

## INDEPENDENT REVIEW OF SAFEGUARDING POLICIES, PROCEDURES AND CULTURE AT ST PAUL'S SCHOOL AND COLET COURT – BARNES

### ST PAUL'S SCHOOL AND COLET COURT ACTION PLAN

JUNE 2015

This update has been approved by the Badman Working Group.

The Badman Working Group has been established by the GB to oversee the implementation of the recommendations from the Badman Review. It comprises five governors, including the Vice Chair of the GB, the Child Protection Governor, the Chair and other members of the Education Committee and the E Safety Governor.

#### **Introduction**

The Independent Review of Safeguarding Policies, Procedures and Culture at St Paul's School and Colet Court – Barnes (Independent Review) was commissioned by the Governing Body of St Paul's School and Colet Court in June 2014 to audit the safeguarding policies, systems and culture of the schools and identify areas for improvement and development. The final Independent Review report was presented to the Governing Body on 9 February 2015. The report confirms St Paul's School and Colet Court are fully compliant with statutory requirements. It contains a number of recommendations for the Governing Body to enable the schools to move from compliance to become a centre of excellent practice. This Action Plan details the schools' response to the recommendations made in the Independent Review report. As recommended by the Independent Review team, the Governing Body issued this timed Action Plan within 30 days of receipt of the Independent Review Report.

#### **Independent Review Report Terms of Reference (TOR 3)**

*'Make recommendations for any reform of the schools' current policies and practices to create a culture and system of safeguarding that goes beyond the statutory criteria which will be regarded as a leader in the field of UK independent education.'*

	RECOMMENDATION RATING	ACTION STATUS	
R	<i>Recommendations to embed current compliance with legal requirement</i>	<i>Outstanding and remains to be actioned</i>	
A	<i>Good practice recommendations to assist the GB in complying with their duty to act in the best interests of the charity and its beneficiaries</i>	<i>Change underway – work in progress (WIP)</i>	
G	<i>Best practice recommendations</i>	<i>Change embedded into business as usual (BAU)</i>	
SPS/ CC	<i>St Paul's School/ Colet Court</i>	EC	<i>Education Committee (GB Committee)</i>
GB	<i>Governing Body</i>	BWG	<i>Badman Working Group (GB Working Group)</i>
CCC	<i>Colet Court Committee (GB Committee)</i>		
NRC	<i>Nominations and Remuneration Committee (GB Committee)</i>		

## ST PAUL'S SCHOOL AND COLET COURT ACTION PLAN

NO	RATING	INDEPENDENT REVIEW RECOMMENDATIONS FOR GOVERNING BODY	SCHOOLS' RESPONSE		DATE	STATUS
			ACTION ALREADY TAKEN	ACTION TO BE TAKEN		
<b>1</b>		<b>FURTHER DEVELOPING POSITIVE CULTURE AND PRACTICE IN SAFEGUARDING AND WELL BEING</b>				
1.a	G	GB to promote closer liaison between CC and SPS to strengthen areas of common culture in the two schools.	<p>GB considered wide ranging changes to bring SPS and CC closer together as part of strategic discussion of 'open access' at the GB Away Day (April 2015). GB has established a committee to explore and propose changes (April 2015).</p> <p>CC and SPS SMT have committed to work together to further initial ideas. Safeguarding initiatives in place:</p> <ul style="list-style-type: none"> <li>• New role of 'Safeguarding Coordinator' created and appointed in May 2015 to promote consistency and common culture across SPS and CC.</li> <li>• Termly meetings between SPS &amp; CC DSLs, deputy DSLs and Safeguarding Coordinator prior to visit of Child Protection Governor (CPG).</li> <li>• CC and SPS DSLs attend training and development sessions together (e.g. on prevention of bullying and mental health issues).</li> </ul>	<p>GB committee initial recommendations to be presented to GB Autumn 2015</p> <p>New initiatives to promote closer working will continue to be sought and implemented by CC &amp; SPS SMT– ongoing process.</p>	Autumn 2015	WIP
1.b	G	GB to repeat the pupil survey annually to gain trend data; to determine the voice of the pupil as part of the audit of policy and practice; and to test the presiding management culture within the schools.	<p><b>Pupil Survey:</b> Pupil survey will take place annually simultaneously across SPS and CC. Survey questions will be reviewed and submitted for CCC and EC approval in Autumn term. EC and CCC will receive full survey reports and report to GB. GB to scrutinise trend and culture data.</p> <p><b>Staff Appraisal:</b> GB Education Committee approved SPS SMT recommendation to include 'pupil voice' in revised appraisal system for SPS academic staff, boarding staff and sports coaches and, where</p>	<p>Ongoing annual process in place.</p> <p>Revised appraisal systems to be introduced from September 2015 and monitored – ongoing process.</p>	On-going annual process	BAU

