

CHAPTER 3 STANDARDS

INTRODUCTION

- 1 This chapter covers the following subjects:
 - a. management,
 - b. child protection,
 - c. school staff,
 - d. standards of accommodation,
 - e. health,
 - f. safety,
 - g. contact with parents and others,
 - h. religious and cultural ethos,
 - i. personal relations and discipline,
 - j. restriction of liberty, and
 - k. complaints procedures.

MANAGEMENT

Statement of principles

- 2 The school should have a statement of the principles which provide the foundation for school life. It should be available to parents, pupils, staff and where relevant, the authorities which place children in the school. It should cover matters such as:
 - a. the way care is provided,
 - b. discipline, and
 - c. the professional skills of the staff.
- 3 The information should be presented in such a way that pupils are aware of what is expected of them and how the arrangements for their care are intended to work, and that staff understand the principles and procedures which will enable the child to feel secure.

Record keeping

- 4 Systems are required to ensure that relevant information about the welfare and development of individual children is recorded clearly and in sufficient detail to inform decisions about the child's care, and to serve as a record of action taken by staff.
- 5 In the course of inspections the Department of Health and Social Security will enquire where information on the welfare of children is recorded. Some or all of the records will be examined in detail.

See chapter 4 below

- 6 Inspectors from the Department of Health and Social Security will not normally concern themselves with the detail of educational records. It will, however, be helpful for schools to show the inspectors the complete individual record system.

CHILD PROTECTION

- 7 Guidance on the action to be taken on cases of suspected or identified child abuse within a school is set out in detail in the Isle of Man Child Protection Committee agency procedures which apply to all agencies responsible for the welfare of children.
- 8 The nominated member of staff should ensure that those people who have responsibility for pupils at the school are aware of the Isle of Man Child Protection Committee agency procedures
- 9 Staff should be aware that pupils may suffer abuse or neglect of the following forms:
- a. physical,
 - b. sexual, or
 - c. emotional.
- 10 Abuse may occur either:
- a. whilst at home or away from the school, or
 - b. within the school itself.

Abuse may be inflicted by staff, other adults including parents, or other children.

- 11 Staff should be aware of behavioural and physical indications of the possibility of abuse. School medical and nursing staff in particular should have appropriate training and access to advice on child protection.
- 12 In order to secure, as far as possible, the welfare of pupils all schools should have clearly stated procedures for dealing with allegations of abuse in order to secure as far as possible the welfare of pupils. These should reflect the procedures set out in the Isle of Man Child Protection Committee agency procedures

Child protection procedures in independent schools

- 13 The investigation of possible abuse is a matter for the Department of Health and Social Security, which should be informed immediately, following the Isle of Man Child Protection Committee agency procedures

Good practice in child protection

	<p>14 Good child protection practice in all independent schools should provide for:</p> <ul style="list-style-type: none"> a. a named senior member of staff with responsibility for child protection and welfare issues within the school, and for liaison with the Department of Health and Social Security, b. a detailed note to be made when abuse is alleged, and c. the Department to be informed at once. <p>It is for the Department and the police to interview or to take any necessary statements from those involved, including the child.</p> <ul style="list-style-type: none"> d. appropriate arrangements to be made with the Department for counselling the child, and e. for the parents and/or the placing authority (where appropriate) to be informed. Informing parents is normally a matter for inter-agency agreement. <p>The responsibility lies in the area where the child is at the time when the abuse or need for protection is discovered or alleged.</p> <p>Complaints of abuse should be independently investigated in accordance with the Isle of Man Child Protection Committee agency procedures</p> <ul style="list-style-type: none"> f. the police should be involved if necessary, g. the matter must be reported by the school to the Department of Education without delay, in accordance with Isle of Man Child Protection Committee agency procedures <p>15 The Department of Health and Social Security and the Isle of Man Child Protection Committee will offer independent schools advice and support on child protection matters.</p> <p>16 The school should co-operate fully with investigations, so as to establish the truth of any allegation of abuse.</p> <p>Staff suspected of abuse</p> <p>17 If members of staff or others are under suspicion, the head will need to act in accordance with the wishes of the police and investigators from the Department to ensure that there is a proper investigation and that all pupils are fully protected.</p> <p>18 Staff may have to be suspended from duty and disciplinary proceedings instituted, including the possibility of dismissal, in addition to action taken by the police. Even if there is insufficient evidence for a prosecution, consideration should be given to the possible need for disciplinary proceedings against a staff member.</p> <p>19 Schools should also consider the need for counselling, by specialist practitioners, for pupils who have suffered abuse, and any others</p>
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closely involved. They should also have regard to the effect on the school as a whole.

