

# **GUIDANCE FOR COMPLETING THE SELF-EVALUATION FORM**

## Use of the SIEF

Schools may wish to use the School Information and Self Evaluation Form (SIEF) for their own self-evaluation at times when they are not expecting a BSI inspection. However, when the SIEF is used as a preparation for an inspection, which is thought to be imminent, then schools will need to ensure that inspectors have access to all the documents referred to in the SIEF. For convenience, a list of the documentation normally needed for an inspection is appended to this guidance.

## Information about pupils for whom English is not the principal language of their home

It would be difficult, if not impossible, to give a precise definition of 'the principal language' of the home: some bilingual families will use two languages in the home more or less equally, and some bilingual children may talk English to one of their parents and another language to the other. In answering the question about how many pupils fall into this category, schools should make their best estimate based on what they know about their pupils and the homes from which they come. The second question, about the number of pupils who are at an early stage of learning English, should be answered in the light of the guidance given in *A Language in Common: Assessing English as an Additional Language*, QCA, 2000. Pupils who are at an early stage of learning English will be those who are at Step 1 or Step 2 or the threshold stage of Level 1 as described in the QCA document.

The details about the way in which the school supports these pupils should not just be about the support given to pupils at an early stage of learning English, important as this may be. Bilingual and multi-lingual pupils also need continuing support by the careful introduction of specialist vocabulary and most of all through the value that the school gives to the pupils' competence in languages other than English. Where bilingual and multi-lingual skills are valued, pupils are encouraged to develop their skills in their home language and, at an appropriate age, to take recognised qualifications such as GCSEs in them.

## 1. The quality of education provided by the school

### The quality of the curriculum

#### ***1(2) Does the school have a curriculum policy set out in writing and supported by appropriate plans and schemes of work, and does it implement it effectively?***

The written curriculum statement does not need to be long or detailed, but it must be made available to parents (Regulation 6(3)(c)) and it must be implemented effectively. It must therefore be an accurate summary of the curriculum experienced by the pupils.

There must be some written planning and schemes of work. However, the schemes of work do not have to be devised by the school, but can be national materials such as QCA documents or commercial schemes.

DCSF guidance on appropriate plans and schemes of work is as follows:

*'The school should prepare curriculum policy statements, setting out in general terms how each subject is to be taught, how work will be planned to meet the needs of pupils, what the implications of the subject are for the school's particular pupil group. The policy statements may set out the general principles of assessment, recording, accreditation and of reporting on progress for the subject, or this may be covered in a separate overall policy on assessment, recording and reporting.*

*Timetables for classes or individuals will provide further information as to how the curriculum is to be managed, particularly with regard to the balance and coverage of subjects taught.*

*The schemes of work should set out the range of topics for each subject to be taught over each term, how individual topics are to be taught, what resources will be used, and what opportunities will be taken for assessing pupils' learning and progress. A week-by-week breakdown is often used. It is usual for schemes to set out objectives for learning within each topic, and for these objectives to be featured in planning for individual lessons and in assessment. The best schemes set out differentiated content and approaches for the different levels of capability and need (not least in terms of literacy) amongst the pupils. They also make reference to links between subjects - such as noting opportunities to use ICT and literacy/numeracy skills within the topic.'*

**1(2)(a)(i) Is there full-time supervised education for pupils of statutory school age?**

There is no statutory definition of full-time education for independent schools. The guidance in the DCSF information pack says that "there are no mandatory regulations for independent schools. However, they are expected to follow the guidelines for maintained schools i.e.:

- pupils are required to attend school for at least 190 days a year (38 weeks);
- with provision for at least 380 sessions;
- a session being regarded as at least a 2 hour period morning or afternoon."

DCSF guidance recommends minimum amounts of taught time per week for different key stages, from 21 hours for Key Stage 1 to 24 hours for Key Stage 4.

'Supervised education' will normally mean that there is a teacher or other responsible adult present, or in the vicinity, to help the pupils in their learning as well as to ensure their safety and well-being. Pupils who are marked on the register as attending an approved educational activity for part of the week, off-site, may still be receiving 'full-time, supervised education'. See page 12 for details of the circumstances in which pupils can be registered as attending an approved educational activity.

Pupils become of compulsory school age on 1 January, 1 April or 1 September immediately following their fifth birthday and remain of statutory school age until the

last Friday of June in the school year (1 September to 31 August) in which their sixteenth birthday falls.

It is permissible for pupils below or above compulsory school age to attend part-time. It is also permissible for pupils of statutory school age, who are being educated outside school, to attend an independent school part-time. It is the responsibility of the parents to ensure that children educated outside school receive the appropriate amount and level of instruction and to inform the LA. The matter of whether the instruction for these pupils is suitable and efficient is for the LA to monitor.

