

## Dover College

Effingham Crescent, Dover, Kent, CT17 9RH

**Date of visit** 21 September 2015

### Purpose of visit

This was an unannounced visit carried out at the request of the DfE, to focus on the compliance of the school with the Education (Independent School Standards) Regulations 2014 (ISSRs), particularly, those concerned with safeguarding, in particular the handling of allegations against staff, guidance to staff on appropriate behaviour; leadership and management of the school.

### Characteristics of the School

The school is a co-educational day and boarding school in the centre of Dover and educates pupils from the ages of 3 to 18. Founded in 1871 and reconstituted by Royal Charter in 1923 it is based in the grounds of a former Benedictine priory and includes many historic buildings. The school is administered by a board of governors. At the time of the visit, 297 pupils were on the roll. No pupils have an education, health and care plan (EHC) plan. There are 56 pupils identified as having special educational needs and/or disabilities (SEND) and 85 have English as an additional language. The previous ISI inspection was in November 2014.

### Inspection findings

#### **Welfare, health and safety of pupils – safeguarding [ISSRs Part 3, paragraphs 7 (a) and (b); EYFS 3.4 to 3.8]**

The school does not meet the regulations.

The school does not meet the regulations because the safeguarding policy in use at the time of the visit omitted a number of required details. Furthermore, at the time of the inspection this policy was not posted on the school website. However, in practice the procedures are effective and provide appropriate support for pupils' needs.

During the course of the visit, the school provided inspectors with the most recent version of the policy, awaiting approval by governors. This policy contained a number of improvements but some omissions remain, as outlined below.

The most recent revision of the safeguarding policy shows concern for pupils and identifies the need to safeguard children at risk and those in need. Pupils confirm that they know who to go to if they have a concern and are confident they will be listened to. Limited mention is

made in the policy of the needs of pupils who are boarders, although suitable arrangements are included in the event of an allegation being made against a member of staff resident in boarding.

The policy acknowledges guidance from the Local Safeguarding Children Board (LSCB), and makes suitable references to statutory guidance, including *Keeping Children Safe in Education 2015* (KCSIE) and *Working Together to Safeguard Children 2015*. It does not include the elements most recently identified as requisite: contact details for advice and support about extremism; relevant contact details and the requirement to report female genital mutilation (FGM) to local police from October 2015; a protocol to ensure that visiting speakers are suitable and appropriately supervised. The designated safeguarding lead (DSL) showed appropriate awareness of these areas, was booked to attend a suitable course focused on these elements, and had already established plans for whole-staff training on completion.

The recruitment policy is comprehensive. The safeguarding policy includes a comprehensive staff code of conduct which reflects the school. This includes helpful guidance including reference to breach of trust between staff and pupils, one-to-one working with pupils and use of social media. Staff show effective understanding of appropriate conduct in regard to these areas. Reference is made in the safeguarding policy to a whistleblowing policy and staff understand its provisions but it is not specified in the policy that this document forms part of induction training in child protection. Newly appointed staff confirmed that it is included in practice. Staff express confidence that they may raise a concern without prejudice to their own position.

The policy includes suitable definitions of abuse and provides sufficient guidance regarding possible abuse by one or more pupils against another pupil, including linking such abuse to bullying.

Discussion with the designated safeguarding lead (DSL) confirmed that pupils receive the right help at the right time to address risks and prevent issues escalating and this is supported in child protection records. The DSL acts on and refers the early signs of abuse and neglect, identifies the potential for radicalisation, keeps clear records, listens to the views of the pupil, reassesses concerns when situations do not improve, shares information quickly and challenges inaction, as required by KCSIE. This includes effective monitoring of children in need. Effective communication is maintained with parents where appropriate in the context of any incident.

The policy identifies most safeguarding elements relevant to the context of the school. It provides for pupils to receive guidance on staying safe, including e-safety and filtering access to the internet. The policy lacks specific reference to FGM or children missing education, as opposed to pupils who go missing from school.