- 20 If, in the course of their duties under the Education Act, the Department suspects that a child is suffering, or is likely to suffer significant harm, the Department will consider taking action under the Children and Young Persons Act 2001. This could mean:
- a. asking a court to issue an Assessment Order or an Emergency Protection Order to safeguard the child, and
 - b. making a report to the Department of Education under section 106A (4).

SCHOOL STAFF

Number of staff and staff/child ratios

- 21 The management of schools should ensure that sufficient staff are always on duty to ensure that:
- a. the children are safe, and
 - b. individual children have the opportunity to develop appropriate relationships with adults.
- 22 The number of staff required will depend on:
- a. the activities in hand,
 - b. the age of the children, and
 - c. any personal difficulties the children may have.
- 23 The ratio of pupils to staff with care responsibilities should be appropriate to the age of pupils and their needs.
- Both male and female staff should be involved in the care of the children.

Information, training, and supervision

- 24 Schools should have a written policy on the personal and social development of pupils and relevant principles and procedures. This should be available in a staff handbook or similar document. A copy should be provided to all staff when they are appointed.
- 25 Schools should ensure that new and inexperienced staff have a planned induction. This should include:
- a. an explanation of the principles which underlie practice, and
 - b. the school's procedures for caring for pupils.
- 26 To ensure that this guidance is applied properly, staff should be adequately supervised, with opportunities for consultation with senior and more experienced staff. This should help to ensure that staff are protected from being drawn into inappropriate behaviour, and from false accusations.

These arrangements apply as much to teaching staff as to staff with care responsibilities.

- 27 Regardless of professional training and experience, staff are likely to have training needs related to the care of children. Staff working with children with particular needs, are likely to require specialist training. Schools should ensure that the training needs of staff on care aspects are met.

All staff need to be aware of indications of child abuse, and the procedures for dealing with suspected and actual cases. Staff responsible for the children's care should receive special training.

Police and other checks and references

- 28 Proprietors are expected to carry out thorough checks on the suitability of staff prior to appointment. These cover:
- a. teaching and non-teaching staff,
 - b. full-time and part-time staff,
 - c. temporary work experience placements and
 - d. volunteers who will have substantial unsupervised access to children.
- 29 The Department of Health and Social Security inspectors will always examine school staff records carefully to ensure that adequate checking arrangements are in place. Where children are placed with landladies, similar checks will be carried out.
- References from past employers should be taken up.
- 30 Checks should be made with:
- a. the Department of Health and Social Security and of
 - b. criminal records
- 31 Candidates for both teaching and care posts should be required to produce proof of qualifications and to give a satisfactory explanation of any gaps in CVs.
- 32 DHSS Inspectors will enquire whether appropriate checks have been made.
- 33 Independent schools are strongly advised to fully check the background of prospective employees.
- 34 Requests for references should contain a specific enquiry about any indications that an individual is not suitable for employment in a situation involving the care of children living away from home, or substantial access to children.

STANDARDS OF ACCOMMODATION

- 39 The standard of accommodation in all school buildings used by pupils should enable them to live a full life in the school community. The living space and overall environment should be pleasant, comfortable, safe, and geared to children's needs.