**1(2)(a)(ii) *Does the curriculum give pupils of compulsory school age in the following areas of learning: linguistic, mathematical, scientific, technological, human and social, physical, and aesthetic and creative?***

The regulations are not intended to be prescriptive about the way a school organises its curriculum, and do not require schools to follow the National Curriculum, but they should give experience in the following broad areas of learning although these do not need to be delivered through separately timetabled subjects. Plans and schemes of work must, however, illustrate how each area is to be woven into the school curriculum.

**Linguistic:** this area is concerned with developing pupils' communication skills and increasing their command of language through listening, speaking, reading and writing. In most schools, these skills will primarily be developed in English. Many schools will also teach other languages and some will use a language other than English as the main medium of instruction. Schools will normally be expected to offer pupils the chance to learn a modern foreign language, at least as part of their secondary education. In schools where English is not the main medium of instruction there must be lessons in written and spoken English, unless the school is solely for pupils who are temporarily resident in this country and are following the curriculum of another country (Regulation 1(2)(d)).

**Mathematical:** this area helps pupils to make calculations, to understand and appreciate relationships and patterns in number and space and to develop their capacity to think logically and express themselves clearly. Their knowledge and understanding of mathematics should be developed in a variety of ways, including practical activity, exploration and discussion.

**Scientific:** this area is concerned with increasing pupils' knowledge and understanding of living things, materials and physical processes and with developing the skills associated with science as a process of enquiry; for example, observing, forming hypotheses, conducting experiments and recording their findings.

**Technological:** this area will include some or all of the following components: the use of information and communication technology (ICT); developing, planning and communicating ideas; working with tools, equipment, materials and components to produce good quality products; and evaluating processes and products.

**Human and social:** this area is concerned with people and how they live, with their relationships with each other and with their environment, and how human action,

now and in the past, has influenced events and conditions. In most schools the subjects of history and geography make a strong contribution to this area.

**Physical:** this area aims to develop the pupils' physical control and co-ordination as well as their tactical skills and imaginative responses, and to help them to evaluate and improve their performance. Pupils should also acquire knowledge and understanding of the basic principles of fitness and health.

**Aesthetic and creative:** this area is concerned with developing the pupils' capacity to respond emotionally and intellectually to sensory experience and to appreciate beauty and fitness for purpose. It involves the exploration and understanding of feelings and the processes of making, composing and inventing. There are aesthetic and creative aspects of all subjects, but some make a particularly strong contribution including art, music, dance, drama and the study of literature because they call for personal, imaginative, and often practical, responses.

The regulation does not require that all areas of learning are represented in the weekly timetable, but that pupils are given experience of them all at some stage during the term or year. In particular, it would be unreasonable to expect Key Stage 4 pupils at independent schools to follow a curriculum that is broader than that required in the maintained sector.

**1(2)(e) *Where pupils have a statement, does the education provided fulfil its requirements?***

This applies to every pupil for whom a statement is maintained, whether they are paid for by the LA or their parents. Part 3 of the statement sets out the special educational provision that the LA considers necessary to meet the child's special educational needs; this must be provided by the school. Where pupils' statements specify that they should have access to the full National Curriculum, then schools must provide it.

LAs have a duty to review statements annually. In practice, LAs rarely change statements; usually only when a pupil moves to a different school. The most recent annual review is generally regarded as updating the statement.

The school should also provide access to therapy (eg speech and language therapy, physiotherapy) where this is required in the statement and has not been discontinued by a subsequent annual review.

**1(2)(f) *Does the school provide personal, social and health education which reflects its aims and ethos?***

The regulation does not prescribe how PSHE is to be delivered: it could be as a separate subject; it could be through other subjects; it could be in tutorial periods; or, in many faith schools, it could be in the context of religious instruction. As with all regulations in this section, it should be supported by 'appropriate plans and schemes of work'. There must, therefore, be an organised and coherent programme that is appropriate to the individual needs of pupils. The regulation explicitly recognises that PSHE should reflect the school's aims and ethos.

**1(2)(g) Does the school provide appropriate careers guidance for secondary age pupils?**

At the least, schools should offer pupils in Key Stage 3 advice on their choices of options for GCSE or other courses, and pupils in Key Stage 4 and beyond advice on future pathways. Specific careers education and guidance often start in Year 9. The best programmes offer systematic information about careers, access to individual guidance, direct experience of the world of work and access to up-to-date information about work, further and higher education, training and career opportunities. Guidance should help students to develop self-awareness and to recognise their talents, strengths and weaknesses in order to explore future options realistically.

**1(2)(h) If there are pupils above compulsory school age, does the school provide a programme of activities appropriate to their needs?**

For pupils of this age, it is particularly important that they receive 'adequate preparation for the opportunities, responsibilities and experiences of adult life' (Regulation 1(2)(j)). Beyond that, there can be considerable flexibility taking account of their aspirations and interests as well as of their needs. It would be unreasonable to expect the post-16 curriculum in independent schools to be more constrained than that which is offered in maintained schools and colleges.

