

## Tower College

Mill Lane, Rainhill, Prescot, Merseyside, L35 6NE

**Date of visit** 15th May 2015

### Purpose of visit

This was an unannounced emergency visit at the request of the Department for Education which focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs), particularly those concerned with the welfare, health and safety of pupils, the handling of parental complaints and concerns in relation to premises.

### Characteristics of the School

Tower College is a co-educational day school for pupils aged three to sixteen founded in 1948 by the parents of the current principal. The school, situated in Rainhill, Merseyside, occupies a nineteenth century house, The Tower, together with a range of purpose -built accommodation and grounds. Pupils come from a wide catchment area covering Cheshire, Lancashire and Merseyside. The school is a registered charity and operates as a limited company which is the registered proprietorial body. A board of governors oversees the work of the school.

At the time of the visit there were 400 pupils in the school of whom three had English as an additional language. Six pupils had statements of special educational need and a further twenty-five had been identified as having special educational needs and/or disabilities.

### Inspection findings

#### Safeguarding [ISSR Paragraph 7(a)&(b)]

The regulation is not met.

The school's safeguarding policy and procedures have not been updated in line with current requirements, making no reference to *Keeping Children Safe In Education* (KCSIE). The policy refers to a recruitment policy but no such policy is evident. The Designated Safeguarding Leads (DSLs) have undergone recent training as have a majority of staff, however as no overall log of staff safeguarding training is kept the school cannot easily identify whether training for all staff is appropriate and up to date. Safeguarding is included in the induction programme for all new staff. The DSLs say that relations with the local safeguarding authority are good but that they do not often contact the LADO informally. No evidence of any informal contact was seen. Staff understand the importance of safeguarding but their lack of knowledge and training in current policy and procedure means that their awareness of their roles and responsibilities is insufficient.

The governors rely on the school to update policy and procedure and, although they have opportunity to scrutinise any changes, a formal annual review has not occurred.

### **Behaviour [ISSR Paragraph 9]**

The regulation is not met.

In discussion, pupils showed a clear understanding of the school's rules and regulations and the range of sanctions which would be imposed for a breach of these, although some felt minor sanctions were not always applied consistently by staff. All breaches of school rules or occurrence of unacceptable behaviour, together with any sanction applied, are centrally logged by staff on a daily basis. The log is monitored informally by tutors and heads of section who may bring individual pupils to the notice of all staff at the weekly briefing. The principal and vice principal monitor the log formally at the end of each week after which pupils may be put in detention or, for more serious or repeated offences, given an order mark or suspension. Scrutiny of the log shows that the school policy for detentions and order marks is properly applied. The school's sanctions policy, as presented to parents and pupils, is proscriptive. Parents are notified in writing of the sanction and the specific circumstances surrounding it. Parents may also be invited to come in to discuss the matter with the principal. In the case of a serious breach of rules or of unacceptable behaviour the principal having, in most cases, consulted staff deals with the incident immediately. The principal may use her discretion when imposing the more serious sanctions rather than adhering to the published policy. Appropriate records are kept of all serious sanctions and scrutiny of these records indicates that the policy is not always strictly adhered to.

### **Preventing bullying [ISSR Paragraph 10]**

The regulation is met.

Pupils have a clear understanding of bullying, including cyber-bullying, and are confident that any incident that is reported will be dealt with quickly and sensitively. They say that relationships between pupils and between pupils and staff are very good and that there is always someone for them to talk to when necessary. Incidents of bullying, which are rare, are recorded on the general behaviour log and monitored by the vice principal who has overall responsibility for pastoral care. There is no evidence of any specific type of bullying being prevalent. Most PHSE topics, including bullying are well covered in assembly, form periods and across the curriculum. Recent successful initiatives have been put in place to improve staff, pupil and parent understanding of the dangers of cyber-bullying.

### **Health and safety and supervision [ISSR Paragraphs 11, 14 and 16]**

The regulation is not met.

The school has a health and safety policy but no risk assessment policy. Risk assessments have been carried out for a wide range of activities, including visits but many of these are out-dated and are insufficiently focused on the specific risks to pupils in the context of each visit or activity. The school ensures that access to the buildings is secure and that the outdoor areas used by pupils are carefully monitored by electronic and other means. Supervision of pupils of all ages is comprehensive, as was observed during pupil free time and when pupils were moving between buildings and about the campus during lessons. Overall responsibility for supervision of pupils lies with the principal and heads of section who devise and monitor the systems.

### **Provision of information [ISSR Paragraph 32]**

The regulation is met.

Information not available on the website is made available readily to parents and prospective parents in the school prospectus and by the school office.

### **Manner in which complaints are handled [ISSR Paragraph 33]**

The regulation is not met.

The complaints policy does not meet the current regulations having a number of omissions and also incorrect references to other documentation. In particular, no mention is made of a panel member being independent of the management and running of the school, of the panel findings being available on the premises or record keeping regarding the stage at which a complaint is resolved. Timelines for handling each stage of the complaints process are clear and appropriate.

Discussions with the principal and chairman of governors and examination of documentation made available indicate that only one formal complaint had been received by the school since the previous inspection. Records indicate that the complaint had been handled in line with the school's current, but non-compliant, policy. Records are kept of all informal complaints received, normally in the form of an email to all those concerned and the principal. Except in exceptional circumstances all communication between the school and the parents takes place through the principal rather than individual staff. No central record of complaints is held.

### **Regulatory action points**

The school does not meet all the requirements of the Education (Independent School Standards) Regulations 2014.

#### ISSR Part 3, Welfare, Health and Safety, paragraph 7(a) and (b)

Improve the wording of the safeguarding policy as follows:

- Remove all out of date references and include clear reference to Keeping Children Safe in Education (March 2015) and Working Together to Safeguard Children (March 2015).
- Include specific details of the school's recruitment procedures or make reference to a separate policy.
- Specify the school's whistleblowing procedures or make reference to a separate policy.
- Include reference to how the school manages concerns in relation to children in need and children at risk of harm.
- Make clear that safeguarding is the responsibility of everyone.

Improve the implementation of the safeguarding policy as follows:

- Provide all staff with a copy of the updated policy and a copy of KCSIE 2015 Part 1.
- Provide training for all staff to ensure they have a clear understanding of their roles and responsibilities.
- Keep accurate and centralised records of all staff training in safeguarding.
- Update the induction programme for new staff in line with the requirements of KCSIE 2015.

- Introduce a rigorous and fully documented system by which governors conduct their annual review of safeguarding.

ISSR Part 3, Welfare, Health and Safety, paragraph 9(b), 11 and paragraph 16(a) and (b)

1. Improve the implementation of the behaviour policy by greater transparency with regard to the imposition of the most serious sanctions and by explaining fully any deviation from stated policy.
2. Draw up and implement effectively a risk assessment policy.
3. Carry out risk assessments where necessary focused closely on the particular circumstances.

ISSR Part 7 Manner in which complaints are handled, paragraph 33 (g), (i)(ii), (j)(i)(ii)

Improve the wording and implementation of the policy as follows:

- Include mention that one panel member will independent of the management and running of the school.
- Specify that the panel findings will be being available on the premises.
- Keep a log of all complaints that are made in accordance with the formal procedure and whether they are resolved following the formal procedure or proceed to a panel hearing; and action taken by the school as a result of those complaints (regardless of whether they are upheld).

## **Other Recommendations**

1. Review and update all policies, including for PSHE, to ensure that they better reflect national guidance.