Space for different purposes

- 40 The Department of Health and Social Security will have regard to the importance of personal space to young people's social well-being. Boarders need to be able to:
- a. personalise those areas which they can regard as their own, such as their study space and around their beds,
 - b. store their personal belongings in their own lockable cupboard or chest of drawers,
 - c. enjoy a degree of privacy, away from the rest of the school community, and from younger or older peers,
 - d. in mixed schools, spend time away from the opposite sex, and
 - e. have access to appropriate staff in private.
- 41 Children and young people also need common space where they can mix in larger groups and carry on a variety of more active or quieter pursuits

Accommodation details

- 42 The Department will follow good practice standards in judging the suitability of school accommodation, and look for as many as possible of the following items:
- a. Bedrooms:
 - i. separate accommodation for boys and girls, and for older and younger pupils,
 - ii. sufficient space, not crowded. Double bunks are acceptable only if this creates space that can be used constructively for comfort and for activity,
 - iii. access for boarders to their own bedroom at all times,
 - iv. sufficient ventilation and lighting in the bedrooms,
 - v. furnishings which are comfortable, beds well-sprung, with safety rails on upper bunks, sufficient storage and hanging space for clothes. Space to store towels, flannels and toothbrushes hygienically,
 - vi. a good standard of decoration, cleanliness and housekeeping which sets standards for boarders to emulate. Furniture should be in good condition and suit

the requirements of the room.

- a. Common rooms, social or living accommodation:
 - i. of sufficient number and size to meet the requirements of all boarders,
 - ii. enough space to separate boisterous and quiet activities, and older and younger boarders when they wish,
 - iii. where there are mixed houses, or female and male boarders living on campus, social accommodation should allow an appropriate degree of mixing, and space for the separation of the sexes,
 - iv. access to (small) kitchen facilities suited to age and level of supervision.
- a. Sanitary facilities:
 - i. separate provision for boys and girls,
 - ii. no health hazards and sufficient ventilation in bath or shower rooms, and
 - iii. where there are urinals and WCs., it is essential that all WC doors can be locked from the inside and that showers and bathrooms have proper privacy,
 - iv. water provided at a constant, comfortable and safe temperature.
- a. Heating:
 - i. should be at a comfortable temperature and there should be ambient heating throughout the living rooms.
- a. Grounds:
 - i. they are a valuable resource but they should not be treated as an substitute for adequate indoor space,
 - ii. the principles concerned with the different kinds of space suited to age and gender apply equally to playgrounds, playing fields and parkland.

Schools are not expected to provide within their own premises all the facilities needed by pupils to allow them to lead a normal life. They should, however, provide reasonable opportunities for pupils to use sporting and other recreational activities in the locality.

HEALTH

- 43 The Department of Health and Social Security will be mindful of the importance of a child's health and his or her life chances and welfare. If, during an inspection, the Department finds evidence of health problems, this will be drawn to the attention of the proprietor with

suggestions for appropriate referral.

- 44 Schools usually appoint a local general practitioner as School Medical Officer. He or she will be responsible to the head and/or governing body for advising on all matters affecting health at the school.

Registration with a GP

- 45 All children at an independent boarding school should normally be registered with a GP, often with the School Medical Officer. If a school doctor is not employed the pupils should be registered with a local general practitioner, so that every child may have confidential access to a doctor when necessary.
- 46 The right of 16 year olds and above to choose their own practitioner should be recognised. A child may reasonably wish to consult a doctor in whom they have confidence, for example, one of the same gender as themselves.