**1(2)(i) Does the curriculum provide the opportunity for all pupils to learn and make progress?**

The curriculum must not deny opportunities to individual pupils or groups of pupils, whether these groups are characterised by ability, previous attainment, behaviour patterns, disability, gender, ethnicity, linguistic background or any other criteria.

**1(2)(j) Is there adequate preparation of pupils for the opportunities, responsibilities and experiences of adult life?**

While this regulation applies to all schools, it is clear that it applies with most force to those schools in which pupils stay up to or beyond school leaving age.

**8 a, b and c Expectations of the school's faith association concerning the curriculum**

These expectations are not just about religious studies but are about the overall coherence of the whole curriculum, which in every subject should be planned and implemented to reflect a consistent vision and worldview. There should be evidence of regular review and development to improve the whole curriculum. The curriculum should be a coherent expression of the faith commitment that underpins it.

## Teaching and assessment

**1(3)(a) Does the teaching enable pupils to acquire new knowledge, and make progress according to their ability so that they increase their understanding and develop their skills in the subjects taught?**

**1(3)(b) Does the teaching encourage pupils to apply intellectual, physical or creative efforts and to show interest in their work and to think and learn for themselves?**

**1(3)(c) Are lessons well planned, effective teaching methods and suitable activities used and is class time managed wisely?**

**1(3)(d) Do teachers show a good understanding of the aptitudes, needs and prior attainments, of the pupils, and ensure that these are taken into account in the planning of lessons?**

**1(3)(e) Do teachers demonstrate appropriate knowledge and understanding of the subject matter being taught?**

**1(3)(f) Are classroom resources of an adequate quality, quantity and range and are they used effectively?**

**1(3)(g) Is there a framework in place to assess pupils' work regularly and thoroughly and is information from such assessment utilised to plan teaching so that pupils can make progress?**

**1(3)(h) Does the teaching utilise effective strategies for managing behaviour and encouraging pupils to act responsibly?**

If the school's senior leaders undertake a regular programme of lesson observations, these will provide the main evidence for the self-evaluation of the eight regulations concerned with teaching. The senior leaders may gather further useful evidence from looking at pupils' work, discussions with teachers and pupils and examining the teachers' planning and record keeping.

**1(4) Does the school have in place a framework by which pupil performance can be evaluated by reference to either the school's own aims, as provided to parents, and/or, by national norms?**

While independent schools are not obliged to use National Curriculum assessments, many choose to do so, either wholly or in part. Additionally, or alternatively, many schools use a range of standardised tests, which also provide a reference to national norms, provided they are not too out-of-date.

If the school uses National Curriculum assessments and they are moderated at Key Stage 1 and the tests are externally marked at Key Stage 2, then this regulation is met. If there is no moderation or external marking then schools need to be sure that the assessments and tests are properly administered and accurately marked.

If standardised tests are used, these must also be properly administered and accurately marked. If the school does not use National Curriculum assessments, the standardised tests should measure a reasonable range of performance including literacy and numeracy.

If the school measures performance solely by reference to its own aims, these aims must be included in the statement of ethos and aims provided to parents (Regulation 6(2)(d)).

**8 d, e and f *Expectations of the school's faith association concerning the teaching***

These expectations apply across all religious and secular subjects, so that pupils are able to make connections, discern underlying patterns and appreciate how their faith provides a deeper understanding. The teaching should demonstrate a faith commitment that enables pupils to develop a coherent faith-based perspective.

**2. The spiritual, moral, social and cultural development of pupils**

**2(a) *Does the school enable pupils to develop their self-knowledge, self-esteem and self-confidence?***

Spirituality should extend beyond worship into acquiring a sense of identity, self-worth, personal insight, meaning and purpose, within a system that gives opportunities to explore values and beliefs and the way in which they affect people's lives.

**2(d) *Does it provide pupils with a broad general knowledge of public institutions and services in England?***

The way in which this regulation applies will vary according to the age range of the pupils. For older pupils, schools should have regard to the QCA guide-lines on citizenship.

**2(e) *Does the school assist pupils to acquire an appreciation of and respect for their own and other cultures, in a way that promotes tolerance and harmony between different cultural traditions?***

This is a twofold requirement, both parts of which are very important: pupils should be secure and confident in their own faith and culture; they should also respect the right of others to hold different beliefs and they should learn to live in harmony with them.

**8 g, h, i and j *Expectations of the school's faith association concerning the pupils' spiritual, moral, social and cultural development***

These expectations are fundamental to the purpose of the school. The school's faith should provide a focus for spirituality, a reason for morality, a social experience of living in a faith community and an insight into the religious dimension of culture.

Prayer and worship should be at the heart of the pupils' experience and should make a major contribution to their spiritual development.