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			<p>appropriate, support staff. CC SMT reviewed CC teaching staff appraisal (May 2015) and will submit proposals to CC Education Committee for consultation in June 2015.</p> <p><b>Guidance:</b> Documents summarising pupil voice mechanisms produced for CC and SPS (Autumn 2014) and published on websites and parent handbooks/portals (Spring 2015). Subject to annual update and review.</p>	Annual review and update	On-going annual process	
1.b	A	Particular focus should be given to pupils' responses to reporting of bullying incidents, feeling safe at school and willingness to talk to a tutor. Governors should satisfy themselves that the schools are routinely developing their knowledge of understanding of these areas by accessing new research and information about evolving practice and utilising information to improve support for pupils at school	SPS Designated Safeguarding Leads (DSLs) have attended training seminars on specific aspects of bullying and mental health issues; SPS staff INSET safeguarding training (January 2015); new intranet page with details and links established (cross refer 2.b); assembly programme for pupils February 2015.	Details of specific training and attendance at relevant conferences will be reported routinely to SPS & CC SMT and GB- ongoing process.	On-going process	BAU
			New iSAMS fields (pupil welfare (current) and pupil welfare (archived)) (February 2015) introduced to record concerns about pupils, including bullying concerns, to enhance communication of issues to all teaching staff and aid transfer of pastoral information from one year to the next.	Transfer of information to SPS under review (Autumn 2015).	Autumn 2015	WIP
			Safeguarding Coordinator (appointed May 2015) joins weekly SPS Undermaster meetings and some CC SMT meetings to advise on case conferences.	-	On-going work-stream	BAU

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			<p>CC took part in 'National Anti-bullying Week' in November 2014; all form rooms now have a 'pupil welfare' box for any concerns to be reported to Form Tutors (implemented February 2015); an intranet page has been produced with links to CEOP and Child Line and to a form where concerns can be reported online (implemented January 2015 and revised February 2015).</p> <p>SPS Poster campaigns and assemblies targeting homophobic bullying and publicising ways of raising concerns (February 2015). New role of Assistant PSCHE Coordinator created and appointed in SPS (April 2015) with mandate to design an excellent programme for identifying and reporting bullying behaviour in adolescent years.</p> <p>CCC and EC reviewed provision of safeguarding education to pupils (February &amp; May 2015) and will continue to oversee.</p>	<p>CC to run a workshop for parents in Autumn 2015 (and then annually) on pastoral care and pupil welfare for this specific age group and to increase awareness of existing provision, including bullying and how it can be prevented.</p> <p>-</p> <p>-</p>	<p>Autumn 2015 and then ongoing annual process</p> <p>On-going work-stream</p> <p>On-going process</p>	<p>WIP</p> <p>BAU</p>
1.c	A	<p>GB to consider alongside the evidence of action and effectiveness of the anti-bullying policy data of boys known to be suffering from any mental health problems requiring counselling or CAMHS support (this should be anonymised and not include names only year groups) and the correlation with boys reporting incidents of bullying, ensuring that all boys are accessing support services as appropriate.</p>	<p>Revised SPS reporting and response protocols introduced (January 2015). Confidential assessments are undertaken by SPS/ CC DSLs. Anonymised data from school-led 'early help', CAF referrals, CAMHS/ private counselling, therapist referrals are brought to the attention of the pastoral team and compared to bullying incidents. Any correlations considered and incorporated into review process through anonymised reports to EC and CCC.</p> <p>CC set up a confidential register of referrals to School Counsellor to track those pupils who also appear on the bullying register (February 2015). All pupil referrals to the School Counsellor are discussed at CC</p>	<p>Ongoing annual process in place.</p> <p>Ongoing annual process in place.</p>	<p>Ongoing process.</p> <p>Ongoing process</p>	<p>BAU</p>

