

Advice Note for a Progress Monitoring Visit

School name	Ampleforth College			
DfE number	815/6006			
Registered charity number	1063808			
Address	Ampleforth College Ampleforth York North Yorkshire YO62 4ER			
Acting Headteacher	Miss Deirdre Rowe			
Chair of governors	Mrs Claire Smith			
Number of pupils on roll	539			
	Boys	329	Girls	210
	Day pupils	100	Boarders	439
	Seniors	295	Sixth Form	244
Date of visit	22-23 May 2019			

1. Introduction

Characteristics of the school

- 1.1 Ampleforth College is a Roman Catholic co-educational boarding and day school situated in Ampleforth, North Yorkshire, adjacent to the Benedictine Ampleforth Abbey. The school, together with its preparatory school, St Martins, located three miles away, is administered by the St Laurence Education Trust (SLET). It educates pupils from the ages 13 to 19 years, most of whom board in one of nine boarding houses. One pupil has an education, health and care (EHC) plan. There are 163 pupils who have been identified as having special educational needs and/or disabilities, of whom 20 receive specialist additional help. English is an additional language for 152 pupils of whom 85 receive support for their English.
- 1.2 The previous ISI regulatory compliance inspection was in March 2018 and a progress monitoring inspection took place in November 2018.

Purpose of the visit

- 1.3 This was an unannounced progress monitoring visit at the request of the Department for Education (DfE) to check the progress that has been made following the monitoring inspection November 2018, which related to an action plan submitted in June 2018. Areas of previous non-compliance where standards are still not met are indicated by a judgement of 'Remain not met'.
- 1.4 This visit also incorporated additional elements at the request of the Department for Education (DfE) regarding recent concerns which focused on the school's compliance with the Education (Independent School Standards) Regulations 2014 (ISSRs), the National Minimum Standards for Boarding 2015. Standards newly found to be non-compliant are indicated by a judgement of 'Not met'.

Regulations which were the focus of the visit	Team judgements
ISSR Part 1, paragraph 2 (d)(i and ii) (curriculum)	Met
ISSR Part 3, paragraphs 7, 8; NMS 11 (safeguarding)	Remain not met
ISSR Part 3, paragraph 9; NMS 12 (behaviour)	Not met
ISSR Part 3, paragraph 10; NMS 12 (bullying)	Not met
ISSR Part 3, paragraph 14; NMS 15.5 and 15.6 (supervision of pupils)	Met
ISSR Part 3, paragraphs 11 and 16; NMS 6.3 (risk assessment)	Met
ISSR Part 7, paragraph 33; NMS 18 (complaints)	Not met
ISSR Part 8, paragraph 34; NMS 13 (leadership and management)	Remain not met

2. Inspection findings

Quality of education provided – curriculum [ISSR Part 1, paragraph 2 (d)(i and ii) (curriculum)]

- 2.1 The school meets the standard.
- 2.2 The school has a suitable policy and programme of study for the promotion of personal, social and health education (PSHE) which emphasises Christian living, attitudes and behaviours. The programme is updated each year and is supplemented by further talks and outside speakers on concerns which are raised in school or are topical in modern society. The programme is taught in age-specific groups by teachers who have suitable written materials to support the delivery of the curriculum.
- 2.3 Lessons on preventing bullying are given to pupils in all age groups, covering topics such as power and control, bullying on and off-line, positive relationships, keeping each other safe, recognising abuse and awareness of social situations, toxic relationships and respect in the workplace. Additional lessons have been given to pupils on peer-on-peer abuse, coercion, ‘hazing’ and online safety within recent months, especially relating to life in boarding houses.
- 2.4 The health education aspect of PSHE covers the study of the impact of alcohol and drugs, with visiting speakers invited into school to explore the implications of this abuse.

Welfare, health and safety of pupils – safeguarding [ISSR Part 3, paragraphs 7 and 8; NMS 11]

Safeguarding policy

- 2.5 The school meets the requirements.
- 2.6 The school has an appropriate policy for safeguarding which provides suitable arrangements to safeguard and promote the welfare of pupils at the school.