The standards and values of the school's faith should give reason and purpose to the pupils' behaviour, so that they acquire a moral understanding of how they should behave and relate to one another.

The school needs to recognise that prevailing values and worldviews will present pupils with dilemmas and temptations. They need to be addressed so that pupils are given help in standing up to the pressures and influences they face in the modern world outside the relative safety of the school environment. The pupils need to be equipped to be discerning about such things as materialism so that they can make choices consistent with their faith.

At the same time, their attitudes to other faiths and worldviews should always lead them to treat all people with respect.

### **3. The welfare, health and safety of the pupils**

#### ***3(2)(a) Has the school prepared and implemented a written policy to prevent bullying in accordance with the DCSF guidance "Safe to Learn: Embedding anti-bullying work in schools" ?***

The school must have a written policy, and should evaluate whether it is being effectively implemented. Staff should be aware of the policy and alert to its implications. Teachers and pupils should know what actions they should take in response to incidents of bullying. The school should have effective means of detecting and combating bullying in all its different forms. Pupils should show confidence in the school's strategies for dealing with bullying and should feel safe. The updated DCSF guidance can be found at

<http://www.teachernet.gov.uk/wholeschool/behaviour/tacklingbullying/safetolearn>

#### ***3(2)(b) Has the school prepared and implemented a written policy to safeguard and promote the welfare of children who are pupils at the school in compliance with the DCSF Guidance "Safeguarding children and safer recruitment in education 2007" (SCSRE)?***

Safeguarding is about protecting children from maltreatment, preventing impairment of health/development, ensuring children grow up in the provision of safe and effective care, and is about optimising children's life chances. It, therefore, covers more than child protection.

The policy should have clear aims that will normally include the wider aspects of safeguarding (e.g. safe recruitment / allegations against staff), though these may be in separate policies which should be cross-referenced.

There must be a senior member of the school's own staff with designated responsibility for child protection and welfare issues and for liaison with the Local Authority and the Local Safeguarding Children Board (LSCB). Staff should know who this is.

Clear procedures should be in place, which must be in line with those of the LSCB. These should refer to

- the designated person(s) and the management of child protection
- staff training, specifying that the designated person(s) should receive refresher training at least every two years, and the rest of the staff at least every three years.
- recognition of signs of abuse
- an understanding of the need to be alert to signs of abuse and the procedures to follow
- notification procedures (including those relating to the unexplained absence of pupils on the child protection register)
- multi-agency working and the role of the school at child protection case conferences
- the keeping of records of concerns
- the administration of secure records which are to be kept separate from the main files on pupils
- the procedures to follow where an allegation is made against a member of staff or volunteer (this can be separate)
- ways of ensuring that safe recruitment practices are always followed (this can be separate).

The policy should also outline how pupils are to be supported through the curriculum and particularly PSHE; how a positive, supportive and secure environment is promoted; and how pupils are given a sense of being valued, perhaps referring to other policies such as behaviour and anti-bullying.

It is the responsibility of the proprietor to oversee the safeguarding policy and procedures and review them annually. The designated child protection person(s) must fully understand their roles and responsibilities. In a large establishment (or on several sites) one or more deputies may be required. Where there are separate boys and girls sections in one school, there may need to be a designated person of each gender. All staff, including the designated person(s), must be trained at the required intervals and to the appropriate level.

All schools must have procedures for dealing with allegations of abuse against staff (including volunteers) and all staff must know what to do if they receive an allegation against another member of staff or if they have concerns about a member of staff. The requirements are contained in Chapter 5 of SCSRE.

**3 (2) (c) *Has the school prepared and implemented a written policy relating to the health and safety of pupils on activities outside the school which has regard to DCSF guidance (reference HSPV2): "Health and Safety of Pupils on Educational Visits"?***

Any visits or other activities that take place outside the school should be carefully planned and an assessment should be made of the risks to the pupils' health and safety. The head teacher's prior agreement should be obtained, and for many visits the written consent of parents is required. The group leader should be appropriately experienced and qualified and there should be sufficient adults bearing in mind the age of the pupils and the nature of the activities.

**3 (2) (d) Has the school prepared and implemented a written policy to promote good behaviour amongst pupils which sets out the sanctions to be adopted in the event of pupils misbehaving?**

The school must have a written policy, and should evaluate whether it is being effectively implemented by monitoring behaviour in lessons and around the school and noting whether good behaviour is promoted, commended and rewarded. Schools may use a range of sanctions, but these should be proportionate to the offence and should be effective in discouraging re-offending.

**3(4) Does the school have regard to the DCSF guidance "Health and Safety: Responsibilities and Powers" (DCSF/0803/2001)?**

The guidance can be found at [www.teachernet.gov.uk/doc/955/ACF1BCF.doc](http://www.teachernet.gov.uk/doc/955/ACF1BCF.doc) . It sets out the duties of employers (usually the proprietor or governing body in independent schools) and of employees. Employers have duties to ensure so far as is reasonably practicable: the health, safety and welfare of teachers and other education staff; the health and safety of pupils in school and on off-site visits; and the health and safety of visitors to schools, and volunteers involved in any school activity. Employees must: take reasonable care of their own and others' health and safety; co-operate with their employers; carry out activities in accordance with training and instructions; and inform the employer of any serious risks.

