoming environment. There is a range of interesting display work in many areas that has helped add character and ownership to the building.

8.3 The school and some of the older boarding provision have a number of staircases that require negotiation during movement around the premises. The school does not have a lift so access by a child, parent or a member of staff with a physical disability requiring a wheelchair would present a challenge. The school is aware of their responsibilities under the DDA and reasonable adjustments would be made to accommodate such a need if it was presented.

8.4 The school grounds are extensive with separate and appropriate play areas for respective age groups. There is also a 'crazy golf' course next to the school entrance, which also doubles as an assembly point in the event of a fire alarm. The perimeter fencing with substantial hedgerows in places complies with security standards and no obvious risks were identified in this regard.

8.5 The school has a main entrance off Stone Road for pedestrians and some school vehicles. There is also a large entrance off the side-road that leads to the Esplanade, with separate substantial metal gates for pedestrians and vehicles offering security when this is locked. This entrance also allows access by Taxis delivering and collecting children at the beginning and end of the school day.

8.6 There is a third gate providing pedestrian access for students with parents who need a quieter start to the school day. All main gates

- have observation cameras and are electronically controlled by the school office. They remain locked during the school day.
- 8.7 On arrival at the school at 8.40am the reviewing officer was able to observe children arriving by taxi. This is a busy period that the school manages well, with good levels of staff supervision to control the flow of traffic into the school and to support children on arrival. The role of transporting vulnerable children to and from school is a critical one in terms of safeguarding. It is commendable that the Headteacher has recently provided awareness training for up to 35 taxi drivers and escorts at the school's expense to promote better understanding of the needs of the children that they transport.
- 8.8 There were numerous discussions during the review about risk assessment and how this appears to be embedded within the culture of the school. All activities and behaviour plans are risk assessed and information sharing with parents and other agencies helps to inform behavioural risk management.
- 8.9 Visitors are asked for ID then sign into the electronic visitor register, which also requires a photograph. They are then issued with a visitor pass on a red lanyard but these do not differentiate between visitors who have been vetted and allowed unsupervised access to children and those who have not. All visitors are provided with a safeguarding and health & safety leaflet on arrival reminding them of their responsibilities whilst on site – which is a further example of good practice.
- 8.10 The school does not have a Lettings Policy but it was confirmed that they do not hire out any aspect of the school premises to outside agencies.
- 8.11 Staffing ratios around the school appear to be very good with interactions between staff and children observed to be positive, patient and supportive.
- 8.12 No records were seen or asked for regarding fire drills during the visit but assurance was given that these are held on a regular basis.

## **9. Boarding Standards**

- 9.1 Ofsted have provided detailed scrutiny of the school's residential provision during the latest Care Standards inspection carried out between 21 and 23 February 2017 when the school was judged to be outstanding overall. Consequently, the terms of reference for this review did not require individual care standards to be considered, however, it was felt necessary to review the processes adopted by the school to monitor and report on the standards of care provided to vulnerable children.
- 9.2 Stone Bay school has the required Statement of Purpose that sets out the residential provision and information is available to parents and stakeholders on the website. It is also recognised that many aspects of the policy and procedures required to keep

children safe in residential special schools have already been referenced in previous sections of this report as part of the school's overarching safeguarding responsibilities.

- 9.3 The school is working on strengthening the area identified for improvement by Ofsted that focused on continuing the PHSE curriculum into the boarding provision to maximise outcomes for children 'There is a strong PHSE provision within the curriculum that teaches pupils about their personal safety but this is not carried on within the residential time.' This review has seen evidence of care planning and key-working taking place that does address issues such as personal safety but more joined up work and consistent recording methodology across the disciplines will provide a stronger audit trail to this effect.
- 9.4 There was a lot of evidence gathered during the day regarding how the school and residential staff work closely together. A further example of this is the newly appointed Speech & Language Therapist planning to work across the disciplines. Information is shared regularly with main safeguarding files being retained in the DSL/HOC office, with the deputy DSLs (including 2 residential team leaders) also having access.
- 9.5 Discussions with senior leaders reflected a degree of pride in the outstanding judgement but the Headteacher is very clear that complacency will not be allowed to impact on standards of care.
- 9.6 The residential provision offers well resourced, purpose built (more recent developments) but homely living environments for small groups of children. There are 5 residential flats available to accommodate children but due to numbers of boarding pupils falling to 20 (including 4 girls in separate provision) only 4 flats are currently operational. If residential referrals to the school increase however, this space will revert to providing accommodation for up to 30 children.
- 9.7 The school offers weekly boarding Monday to Thursday nights with no weekend provision. It is evident that planning and consultation with children and staff takes place regarding how the group is accommodated. All boarders have a single room and a choice in how their room is personalised with support from staff and parents. Toilet and bathroom facilities are communal in each flat and provision is of a good standard with a combination of wet rooms, baths and showers available.
- 9.8 There is a communal living area and a kitchen/dining area in each flat where children can help prepare breakfast and evening meals.
- 9.9 The school does not have a Lettings Policy and the residential provision is for the exclusive use of Stone Bay pupils.
- 9.10 In addition to an independent visitor advocating for children as referenced previously, the school has the required Standard 20 visitor. This role is carried out by Jimmy Peters who is an experienced social care practitioner with residential experience.