The school's safeguarding policy shows awareness of the procedures of the local children's services, Kent. It 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. It confirms that anyone can make a referral. The policy confirms that the DSL works closely with local agencies and this is evident from written records. It requires prompt contact with children's social care where there are concerns that a child may be in need of help or at risk and this is implemented. The policy gives contact details for required local agencies but not for guidance about the Prevent strategy.

The policy makes appropriate provision for handling allegations against staff, including provision for reporting to the police, although the effectiveness of the guidance given is

diluted by repetitions with variations in wording. Staff understand their responsibilities and show readiness to fulfil them. They stated that any concerns they had about the behaviour of a member of staff would be referred to the DSL, even if a vague suspicion. Staff have reported incidents of unprofessional behaviour appropriately in known incidents. The policy provides for reporting any person whose services are no longer used where referral criteria are met to DBS and/or NCTL. The school acts promptly on any allegations against staff but has in the past pre-empted the role of the local designated officer (DO) by beginning investigation before referral to this figure. This shortcoming is acknowledged by the school and has been discussed with the DO whose role in presiding over any investigation is now understood clearly. The school has followed advice effectively since that point and is currently awaiting instruction regarding referral to DBS or NCTL in the same matter.

The policy names an individual to take responsibility for child protection matters in the school, together with an alternative person in the absence of the DSL. The status of both figures is appropriate. The policy does not include contact numbers for these figures or for the governor nominated to liaise on matters of safeguarding.

The policy requires that any deficiencies or weaknesses in child protection arrangements are remedied without delay, and provides for annual review by the governors. This is broadly effective, evidenced by the review being carried out at the time of the inspection, although not all required elements are currently included in the policy. The policy identifies a governor to liaise regarding safeguarding, but does not clarify that this role includes liaising with the local safeguarding board and other agencies.

The training for the DSLs is appropriate. Individual records of training are held in the school for teaching and non-teaching staff. These enable the training given to an individual to be confirmed but the lack of a centralised record for all staff inhibits clear identification of whether all staff have been trained, by whom, and those whose training requires updating. Training is stipulated for volunteers and temporary staff on induction, but not all the required elements for induction are specified. In interview, staff, including those new to the school in the current term were familiar with all the required elements.

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

The school does not meet the regulation.

The current arrangements for safeguarding were not published on the school's internet website at the time of the inspection. \_

#### **Quality of Leadership and Management [ISSRs Part 8, paragraph 34]**

The school meets the regulation.

Senior leaders take action when safeguarding issues occur, in particular allegations against staff, although these have not always been fully in line with local procedures because precipitate action has been taken. Inspection confirmed that current understanding is clear following guidance from the DO. Record keeping is suitable when such incidents occur and enables actions and timescales to be identified. Governors and senior managers review incidents of staff misconduct effectively and strengthen guidance to staff in response. Senior leaders consistently promote the well-being of pupils, particularly by re-inforcing staff understanding of appropriate behaviour.

### **Regulatory action points**

The school does not meet all the requirements of the Independent School Standards Regulations 2014, National Minimum Standards for Boarding Schools 2015 and requirements of the Early Years Statutory Framework.

**ISSRs 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:

- Ensure the safeguarding policy gives contact details for advice and support about extremism and includes a protocol to ensure that visiting speakers are suitable and appropriately supervised; gives relevant contact details and the requirement to report FGM to local police from October 2015; and includes contact numbers for the DSLs and the designated governor for safeguarding;
- Ensure the guidance about reporting allegations against staff is implemented in full, in particular, that the local DO presides from the outset in any investigation and that any allegation is referred to the DO immediately;
- Make specific references to safeguarding elements relevant to the school's context, to include: guarding against pupil-on-pupil abuse in boarding; FGM; and children missing education;
- Clarify that the role of the safeguarding governor includes liaising with the local safeguarding board and other agencies;
- Specify that the whistleblowing policy forms part of induction training in child protection for staff;
- Maintain a centralised record for all staff to identify whether all staff have been trained, by whom, and whose training requires updating.

**ISSRs Part 6, Provision of information, paragraph 32(1)(c)**

Publish the school's current arrangements for safeguarding on the school's internet website at all times.