**3(5) Does the school comply with the Regulatory Reform (Fire Safety) Order 2005?**

The Regulatory Reform (Fire Safety) Order 2005 was introduced on 1 October 2006. DCSF guidance states that 'the order places responsibility on a 'responsible person', which in the case of an independent school is the proprietor. Under the order the 'responsible person' has a duty to:

- carry out a fire risk assessment (formally recorded and regularly reviewed so as to keep it up to date);
- produce a fire risk policy which includes the elimination or reduction of risks from dangerous substances;
- develop fire procedures and provide staff training (repeated periodically where appropriate);
- ensure the safety of staff or anyone else legally on the school premises;
- carry out fire drills and contact emergency services when necessary;
- appoint one or more competent persons (with sufficient training, experience and knowledge) to assist in taking preventive and protective measures (including fire fighting and evacuation);
- have a suitable system for the maintenance of: clear emergency routes and exits (with doors opening in the direction of escape), signs, notices,

emergency lighting where required, fire detectors, alarms and extinguishers (the maintenance should be by a 'competent person' (for example, ISO9001 certified or BAFE approved);

- provide staff and any others working on the school site with fire safety information.

Additionally, staff are required to take reasonable care.

The Fire Risk Assessment should be reviewed regularly and revised in light of any changes that occur at the school. Local Fire Services will inspect independent schools in the same way as any other business i.e. on a risk basis.'

**3(6) *Does the school have a satisfactory written policy on First Aid and does it implement this?***

The school must have a written policy, and should evaluate whether it is being effectively implemented. Effective implementation should ensure that:

- all staff know which of their colleagues are qualified to give First Aid and refer any accidents or other medical emergencies to them promptly
- at all times there is at least one designated First-Aider on every site occupied by the school, and on every outing organised by the school
- all First-Aiders have attended a training course within the last three years, follow the guidelines given at the course, and have easy access to First Aid kits
- accidents and other medical emergencies are recorded appropriately, parents are informed when necessary and a record is kept of occasions when they have been
- members of staff are aware of any particular hazards in the subjects that they teach or the activities that they supervise and have appropriate training and access to First Aid kits
- pupils with medical conditions, such as asthma or severe allergies, are identified and all staff are aware of their conditions and alert to the need for prompt action
- there is clear guidance on what levels of injury are to be treated on site and what levels automatically trigger an emergency ambulance call or visit to the hospital
- there is guidance on hygiene procedures in case of spillage of blood or body fluid.

**3(7) Are school staff deployed in such a way as to ensure the proper supervision of pupils?**

Schools should make sensible evaluations, taking into account the age and behaviour of the pupils and the nature of the activities in which they are engaged. 'Proper supervision' does not require that pupils must always be within sight of an adult, but they should be able to summon help quickly in the event of an emergency. Similarly, where one adult is supervising a group of pupils at some distance from any of their colleagues, they will need a mobile phone, or some other method of rapid communication.

**3(8) Does the school keep written records of sanctions imposed upon pupils for serious disciplinary offences?**

The regulation does not prescribe the form of these records, but they can be expected to include the reasons for the sanctions as well as their nature and the dates on which they took place. Schools must ensure that sanctions are reasonable and not excessive and do not show unfair discrimination against individuals or categories of pupils. The written records may be kept together, in a punishment book or in a loose leaf file, or they may be distributed among pupils' files, though best practice is to do both: to keep a bound copy of all sanctions and to place a record of them in pupils' files. The records should certainly include temporary or permanent exclusions and may also include detentions or other punishments.

If a school has never imposed sanctions upon pupils for serious disciplinary offences, then this regulation is met, although the school should be aware of its duty to keep written records, if sanctions are imposed in the future. The school may in any case wish to prepare a 'sanctions record book' which may take the form of an appropriately labelled exercise book or similar.

The School Standards and Framework Act 1998 prohibits corporal punishment in independent schools.

**3(9) Does the school maintain an admission and attendance register in accordance with the Education (Pupil Registration) Regulations 2006?**

The Education (Pupil Registration) (England) Regulations 2006, Statutory Instrument 2006/1751, replaced the 1995 regulations and the two amendments that had been made to them. Many of the regulations remain the same as before, but there are some important changes. As the Explanatory Memorandum to the regulations states: 'These regulations widen the scope for pupils to register at more than one school and bring the storage of registers in line with developments in information technology. They also make changes to the grounds upon which a pupil's name may be deleted from the admissions register. They extend the circumstances in which a return must be made to the local education authority and require that the return is made prior to the deletion of the pupil's name.' The full regulations, together with the Explanatory Memorandum, are available from [www.opsi.gov.uk](http://www.opsi.gov.uk).