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			SMT and agreed with parents, before the pupil is referred (existing practice since 2010).			
1.d		GB to ensure processes are in place to ensure triangulation of statements from the 'open' section of the pupil survey with other information or possible concerns held by managers.	Triangulation completed in October 2014 with boys who identified themselves through the surveys. SPS and CC SMT have formally reviewed all 'open' comments in the pupil surveys and correlated the results with other sources of pupil information held by HODs/ managers (March 2015) and have implemented change where appropriate. This will be repeated annually as part of the pupil survey analysis.	Ongoing annual process in place.	Ongoing annual process	BAU
1.e	R	GB to action a review of the procedures for supervising those younger boys staying on site after hours to ensure that the responsibility of staff for their welfare is clearly defined; and then to ensure that the tightened arrangements and procedures are implemented by staff and communicated to parents and boys.	CC SMT completed review in February 15 and all actions implemented; reminders issued to boys, parents and all staff involved in after school clubs and parents' handbook updated.	Completion of this review will be reported to CCC and GB in June 2015.	June 2015	BAU
<b>2</b>		<b>IMPROVING COMMUNICATION WITH PARENTS AND IMPROVING VISIBILITY AND TRANSPARENCY OF THE GOVERNING BODY</b>				
2.a	G	GB to determine new ways of improving the accessibility of school policies. Where parents and students need to understand them with ease, more user friendly summaries should be developed.	SPS/CC SMT have revised the location and accessibility of the suite of safeguarding policies on the website (see 2.b below). DSL's have reviewed the layout and content of the key safeguarding policies and produced user friendly summaries where appropriate for the parent portal on the website and for the pupil intranet. The CC Parents' Handbook (updated Feb 15) provides a list of policies that are available on the intranet and brief summaries of three	-	-	BAU

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			key policies.			
2.b	R	GB to require a direct link be made to the Safeguarding and Child Protection Policy on the home page of the school web-site.	Completed February 2015 (www.stpaulsschool.org.uk/safeguarding)	-	-	BAU
2.c	G	GB to establish a communication group of senior staff, parents and governors to review means and style of communication and offer a collective voice for the school and then publicises and measures the effectiveness of its initiatives.	New post of Communications & Marketing Officer (CMO) created and appointed (May 2015).  GB has established a committee which will consider all aspects of communications with parents, and CMO to implement. GB considers this to be the most suitable structure for a charitable company limited by guarantee.	GB subcommittee to progress.	Ongoing work-stream	BAU
2.d	G	GB to strengthen the Board and its sub committees, through co-optation of more governors who are parents or, preferably through the election of parent representatives as governors onto the Governing Body.	GB appointed of three additional governors according to skills set and expertise. One is the parent of former SPS pupils (Spring 2015).	NRC will consider parent representation in June 2015 and report to GB June 2015. GB to consider in the context of the full GB skill set and the need to manage conflicts of interest.	June 2015	BAU
<b>3</b>		<b>IMPROVING GOVERNORS' MANAGEMENT INFORMATION AND OVERSIGHT OF EXECUTIVE</b>				
3.a	R	GB to monitor the issues raised by the Local Authority and satisfy themselves that they can evidence exemplary policy and practice in regard to same.	High Master and Headmaster met with Local Safeguarding Children Board (LSCB) Chair (February 2015).  New role of Safeguarding Coordinator created and appointed in May 2015. Appointee has significant experience in LA Safeguarding.  On-going monitoring by Child Protection Governor (CPG) through Annual Safeguarding Audit. CPG will	Annual Safeguarding Audit is an ongoing process  -  -	Ongoing annual process  -	BAU