Safeguarding implementation

- 2.7 The school does not meet the standards.
- 2.8 After the previous visit the school was required to remedy deficiencies with regard to the following action point:
- Ensure the welfare and safety of boarders by improving the implementation of safeguarding procedures, particularly those relating to the supervision of vulnerable pupils [paragraphs 7 (a) and (b), 8 (a) and (b); NMS 11]
- 2.9 This action point has not been met. The school still does not implement the safeguarding policy effectively. It does not identify the different responses required for behavioural concerns and safeguarding concerns, particularly with reference to bullying and peer-on-peer abuse and the potential danger stemming from the misuse of internet messaging. In addition, the school did not have regard to the guidance in *Keeping Children Safe in Education 2016* (KCSIE) when it failed to include safeguarding concerns in a reference it provided for a member of staff.
- 2.10 The designated safeguarding lead (DSL), designated deputies and members of school leadership have received suitable up-to-date training. The system used to record concerns is effective and has improved oversight of safeguarding by senior staff. The management structure for handling safeguarding concerns is known to staff. Pupils understand who to go to with a concern or where to seek support. The staff have regular training and updates regarding safeguarding and understand the staff code of conduct and how to use the whistleblowing procedure. There is an improved culture of the recognition of the importance of safeguarding throughout the school, and it is given a high profile with staff, pupils and parents.

- 2.11 Members of the senior leadership team, however, fail to follow their training and make judgements that are contrary to the school safeguarding policy and procedures. Incidents involving the physical abuse of pupils are not always recognised as a potential bullying or safeguarding concerns, and at times have been recorded only as poor behaviour. In addition, appropriate referrals to the police or to the local safeguarding authorities are not always made in a timely manner. An external investigation and report has been commissioned by the Interim Safeguarding Manager with agreement from the trustees. The school's own investigation and a subsequent external investigation confirmed that such abuse had taken place and the senior leadership recognise mistakes in how this had been handled. In addition, a further serious safeguarding issue arose in December 2018. On this occasion, the school's leadership took advice from the Interim Director of Safeguarding who advised immediate referral to the police and North Yorkshire Safeguarding Children Board (NYSCB). This advice was not followed and it was not referred to the police until 3 January 2019 and even later to the NYSCB. The leaders involved made a judgement that they considered to be in the best interests of the child but, in doing so, failed to follow the school safeguarding procedures or the advice given by the Interim Director of Safeguarding and therefore put a child at risk.
- 2.12 A reference was provided for a member of staff by the school. The reference failed to supply details of a formal warning given for safeguarding reasons. This is contrary to the guidance in KCSIE 2016, which states that due regard must be given to the need to identify people who may pose a risk of harm to children. An issue relating to references was also identified during a previous inspection visit in March 2018. A review of the policy for the provision of references has been completed and an audit of all references issued in the last three years has now been undertaken.
- 2.13 A culture of bullying was alleged in one of the college boarding houses. Pupils interviewed reported feeling happy and comfortable in school and did not report any incidents of bullying to the inspection team. They had a sound knowledge of what to do if they became aware of a pupil who needed help and who they would report to. The log of bullying incidents showed a number of open cases currently being monitored, ranging from low-level name calling to more serious incidents. One house has notably more cases documented than others. An action plan to monitor this house has been prepared by the Director of Safeguarding, but had not been fully implemented at the time of the inspection visit. This action plan includes actions to assess the culture in this house, and others, through anonymous surveys and sample interviews with pupils. The plan incorporates further training for house staff, improved communication and record keeping and a review of practice.
- 2.14 The senior pastoral team meet weekly and reports from boarding houses are reviewed. Any incidents or concerns are discussed and actions are outlined and reviewed for progress. The inspection found monitoring of behaviour, bullying and potential safeguarding concerns to be robust at the time of the inspection. Extra training and support had been supplied to house staff since the incidents in the autumn term.

Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 12]

- 2.15 The school does not meet the standards.
- 2.16 The school has an appropriate behaviour policy, dated December 2018, which outlines the code of conduct for pupils and sanctions that apply if there is a breach of this conduct. Sanctions are graded, with the most serious being permanent expulsion. The sanctions log shows that the sanctions most commonly applied are temporary exclusions, either internal or external, mostly for three days. The senior leadership confirmed to the inspection team that, on reflection, sanctions applied as a result of serious incidents, such peer-on-peer abuse, can be overly lenient.
- 2.17 The policy also states about expulsion: *'A student may be formally expelled from the School if it is proved on the balance of probabilities that the student has committed a grave breach of school*

discipline or a serious criminal offence. Expulsion is reserved for the most serious breaches. Inspectors judged incidents such as peer-on-peer abuse, particularly in cases which had been admitted by the perpetrators, are not always considered as a serious breach of school discipline and a potential criminal offence. There is evidence that permanent exclusion is not always considered as a sanction in such cases.

- 2.18 The behaviour policy states *'The School's policy and procedures with regard to peer-on-peer abuse are set out in the School's Child Protection and Safeguarding policy and procedures. If behaviour and discipline matters give rise to a safeguarding concern, the procedures in the Child Protection and Safeguarding policy and procedures will be followed.'* Serious incidents of peer-on-peer abuse are not always treated according to the safeguarding policy or the required procedures followed.
- 2.19 School leaders are clear that sanctions are discretionary and pupil circumstances are taken into account when making decisions. However, although the circumstances of the perpetrator are considered, the welfare of the victim is not always prioritised. The behaviour policy states that a pupil may be temporarily excluded for up to 14 days whilst an investigation takes place. There is no evidence that this part of the policy was considered. Inspectors concluded that the behaviour policy was not always followed for peer-on-peer abuse incidents, the findings of investigations are not always followed through and sanctions may not be applied appropriately.
- 2.20 Other concerns raised regarding the behaviour of pupils include incidents of alcohol and drug abuse. There are suitable policies in place, appropriate for the school. The behaviour log shows 34 cases of alcohol abuse in the current academic year. Evidence shows that most of these incidents involved pupils bringing alcohol into the school to consume in boarding houses. The school sixth-form bar is closely monitored and controlled with a strict code of conduct and suitable risk assessments are in place and few offences were attributed to the consumption of alcohol on these premises. The school makes frequent searches of pupils' rooms for alcohol, drugs and cigarettes and sanctions have been suitably applied.
- 2.21 In May 2019, a concern was reported to NYSCB regarding pupils running on the school site under the influence of alcohol. The concern included whether there had been coercion or pressure to remove clothing, whether photographs were taken and whether younger pupils may have been involved. The incident was discussed by the school with NYSCB and investigated fully by the school. The investigation found that a group of male pupils who were all sixth formers drank beer and then ran around the grounds naked, reviving a former school tradition. No evidence of coercion was found and no phones or cameras had been allowed by the pupils involved. It was not discovered how alcohol had been brought on to the site. With the support of advice from NYSCB, the matter was dealt with appropriately by the school senior leadership as a disciplinary matter, rather than safeguarding and suitable sanctions were applied.
- 2.22 There are three cases of incidents involving drugs in the bullying log in March 2019 and October 2018 which remain open and under investigation. The other common behavioural issue in the college is smoking or 'vaping'. This is also appropriately monitored.
- 2.23 Suitable risk assessments are in place to protect vulnerable pupils and for premises that may be at risk.

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

- 2.24 The school does not meet the standards.
- 2.25 The school has a suitable anti-bullying policy, dated June 2018, which has regard to statutory and non-statutory guidance. Peer-on-peer abuse is also included in the policy. However, incidents of peer-on-peer abuse are not always recorded as bullying incidents but as behavioural concerns and therefore

procedures are not always followed. Incidents are reported as a behavioural concern instead. The school has put further training in each house for pupils on reporting incidents. The bullying log shows several cases of bullying recorded since December 2018, mostly for unkindness, teasing, intimidation of younger boys by older boys and fighting. Evidence from minutes of pastoral team meetings indicates that those pupils concerned are being monitored closely and suitably supported and the inspection found that most have been dealt with according to college procedures.