All schools are required to keep an admission register which contains an index in alphabetical order of all the pupils at the school and the following information about each pupil:

- name in full
- sex
- the name and address of every person known to the proprietor to be a parent of the pupil and, against the entry on the register of the particulars of any parent with whom the pupil normally resides, an indication of that fact and an emergency telephone number
- day, month and year of birth
- day, month and year of admission or re-admission to the school
- name and address of the school last attended, if any
- in boarding schools, whether the pupil is a boarder or a day pupil.

The name of a pupil must be included in the admission register from the beginning of the day on which it has been agreed that the pupil will start.

All schools, except those in which all pupils are boarders, are required to keep an attendance register which:

- must be taken at the beginning of each morning session and once during each afternoon session
- must record for every day pupil, whose name is entered in and not deleted from the admission register, whether the pupil is present; absent; attending an approved educational activity; or unable to attend due to exceptional circumstances
- must distinguish between authorised and unauthorised absence for all day pupils of compulsory school age
- must record, for any day pupil of compulsory school age who is attending an approved educational activity, the nature of that activity
- must record, for any day pupil who is unable to attend due to exceptional circumstances, the nature of those circumstances.

There is no legal requirement to include boarders in the attendance register, though most boarding schools do so and should be encouraged to continue this good practice.

All pupils who are registered at more than one school, or pupils who attend other educational provision such as further education colleges or specialist providers, can be marked as present at an approved educational activity when they attend the other school or alternative provision. Likewise, where a pupil is taking part in an activity that takes place outside the school premises and is approved by the proprietor or someone authorised to do so on the proprietor's behalf; is of an educational nature, such as work experience or a sporting activity; and is supervised by someone who is authorised by the proprietor or the head teacher, that pupil can also be recorded as attending an approved educational activity while taking part in the activity. 'Unable to attend due to exceptional circumstances' is narrowly defined and includes only

occasions when the school site or part of it is closed, or, for pupils for whom transport is provided by the local authority, when that transport is not available.

Admission and attendance registers must be completed in ink and every entry must be kept for at least three years. Where any amendments are made, the register must include the original entry; the amended entry; the reason for the amendment; the date on which the amendment was made; and the name or title of the person who made the amendment. Registers may be kept on computer provided a back-up, in the form of an electronic, micro-fiche or printed copy, is made at least once a month. Where a correction is made, the register on the computer, and any print-out made of it, must distinguish clearly between the original entry and the correction. An electronic, micro-fiche or printed copy of all registers kept on computer must be retained for three years after the end of the school year to which they refer. Note: there is no longer a requirement that print-outs should be made; the requirement is only that there is some form of back-up, which may be electronic rather than hard copy.

All schools, including independent schools, are required to inform the local authority of the full name and address of any registered pupil of compulsory school age who fails to attend the school regularly, or who has been absent without authorisation for a period of more than ten school days, specifying the cause of absence if it is known. This requirement does not apply if the irregular attendances or the prolonged absences are because the pupil is attending another school at which the pupil is registered, or because the pupil is attending an approved educational activity.

In addition, all schools, including independent schools, are required to inform the local authority about any pupil of compulsory school age who is to be deleted from the school's admission register for one of the following reasons:

- that the pupil has ceased to attend the school and the proprietor has been informed in writing by the parents that the pupil is receiving education otherwise than at school
- that a day pupil has ceased to attend the school and no longer lives locally
- that a pupil is so ill that the school medical officer does not think that the pupil will be fit enough to attend school before ceasing to be of compulsory school age, and the school has not been informed of any intention to attend the school after ceasing to be of compulsory school age
- that the pupil is in custody for at least four months and there are no reasonable grounds for believing that the pupil will return to the school at the end of the period
- that the pupil has been permanently excluded.

In these cases, the school must give the local authority the full name of the pupil, the address of any parent with whom the pupil normally resides and the grounds on which the pupil is to be deleted from the admission register. The information must

be given as soon as the grounds for deletion are met and before the pupil is deleted from the admission register.

There are nine other grounds for deletion from an attendance register, including one very general one only applicable to independent schools, that a pupil 'has ceased to be a pupil of the school 8 (1) (l).' Deletions on any of these nine grounds do not have to be reported to the local authority. However, even if deletions are made under 8 (1) (l), it is good practice for schools to keep the local authority informed of cases which could be construed as falling into one of the five categories described above.

### ***Does the school fulfil its duties under the Disability Discrimination Act?***

The Special Educational Needs and Disability Act 2001 amends Part 4 of the Disability Discrimination Act 1995 to make it applicable to schools. The DCSF have issued the following guidance:

#### **'What are the requirements on Disability Discrimination in Schools?'**

The Disability Discrimination Act 1995 covers every aspect of education. The duties make it unlawful to discriminate, without justification, against disabled pupils and prospective pupils, in all aspects of school life. The principle behind this legislation is that, wherever possible, disabled people should have the same opportunities as non-disabled people in their access to education.

