



Moon Hall

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Dear Parents

I am sending with this letter a copy of the Report from the Independent Schools Inspectorate which we received at the end of last week. It is a report on an inspection carried out on 4th October 2016 relating to the school's safeguarding policies and procedures.

I would like to emphasise that the inspection found no fault in the manner in which the staff and leadership were safeguarding the pupils in practice. With respect to what is actually happening at the school with the children, the report is complementary.

We have, however, failed the compliance tests in relation to the safeguarding policy document, its implementation and the leadership and management needed to prevent these failures.

Parents are entitled to an explanation which I am seeking to provide in this letter. We have to accept that regulatory compliance is obligatory and that we have to meet the regulations however onerous they may be.

I apologise if my explanations appear unduly lengthy but I believe it is important for an understanding of the position.

Safeguarding policy document

I believe our safeguarding policy document was compliant until 31st August 2016 but became non-compliant on 1st September 2016 (or a few days later when the Department of Education published Keeping Children Safe in Education (KCSIE) September 2016 edition).

Our safeguarding policy had been written in September 2015 to reflect the provisions of KCSIE July 2015 edition (which in turn replaced the March 2015 edition). Our policy was marked for review in June 2016 but was not reviewed then because it was known that significant amendments to KCSIE were due to be published in September and a draft was already in circulation.

The following specific failings in our policy were noted:

The policy lacks appropriate contact details, particularly to reflect the change of Head.

The contact details were well known within the school. This is covered in the new policy which is now on our website.

The policy lacked clarity in the handling of allegations against staff in terms of the reporting channels [and had] an implication that the school might investigate before making any referrals.

The policy contained the following relevant statements:

"If at any time we consider that the child may be defined as a child In need (Children Act 1989) or that the child has suffered significant harm or there is a risk of immediate serious harm, we will immediately refer to children's social care services."

This is the overriding statement.

Then in relation to allegations against staff the policy states:

"The Principal/Head must be informed immediately if an allegation is made, or information is received which suggests that a member of staff has:

Behaved in a way that has or may have harmed a child

Possibly committed a criminal offence against or related to a child

Behaved towards a child in a way that indicates he or she would pose a risk of harm to children.”

“Procedures dealing with allegations against members of staff need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children’s social care services. In these cases local arrangements should be followed to resolve cases without delay.”

“Some rare allegations will be so serious they may require immediate intervention by the children’s social care services and/or police. The DSL [Designated Safeguarding Lead] should be informed of all allegations that come to the School’s attention and appear to meet the criteria. The police and children’s social care services can be consulted as appropriate.”

The wording above was copied direct from KCSIE July 2015. Our new policy deals with the matter differently.

The policy lacks clarity by inferring that parental consent would be sought before making any referrals.

The policy contains the overriding statement mentioned above. In addition it states:

“Following a report of concerns from a member of staff, the DSL must:

- *Decide whether or not there are sufficient grounds for suspecting significant harm.*
- *If there are grounds for concerns they must contact SCCCT and make a clear statement of:*
 - *The known facts*
 - *Any suspicions or allegations*
 - *Whether or not there has been any contact with the child’s family*
- *If the DSL feels unsure about what the child has said they can phone to discuss concerns on an anonymous basis....*
- *Where there are doubts or reservations about involving a child’s family, the DSL should clarify with the SCCCT or police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation.*
- *However, if there are no such valid doubts or reservations, the parents must be notified and their consent to the referral sought. There is requirement to report this on the referral form. A failure to discuss and work with the parents without good reason is likely to be seen by them as a breach of the relationship of trust that exists between the parents and the school and could be seriously prejudicial to the child,*
- *Where appropriate, the DSL should help the parents understand that the referral is in the interests of the child and that the school will be involved in the enquiry or policy investigation, as per the Children Act 1989.”*

The policy lacks appropriate coverage of peer abuse

This is a fair criticism but in practice the school has been doing a lot of work in respect of the risk of peer abuse. It is covered in the new policy.

The policy lacks appropriate coverage of the vulnerability of pupils with SEND [special educational needs and disabilities]

It is a criticism but all our pupils have special educational needs.

The policy lacks coverage of teaching pupils how to keep themselves safe, including on line safety issues such as cyber-bullying and ‘sexting’.

There is a separate E-safety policy which covers this. A lot of work has been and is being put into these topics.

Policy implementation

The report acknowledges that in fact the policy, including KCSIE September 2016, is being implemented. All staff received the key sections of KCSIE September 2016 and know what to do. There was a reservation about staff training. In the past, staff have received their safeguarding training during the INSET days at the beginning of the academic year (and new joiners when they arrive). This year, because of the late publication of the final version of KCSIE, staff were instructed to complete on line training for which the school has paid. In house training is also required and this has been scheduled for staff at both schools in January.

Leadership and Management

ISI were not happy that the safeguarding and recruitment policies had not been updated as part of the handover period with the new Head, that the full Governing body had not been systematically reviewing and monitoring the policy content or implementation and that the restructuring of the Governors' sub-committees had not been completed.

We recognise there is more to do in this area. In October 2015 the full Board reviewed the safeguarding policy against KCSIE July 2015 together with a Whistleblowing policy and other policies. In March 2016 the full board reviewed a new staff recruitment policy.

Reason for the inspection

You will see that the inspection report is described as an emergency visit report. The reason for the visit was not disclosed but I spent over an hour with the two inspectors and at the end of my meeting with them they appeared fully satisfied that no child has been at risk of harm at the school. This seems to be reflected in the report's conclusion that despite the shortcomings identified in their report, staff and school leaders have the well-being of pupils as a high priority.

Finally

The safeguarding of your children in our care is an absolute essential at all times. Because of the kind of school we are the whole of your children's pastoral care is very important to us and to how we are able to help them. The regulatory regime is a one size fits all set of obligations that applies to all schools whatever their size and resources. I hope in this letter I have been able to reassure you that our failings in this inspection related to the documentation and to some extent the governance structures that the regulators expect to see and not to the actual care and protection of your children's well-being.

We will be very happy to meet with any parent who still feels concerned about the report.

Yours sincerely



David Baker
Chairman of Governors
Moon Hall Schools Educational Trust