Welfare, health and safety of pupils – supervision of pupils [Part 3, paragraph 14; NMS 15.5 and 15.6 (supervision of pupils)]

2.26 The school meets the standards.

2.27 After the previous visit the school was required to remedy deficiencies with regard to the following action point:

- Ensure that procedures for knowing the whereabouts of boarders are stringently followed [paragraph 14; NMS 15.5 and 15.6]

2.28 This action point has been met. The leadership and management have ensured that a register is taken frequently throughout the day to ensure that no pupil is missing from the premises. Arrangements to check that all pupils are in the boarding house at night and at bedtime have been improved and all evening checks are now undertaken by adults. The ‘missing child’ policy is appropriate for the school and was demonstrated to work effectively in a recent incident of a child leaving the school grounds in an effort to go home. The houses have suitable duty rotas in place and staff are aware of their responsibilities regarding supervision.

Welfare, health and safety of pupils – risk assessment [ISSR Part 3, paragraph 16; NMS 6]

2.29 The school meets the standards.

2.30 There is a strategic approach to risk assessment which includes risk assessments for vulnerable pupils. Pupils about whom concerns have been raised and who remain in school are risk assessed by the housemasters/mistresses, and the infirmary staff, all of whom have been trained in risk assessment. Some pupils have care plans in place. All information is available to staff and individual pupils are discussed weekly for progress reports.

2.31 At the time of the inspection, there had been no decision about whether monks who have been investigated on account of safeguarding concerns will be allowed to return to Ampleforth Abbey. It was planned for the new DSL for the Abbey to be in touch with the local authorities to discuss any proposed reintegration plan.

Manner in which complaints are handled [ISSR Part 7, paragraph 33; NMS 18]

2.32 The school does not meet all of the standards.

2.33 The school has a suitable complaints policy which is available to parents and sets out clear timelines for the handling of formal complaints.

2.34 However, the school does not always follow the procedures outlined in its complaint policy. A formal complaint was made in December 2018. The school failed to advise the parent that it would follow the complaints procedure or respond to the complaint within the time frames set by the policy. A meeting was held with the parents in January, after which the Interim Safeguarding Manager became involved.

2.35 Satisfactory correspondence with the parent is not evident until February. This was beyond the 20 working days response time defined by the policy. At no time was the parent’s attention directed to

the college's complaints policy and procedures or their right to request a panel meeting with trustees. No panel meeting was offered by the school. The Interim Safeguarding Manager handled the incident as a safeguarding concern and was not responsible for the management of it as a school complaint. The trustees did not become involved as they presumed it was being handled by the Interim Safeguarding Manager. As a result of a lack of clarity about who was handling the complaint, the communication with the parent failed. The information requested by the parent was not formally made available until early May 2019. This complaint has required an investigation which has also slowed procedures but there has been a lack of urgency to handle it as a complaint.

2.36 The complaint continues to be unresolved, and relates to the school's boarding provision.

Quality of leadership and management [ISSR Part 8, paragraph 34; NMS 13]

2.37 The school does not meet all of the standards.

2.38 After the previous visit the school was required to remedy deficiencies with regards to the following action point.

- Finalise and embed the new arrangements for the governance of the school, in particular those aspects relating to the management of safeguarding (paragraph 34 (1)(b) and (c); NMS 13.1)

2.39 This action point has been met. Progress has been made by the trustees since the previous inspection. A framework agreement for the separation of the governance of St Lawrence Education Trust (Ampleforth and St Martin's schools) (SLET) from that of Ampleforth Abbey Trust (Ampleforth Abbey) (AAT) was signed by both trusts in October 2018 setting out the key proposed responsibilities of each trust under a new separate structure. Terms of reference for this agreement and its associated committees have been clarified and agreed.

2.40 Changes have been made to increase the robustness and resilience of the structures and management in relation to safeguarding. The working party which was formed to review and implement the changes to governance continues its work and has agreed a governance structure which is likely to ensure a rigorous approach to the design and implementation of safeguarding arrangements. The Ampleforth Safeguarding Charter now in operation explains the safeguarding standards that need to be upheld and demonstrates a commitment to keeping all children safe across the Ampleforth site, including St Martin's.