#### **What provision is covered?**

Education provided at all schools in Scotland, England and Wales is covered by the Act. This includes all independent schools including nursery classes and nursery provision at independent settings.

#### **Who is responsible for the schools' duties?**

The Responsible Body (those responsible for the duty not to discriminate) within independent schools and non-maintained special schools is the proprietor.

The Education Act 1996 says that the proprietor is the person or the group of people responsible for the management of the school. This will vary according to the type of school but would include the trustees, the governing body, the private owner or the management group of the school.

#### **What activities are covered by the schools' duties?**

Responsible bodies must not discriminate against a disabled person in relation to admissions to and exclusions from school. This applies to both fixed term and permanent exclusions. Every aspect of education and associated services such as timetabling, homework, school trips, clubs and activities is covered by the Act.

### Definition of Disability

“A person has a disability if he or she has a physical or mental impairment that has a substantial and long term adverse effect on his or her ability to carry out normal day to day activities.”

### Special Educational Needs and Disability Tribunal (SENDIST)

From September 2002 the Special Educational Needs Tribunal has an extended remit and is renamed the Special Educational Needs and Disability Tribunal (SENDIST). SENDIST considers most claims of unlawful discrimination in admissions, exclusions and in education and associated services in schools.

SENDIST is able to order remedies and set deadlines when directing action by schools and LAs. If a responsible body fails to comply within the prescribed time limits, or if it has acted or is proposing to act unreasonably in complying with a SENDIST order, the Secretary of State can make a direction to require compliance.

### Planning Duties: Preparing Accessibility Plans

Independent schools are obliged to prepare accessibility plans to:

- increase the extent to which disabled pupils can participate in the school's curriculum;
- improve the physical environment of the school in order to increase the extent to which disabled pupils are able to take advantage of education and associated services offered by the school; and
- improve the delivery to disabled pupils of information, which is already provided in writing to non-disabled pupils.

Accessibility plans must:

- be in writing;
- be within the resources that schools can afford;
- be subject to inspection by HMI/BSI; and
- cover a period of 3 years.

Further information is available in circular LEA/0168/2002 “Accessible Schools: Planning to increase access to schools for disabled pupils”. It is available on the DCSF website at <http://www.dcsf.gov.uk/sen> or by phoning DCSF Publications on 0845 6022260.’

More information can also be found at

<http://www.teachernet.gov.uk/wholeschool/disability/disabilityandthedda/>

### **8 k and l *Expectations of the school's faith association concerning welfare, health and safety***

The faith perspective should underpin all the school's policies and procedures. The school's policy and practice in behaviour and discipline should be grounded in its faith commitment.

#### **4. Suitability of staff, supply staff and proprietors**

The regulations governing suitability were amended by Statutory Instrument 2007/1087 which came into force on 1 May 2007. The amended regulations relate directly to statutory requirements in DCSF guidance *Safeguarding children and safer recruitment in education 2007* (see also regulation 3(2)(b)). The regulations state that 'staff' means those people working at the school, other than supply staff, whether under a contract of employment, under a contract for services or as volunteers. For further guidance, see BSI's *Step by step guide to fulfilling the requirements for suitability of staff, supply staff and proprietors in independent day schools in England*.

##### **8 m, n and o *Expectations of the school's faith association concerning suitability of staff***

Schools should be committed to employing staff from the faith community and helping them to grow in their faith and apply it in their work. The school should not only recruit teachers from the faith community but also offer professional development so that they can deepen and strengthen their faith perspective.

It is not expected that *all* teachers should come from the relevant faith community, but a substantial proportion should, since the school should be committed to employing teachers who provide the pupils with a role model as members of the faith community.

Prayer is an important part of the role model that the teachers should provide.

#### **5. The suitability of the premises and accommodation**

**5(g) *Is there sufficient access so that emergency evacuations can be accomplished safely for all pupils, including those with special needs?***

**5(h) *Is access to the school such that it allows all pupils, including those with special needs, to enter and leave the school in safety and comfort?***

These regulations apply only to the current school population. If there are no pupils on roll who have mobility problems or disabilities, then the school meets these regulations even if the access is currently restricted for such pupils. However, in this case, the proprietor's accessibility plan (see page 14) should consider how access is to be improved over time, as funding allows.