Promoting healthy living

- 47 The health care of children living away from their parents requires particular vigilance. To fulfil this role schools should consider:
- a. seeking advice from the School Health Service, the School Medical Officer, or a local general practitioner with a knowledge of services and resources, including paediatricians,
 - b. employing a suitably qualified nurse,
 - c. encouraging children and young people to follow a healthy lifestyle, including:
 - i. healthy diet,
 - ii. regular physical activity
 - iii. avoiding smoking and excess alcohol.
 - a. establishing a good standard of hygiene in all parts of the school used by children by:
 - i. asking the School Medical Officer to regularly inspect food preparation areas, dining rooms, dormitories and washing facilities, and advise the school accordingly, and
 - ii. seeking help from the Environmental Health Service where necessary.
 - a. establishing a system for notification by the school of death, accident, serious illness, infectious disease or other serious harm,
 - b. maintaining a sanatorium. All but the smallest boarding schools should have a sanatorium to centralise the provision

for sick pupils and allow for supervision by trained staff,

- c. providing a consulting room and/or treatment room, and a secure, locked room or cupboard for medicines and drugs. Simple medication, such as paracetamol or cough linctus, which is administered by non-trained staff in boarding houses, should also be kept in a lockable cupboard.

Notifications of health matters

- 48 In the event of illness or death notifications should be made to:
- a. parents, guardians, or placing authorities,
 - b. the Department of Education,
 - c. The Department of Health and Social Security.

SAFETY

- 49 Proprietors and head teachers should ensure that the staff and pupils are aware of fire precautions.
- 50 There should be regular fire practice drills and fire alarm tests. These should be carried out at various times, including at night. The date, time, duration and description should be recorded.

CONTACT WITH PARENTS, RELATIONS AND VISITORS

- 51 Children should be enabled to maintain contact with their parents, relatives and friends in privacy, including:
- a. by payphone, and
 - b. through the provision of private space for visits.

Mail and confidentiality

- 52 As far as possible children's mail should be treated as private to them. Where it is necessary for staff to be aware of the contents of letters received by older children, this should be achieved by the individual opening mail in front of a staff member.
- 53 For very young children it may be necessary in the interests of the child and with the parents' agreement, for staff to open mail before it is handed to the child - for example where parents are separated.

RELIGIOUS AND CULTURAL ETHOS

- 54 Schools should be sensitive to the religious, cultural, racial and linguistic background and beliefs of children. The prospectus should provide a statement about these matters.
- 55 The Department of Health and Social Security will also show sensitivity towards pupils' religious and cultural ethos in the way

inspections are carried out and evaluations are written.

Schools should ensure equality of opportunity to girls and boys.

PERSONAL RELATIONS AND DISCIPLINE

- 56 The two key principles are to:
- a. do what is reasonable in all circumstances to safeguard and promote the child's welfare,
 - b. take a broad view of discipline, based on good personal and professional relationships, in the broad context of school life.
- 57 Maintaining good discipline is of paramount importance for the growth, welfare and development of children in boarding schools, where pupils live in close contact with peers who behave in a variety of ways.

Essential factors

- 58 A pleasant and well-disciplined atmosphere depends upon:
- a. relationships of mutual respect and understanding between boarders and staff,
 - b. the quality of relationships between boarders, which should, for example, avoid exploitation of junior pupils by seniors,
 - c. having sufficient staff on duty during evenings, weekends and other "out of class" times to permit contact between boarders and staff which allows positive relations to develop,
 - d. the quality of the environment and the space available to boarders,

See Standards of Accommodation above, page 12

- e. the level of responsibility and participation in decision-making offered to boarders in relation to their living space, activities, and everyday organisation,
- f. how senior pupils assist staff in maintaining discipline,
- g. the organisation of the boarders' day and the balance between organised and free time, and
- h. the make up of the school community, for example:
 - i. whether there is single-sex or mixed boarding,
 - ii. the ethnic and cultural mix of the house,
 - iii. the age range and balance between age groups,
 - iv. the presence of children with emotional and/or behavioural problems.