**Commented [m22]:** A5 progress and target setting folders are now in place to share PSHE programmes of study relevant to individual boarders.

JP is also a school governor, which does raise potential questions about the degree of 'independence' afforded to this role. Standard 20 visits are a national minimum standard requirement that should be separate to school governor monitoring arrangements.

- 9.11 Reports of visits were sampled and these are carried out unannounced six times per year in line with the NMS. There is evidence of rigour being applied and challenge where appropriate. These reports are considered by senior leaders and also help to inform the Ofsted inspection process.
- 9.12 Good communication across the disciplines is a strong feature of practice within the school. It is evident that senior leaders receive a morning briefing from the HOC (who provides on-call cover on a rota basis with senior colleagues for the residential setting) on any significant issues from the night before that might impact on the school day.
- 9.13 Residential staff, have historically worked split shifts to provide care to children before and after school and this work pattern is well established and suits the provision.
- 9.14 Although the school does not have a supervision policy, there is evidence of residential staff receiving regular recorded supervision and annual appraisal. The school also produces a matrix with supervision dates planned in advance for all staff providing further evidence of pro-active management.
- 9.15 Overnight supervision of children involves up to 6 waking night staff with 6 sleep-in staff to support any child in a crisis during the night. High staffing ratios are also maintained due to the required capacity to manage a fire or other major incident requiring vulnerable autistic children needing to be evacuated from the school during the night. These staffing ratios are based on a school risk assessment in such circumstances.

**Commented [m23]:** National minimum standards highlight that standard 20 visits can be carried out by Governors.

## 10. Conclusions and Safe Working Practice

- 10.1 It is recognised that the review visit was a snapshot of a day in the life of Stone Bay School but there is no doubt from the overview of records, observations and interactions with young people and key staff, that the safety, welfare and interests of children are regarded as paramount across the wider school provision.
- 10.2 There is no doubt that staff and leaders know their students very well and communication strategies are employed effectively with different children. This was evidenced when discussing cases and when staff members were observed to be responding to individual children and groups. Staff demonstrated a heightened awareness and understanding of their responsibilities and interactions between staff and children were observed to be relaxed and respectful. Minor incidents of



challenging behaviour observed on the day were managed calmly and competently with the use of strategies such as distraction, redirection and planned ignoring, being used effectively.

- 10.3 On the evidence gathered during the day it is clear that the school places high expectations on staff, regarding both conduct and safety. Senior leaders were described as demanding but supportive and receptive to challenge where appropriate. From discussion and observations on the day, it is evident that a safe working culture has been developed within the school that helps to create a positive environment for children to live and learn.
- 10.4 There is no urgent ameliorative action required by the school but there are a number of recommendations from this review for the school to consider that will enhance standards of safeguarding practice. It is considered that the school has the capacity to improve within timeframes built into the action plan agreed following this review.

#### 11. Recommendations:

- 11.1 Recommendation 1: School policies to be updated as outlined in section 2. It will be important to raise awareness of such policy changes with all staff to strengthen the correlation between policy and practice.
- 11.2 Recommendation 2: The school will need to complete a Prevent Risk Assessment and provide a summary of what action has been taken to raise awareness of FGM/HBV with consideration of risk recorded in relation to the student demographic.
- 11.3 Recommendation 3: Update front sheet to include detail of parental responsibility, care status, court orders etc.
- 11.4 Recommendation 4: The school to carry out an internal audit of the LAC files transferring information from those with sensitive child protection cases to the safeguarding records.
- 11.5 Recommendation 5: The school will need to consider how safeguarding monitoring visits are undertaken and recorded. Current arrangements provide no evidence of lead governor engagement with DSLs or visits to the residential provision.
- 11.6 Recommendation 6: It is recommended that the HOC or a Team Leader would benefit from Safer Recruitment training (that includes 2 modules of a child protection nature and covers aspects of allegations management) to enhance professional development.

**Commented [m24]:** All policies have now been updated, with only school behaviour to be signed off. This has been updated in line with recommendations and is due for sign off: FGB 7/11/17

**Commented [m25]:** Risk assessments in place, record of what has been done is in the responding action plan to this review.

**Commented [m26]:** Complete.

**Commented [m27]:** Complete all relevant files are now transferred.

**Commented [m28]:** School now has a governor with specific responsibility for Child Protection and Safeguarding (with a succession plan in place to replace him) Safeguarding will continue to form part of the discussions between co chairs of Governors and the Headteacher.

**Commented [m29]:** HoC has now completed this training.

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