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			report annually to GB. The four issues raised by the LA are generic requirements which will be added to the Annual Safeguarding Audit template for comment by the CPG each year.			
3.b	G	GB to ensure that the system of staff appraisal extends to an assessment of performance and behaviours beyond the academic, and that any concerns are raised robustly and appropriately - formal and informal	Pupil feedback on tutors and teachers, including safeguarding/welfare questions, has been built into compulsory evidence base for SPS & CC appraisals. SPS appraisal process has been reviewed and reformed & EC received a progress report in February 2015.	-  CC appraisal process; an amended system will be introduced from September 2015.	Ongoing annual process  September 2015	BAU  WIP
3.c	G	GB to satisfy themselves that School Inspections are robust.	High Master has raised generic issues about inspection methodology with HMC and will meet with ISI to discuss.	High Master will report outcomes to BWG.	Ongoing work-stream	WIP
3.d	A	GB to ensure that the revised safeguarding audit is used annually and named governors are established to lead on the assessment, implementation and effectiveness of other specific prioritised policies, in particular the anti-bullying policy.	First full Annual Safeguarding Audit using new template presented to GB February 2015. Audit format to be reviewed annually to ensure it remains fit for purpose (with input from 3a & 3b where appropriate). Audit to include DBS compliance and evidence from sample incident reports.	Audit format to be reviewed annually to ensure it remains fit for purpose.  NRC to identify responsibilities and appoint GB members for 2015-16. Safeguarding roles of CPG and Chair to be included in Safeguarding policies.	Ongoing annual process  June 2015	BAU
3.e	A	GB to review the curriculum for teaching children how to keep themselves safe, as defined in KCSIE, determine its effectiveness and how that will be evidenced.	The Badman Review Team have confirmed existing curriculum is exemplary (p.9). SPS and CC SMTs have focussed on means of determining and evidencing effectiveness; and made recommendations to GB. Presentation on safeguarding curriculum at CC to CCC (March 2015). CC trialling self-assessment in PSHE scheme to provide evidence of pupils' learning about keeping safe (February 15). Presentation on safeguarding curriculum at SPS to EC (May 2015).	Any recommended curriculum changes to be implemented for academic year 2015/16.	Sept 2015	WIP
3.f	A/G	GB to review E-safety and ICT policies	Chief Operating Officer (COO) appointed line manager	-	-	BAU

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		and procedures on a regular basis to ensure they are up to date, effective and embedded in the culture of the organisation. Furthermore that any key issues are communicated and accessible to both parents and students.	<p>of ICT staff in September 2014; E-safety Governor appointed December 2014.</p> <p>E-Safety page for SPS parents updated. Programme of RAP (Raising Awareness and Prevention) Project seminars for parents and boys (February 2015 and June 2015) covering PSCE issues including e-safety. Associated INSET for staff (February 2015). Bulletins on e-safety provided to CC parents in the Grapevine (May 2015 and ongoing).</p> <p>Central system for recording e-safety incidents established by the SPS &amp; CC e-safety Officers (February 2015). First new-style routine E-Safety report for whole school received by SMT and H&amp;S Committee (May 2015). E-safety standing item on Health &amp; Safety Committee agenda.</p>	<p>E-safety sessions for CC 5<sup>th</sup> year boys at the start of each academic year from September 2015.</p> <p>RAP Project seminar programme to be repeated in 2015/16 with wider remit to include younger pupils and their parents.</p> <p>-</p>	<p>September 2015, and then ongoing process.</p> <p>Ongoing process</p> <p>Ongoing process.</p>	
3.g	G	GB to be confident that senior managers are consistent in exploring with colleagues the impact and relevance of child protection training.	<p>All training is fully recorded on the Single Central Register; self-assessment of training built into revised SPS and CC appraisal systems.</p> <p>All-staff meetings are used to provide updates and training reminders.</p>	GB receives a report on child protection and safeguarding training at each meeting.	Ongoing process.	BAU
3.h	A	GB to satisfy itself that the review of portering is completed, and that the recommendations for site security have been addressed.	<p>CCTV and portering review and actions completed (March 2015). New staffing structure implemented and appointments made (May 2015).</p> <p>CCTV and Safety Review report to Health and Safety Committee (May 2015).</p>	-	-	BAU
3.i	R	GB to determine a process whereby they receive more detailed management information concerning	Proposal for new process approved by GB in February 2015, and now live.	First report to GB for SPS and CC proposed for June 2015. Published complaint statistics to include reporting	June 2015, and then ongoing	BAU

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		complaints.		criteria.	process.	
3.j	R	GB to ensure the minutes of meetings are transparent and record more fully the evidence for decisions made.	GB minutes have been prepared to fully comply with this recommendation since mid-2014. This practice will continue.	-	On-going process.	BAU
3.k	A	GB to assure themselves that in the light of the report that an appropriate focus is maintained on the academic and pastoral needs of pupils (NSPCC).	This requirement is the sole objective of the CCC and EC. On-going monitoring will continue through EC, CCC and GB meetings.	-	On-going process	BAU