Standards of behaviour and policy on discipline

	<p>59 Independent schools should have a clear policy on the standard of behaviour expected, how it is to be maintained and how unacceptable behaviour will be tackled.</p> <p>60 Schools should ensure that parents are aware of the policies on behaviour and discipline, and should aim to secure their support for putting them into practice.</p> <p>61 The Department should be made aware of the school's policies. It will have regard to the duty required by the Act to safeguard and promote children's welfare.</p> <p>Signatories to the United Nations Convention on the Rights of the Child (of which the Isle of Man is one) and the Human Rights Convention may not use punishment which is so severe as to constitute inhuman or degrading treatment.</p> <p>Rewards and sanctions</p> <p>62 There should be a system of rewards (commendations, extension of privileges etc) as well as sanctions.</p> <p>63 Children should be encouraged to behave well by staff frequently expressing approval and by generous use of rewards rather than sanctions.</p> <p>64 Sanctions can include:</p> <ol style="list-style-type: none"> a. temporary removal of privileges, b. mild or moderate verbal reprimand, c. additional household chores, and d. restriction of leisure activities. <p>65 Sanctions which are unproductive or involve educational activities, such as essay writing, should be avoided.</p> <p>66 In all instances punishments and sanctions need to be:</p> <ol style="list-style-type: none"> a. consistent with the cultural ethos and declared policy of the school, applied fairly and consistently, making the distinction between minor and serious matters clear, and b. allow a degree of flexibility for individual circumstances, <p>67 The imposition of sanctions should be clearly recorded, stating:</p> <ol style="list-style-type: none"> a. the nature of the transgression, and b. the nature of the sanction. <p>68 Sanctions should be subject to monitoring by a senior member of staff. The record should be available to parents.</p>
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RESTRICTION OF LIBERTY

- 69 Restricting a child's liberty is a serious step. It should never be used because:
- a. of inadequacies in staffing,
 - b. a child is simply being a nuisance or disruptive, or
 - c. as a form of punishment.

Proprietors and school heads should be aware of the possibility that restricting liberty without specific legal authority may make them liable to civil court action.

COMPLAINTS

Policy

- 70 There should be clear and accessible avenues for children to alert an appropriate adult to situations which cause them distress. The ages of the children should be taken into account when considering what arrangements would be appropriate.
- 71 The school's policy should give information about how a complaint can be made to the Department of Health and Social Security. The Department will wish to inspect records of complaints routinely during school visits.
- 72 The school will satisfactorily deal with most complaints, but there should be arrangements for children to register complaints in confidence to a person not on the school staff, or connected with running it, about any matter to do with the children's welfare of the child as described in this guidance.
- 73 Provision for contact with an adult outside the school's structure should include telephone Help Lines for use in those situations where an additional element of confidentiality or independence is needed.

Procedures

- 74 While the aim should always be to identify and resolve issues informally, a clear and straightforward procedure should be available so that children can raise concerns which cannot be satisfactorily dealt with informally.
- 75 Information about the procedure should be available in writing and this should be given to all children and staff, as well as parents.
- 76 A senior staff member should be responsible for the complaints procedure. A designated person should be responsible for acknowledging and responding to questions and complaints, both informal and formal.
- 77 Time limits should be set for the written acknowledgement of

	<p>complaints, whether oral (including telephoned) or written complaints.</p> <p>The complaints procedure should not replace the normal means for dealing with minor problems.</p> <p>Complaints should always be dealt with promptly and confidentially.</p> <p>78 Distinction should be made between informal and formal complaints.</p> <p>Informal complaints</p> <p>79 This need not necessarily involve a written submission, but the complaint should be recorded, as well as the action taken.</p> <p>80 Resolution between the people immediately involved should be encouraged. Mediation – advice, information, discussion and explanation - can also help to promote informal resolution.</p> <p>Formal complaints</p> <p>81 Formal complaints should be made in writing if possible (although not necessarily written by the complainant child) and should trigger a formal response.</p> <p>82 Investigation of formal complaints should always involve someone independent of the school. This could be an officer, or a member of staff from the Department of Health and Social Security or the Department of Education.</p> <p>Independent schools may wish to be aware of guidance on complaints procedures for children's homes and other children looked after by the Department</p> <p>See Volume D in this series.</p>
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