2.41 The Director of Safeguarding and a full-time monastery Safeguarding Co-ordinator have been appointed and have executive responsibility for safeguarding across the whole site. The Interim Safeguarding Manager continues to work with both boards and the executive. A formal Safeguarding Committee reporting jointly to both boards has been constituted. This holistic approach is supported by the Charity Commission. A new Safeguarding Commission is being reconstituted to ensure effective multi-agency involvement of all matters relating to the management of monastic safeguarding and will report to the Safeguarding Committee on any such matters which may impact on the school. The Director of Safeguarding is currently developing a structured approach to the consideration of the well-being of those affected by abuse.

2.42 The recruitment of new SLET trustees with appropriate skills and experience is underway with some success. The board of SLET has nominated one of its number as an interim safeguarding lead pending appointment of a trustee with safeguarding experience. The Interim Safeguarding Lead currently works alongside the Interim Safeguarding Manager and it is intended that they will assume lead responsibility for safeguarding matters following the discharge of the Interim Safeguarding Manager. The trustees continue to seek recruitment of further trustees who have experience of safeguarding to make a permanent appointment to this position. Two trustees on the board are coming to the end of their terms of office, which will make way for new appointees.

- 2.43 A safeguarding log is maintained by the Director of Safeguarding of any incident directly or indirectly related to safeguarding. This log is sent regularly to the Chair of Trustees of SLET and is presented to trustees at each meeting to maintain suitable oversight and to ensure that safeguarding is being managed effectively. Minutes of trustee meetings show that all safeguarding concerns are discussed and monitored.
- 2.44 The Director of Safeguarding, the Interim Safeguarding Manager and the trustees have ensured that within the senior management of the College and St Martin's a clear structure for referral has been established showing the designated safeguarding leads (DSLs) and deputy safeguarding leads (DDSLs). The current DSL for the College is a new appointment, currently in an acting position, and will take up this permanent full-time position in the new academic year. He has been the Interim Director of Safeguarding working across the College, St Martin's and the Abbey and is experienced in all aspects of safeguarding at the College. He is fully trained as a DSL. The inspection found a clarity in referral lines which was demonstrated by all interviews undertaken with staff.
- 2.45 After the previous visit the school was required to remedy deficiencies with regard to a further action point.
- Promote the well-being of pupils by ensuring that action is taken immediately to address identified shortcomings in the implementation of safeguarding procedures (paragraph 34 (1)(b) and (c); NMS 13.4 and 13.5)
- 2.46 This action point has not been met. Members of the senior leadership team within the college do not demonstrate good skills and knowledge and have not always fulfilled their responsibilities effectively since the previous inspection in November 2018, and thus do not consistently promote the well-being of pupils. They have failed to identify and refer some safeguarding incidents to the local safeguarding board in a timely manner and to ensure there is due regard for the guidance of KCSIE. As a result, safeguarding practice has not always been secure, including issues surrounding peer-on-peer abuse, bullying, pupil behaviour and online safety.
- 2.47 The guidance in KCSIE 2016 has not been followed with regard to the issuing of a suitable reference for a member of staff who potentially may represent a risk to pupils.
- 2.48 In addition to the above failings leadership and management have not ensured that the school complaints procedure is formally applied in a consistent manner.

3. Regulatory action points

- 3.1 The school does not meet all of the requirements of the Education (Independent School Standards) Regulations 2014, National Minimum Standards for Boarding Schools 2015 and should take immediate action to remedy deficiencies as detailed below.

ISSR Part 3, Welfare, health and safety – safeguarding [ISSR Part 3, paragraphs 7 and 8; NMS 11]

- Ensure that all safeguarding incidents are referred to the local safeguarding authorities and the police, if applicable, in a timely manner [paragraphs 7 (a) and (b); 8 (a) and (b); NMS 11].
- Ensure that all references for staff leaving the employment of the college outline any potential risks to children [paragraphs 7 (a) and (b); 8 (a) and (b); NMS 11].

Welfare, health and safety of pupils – behaviour [ISSR Part 3, paragraph 9; NMS 12]

- Ensure that the behaviour policy is correctly implemented so that behaviour which represents a risk to pupil welfare is treated as a safeguarding matter [paragraph 9; NMS 12].
- Ensure that sanctions defined in the behaviour policy are appropriately applied to ensure pupil welfare [paragraph 9; NMS 12].

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

- Ensure that bullying behaviour is correctly identified, particularly with regard to peer-on-peer abuse, and handled according to the anti-bullying and safeguarding policies [paragraph 10; NMS 12].

Handling of complaints [ISSR Part 7, paragraph 33; NMS 18]

- Ensure that complaints are handled within the time frames of the complaints policy or reasons are satisfactorily supplied for any delay which is necessary [paragraph 33 (c)].
- Ensure that any matter about which a parent of a pupil is unhappy and seeks action by the school is treated as a complaint and that parents are given advice on how to activate the complaints procedure [paragraph 33 (e) and (f); NMS 18].

Quality of leadership and management [ISSR Part 8, paragraph 34; NMS 13]

- Ensure that leadership and management fulfill their responsibilities for safeguarding pupils according to the safeguarding policy in all matters of referrals to the local safeguarding authorities [paragraph 34 (1)(a), (b) and (c); NMS 13.1, 13.3 – 13.5].
- Ensure that leadership and management have a thorough understanding of peer-on-peer abuse according to KCSIE 2018 [paragraph 34 (1)(a), (b) and (c); NMS 13.1, 13.3 – 13.5].
- Ensure that all members of leadership and management have the knowledge and skills needed to promote the welfare of pupils with regard to peer-on-peer abuse, bullying, pupil behavior and e-safety [paragraph 34 (1)(a), (b) and (c); NMS 13.1, 13.3 – 13.5].
- Ensure that the ISSRs and NMS are fully understood and implemented effectively and consistently so as to promote the well-being of pupils, including boarders [paragraph 34 (1)(a), (b) and (c); NMS 13.1, 13.3 – 13.5].

4. Summary of evidence

Written materials

- Safeguarding policy
- Records of staff safeguarding training
- Missing children policy
- Drugs and alcohol policy
- Code of conduct for staff, Whistleblowing policy and records of staff training in both
- Anti-bullying policy and procedures/evidence of staff and pupil training in anti-bullying
- Evidence of pupil education in bullying, behaviour, alcohol and drugs (PSHE)
- Behaviour policy and sanctions
- Records of serious behaviour incidents/records of sanctions
- Records of bullying incidents and actions taken
- E-safety policy for staff and pupils
- Policy for staff references
- Health and safety documentation regarding supervision in boarding houses, risk assessment and school pub
- Risk assessments for school pub and for vulnerable pupils
- Trustees' minutes since November 2018/review of safeguarding policy/review of serious incidents/ bullying policy review/sanctions policy/ complaints
- Minutes of senior leadership meetings and house staff meetings
- Complaints policy and procedures/complaints log

Meetings with school personnel

- The Acting Head (progress since the previous inspection, safeguarding, supervision, leadership and management).
- The new College DSL and previous DSL (safeguarding procedures).
- Head of Boarding (supervision of boarders, behaviour management in boarding houses).
- Senior staff member responsible for behaviour management (behaviour and bullying, discipline and sanctions, alcohol policy and concerns, policy and procedures for the school pub, drug policy and procedures, behaviour logs and documentation).
- Selected housemasters/mistresses (safeguarding, missing child policy and procedures, behaviour management and bullying, supervision in houses, alcohol policy and procedures, drugs policy and procedures).
- Senior staff member responsible for PSHE (education in bullying, responsible behaviour, use of alcohol and drugs).
- Interim Safeguarding Coordinator (safeguarding progress since the previous inspection).

- Director of Safeguarding (safeguarding management).
- House matrons (care of boarders in houses).
- Telephone call with the designated governor for safeguarding.
- Chair of trustees (progress since the previous inspection, safeguarding concerns, complaints).
- Pupil interviews with a group of Year 9 and Year 12 pupils (behaviour, bullying and supervision in houses).
- Selection of boarding staff (behaviour in houses).
- Health and Safety officer (selected risk assessment).
- Interview Head of HR re: policy for references.
- Director of Governance (Governance, leadership and management).
- Feedback to selection of trustees and senior staff.

Activities on site

- Pupil interviews with a group of Year 9 and Year 12 pupils (behaviour, bullying and supervision in houses).
- Inspection of admissions register (pupils leaving the school mid-term).