**5(j) *Having regard to the number, age and needs (including any special needs) of pupils, are classrooms appropriate in size to allow effective teaching and do all areas of the school not compromise health or safety?***

The judgement that needs to be made is whether there is adequate space for safe and effective teaching and learning, having regard to the subject being taught and the activities being undertaken as well as to the number, age and needs of pupils. A classroom that is so crowded that the teacher cannot move around it easily is not

going to be adequate even for the most sedentary activities. A science classroom that does not have enough space for experiments to be undertaken safely is inadequate in size. Where pupils do not have access to specialist accommodation, their classroom must be large enough to allow practical work to take place. As pupils grow older, the need for specialist accommodation increases if their curriculum is not to be restricted.

There are no set space allocations for pupils of statutory school age and beyond but as a minimum, each classroom will normally require around two square metres per pupil, and for some subjects more space will be needed. Pupils with special educational needs will often require additional space.

***5(m) Where food is prepared, are there adequate facilities for its hygienic preparation, serving and consumption?***

Any school in which food is prepared is open to inspection by the local Environmental Health Officer. Any recommendations made by an EHO should be implemented as soon as practicable. Any food preparation area should have a hand-wash basin separate from the sink, with hand drying facilities and soap.

***5(p) Are the lighting, heating and ventilation in the classrooms and other parts of the school satisfactory and in accordance with The Education (School Premises) Regulations 1999?***

The School Premises Regulations give precise requirements for these three aspects, but schools will not normally need to use specialist measuring equipment. They should first make a common-sense judgement as to whether the lighting is adequate, the heating is sufficient and not excessive and there is enough ventilation. If there are concerns, they may need to take some measurements to see whether the regulations are being met.

The requirements in the School Premises Regulations are as follows:

**Lighting:** the maintained illuminance of teaching accommodation shall be not less than 300 lux on the working plane and where visually demanding tasks are carried out, it should be not less than 500 lux; and the glare index shall be no more than 19.

**Heating:** sick rooms should be 21 °C; accommodation for teaching, private study and exams should be 18°C; spaces used for PE, washrooms, circulation spaces and sleeping accommodation should be 15°C.

**Ventilation:** all areas should have controllable ventilation at a minimum rate of 3 litres of fresh air per second per person; in teaching accommodation, sick rooms, sleeping and living accommodation the minimum rate should be 8 litres per second per person; washrooms should be capable of being ventilated at a rate of at least six air changes an hour; there should be adequate measures to prevent condensation and to remove noxious fumes.

**5(t) Are there appropriate arrangements for providing outside space for pupils to play safely?**

There should be enough space outside for recreational purposes, but it is reasonable to take account of the way in which this space is used in judging its adequacy. For example, if playtimes are so arranged that there are never more than thirty pupils outside at any one time, then a playground of around 300 square metres may be adequate even if the total number of pupils in the school is ninety. Usually, there should be at least 9 square metres of play space per pupil using it at any one time. For some schools in the middle of cities, it is also reasonable to take account of regular use of nearby parks, provided the journey to the park takes only a few minutes and pupils are properly supervised and safe at all times. Ideally, there should be both hard cover and grassed areas, but if there is only a grassed area that drains well and can be used all year round, this may be adequate. Similarly, if there is only a hard play area, but use is made of nearby sports fields, this could also be sufficient.

**8 p Expectation of the school's faith association concerning the premises and accommodation**

The expectation is that the displays around the school and the way that the building is used for worship and other activities should reflect the school's faith commitment.

## **6. The provision of information**

The regulations concerning the provision of information were amended by Statutory Instrument 2008/3253 which came into force on 9 February 2009, and should be fully implemented by schools by September 2009. For the most part, the amendments simplify the regulations, though a new duty is placed on schools relating to their safeguarding policies (see below). In the amended regulations, all the information in 6(2) must be provided for parents and would normally be included in the prospectus. The information in 6(3) must be made available to parents. The regulations give this definition:

'where a school is required to "make available" information or a document, the requirement is satisfied where—

- (a) the information or a copy of the document is published on the school's internet website, where such a website exists;
- (b) the information or a copy of the document is available for inspection on the school's premises during the school day; and
- (c) the school ensures that parents of pupils, and parents of prospective pupils who request it, are made aware that the information or document is published or available and the form in which it is published or available.'

However, there is some ambiguity in this definition since it is not clear whether schools with a web-site have to do (a) and (b) and (c), or only (a) and (c). The DCSF have given the following additional guidance to inspectors: 'There has been some uncertainty about the wording of the regulations and we have, therefore, decided that schools with websites may continue to either send parents a copy of information/documents on request or publish them on the school website. In

September 2010 the standards regulations will be revised to take account of the new management and leadership standards and some of the recommendations made in the Singleton report and we will take the opportunity of clearing the uncertainty in relation to making available information/documents at that time. In assessing compliance with the standards regulations inspectors should, therefore, ensure that schools with websites have informed parents of the information available and that it is made available either on the school website or by sending copies to parents on request.'

**3 (4) *If the school has a website, does it publish its safeguarding policy (see paragraph 3 (2)(b) of the Regulations) on it; or, if it has not got a website does it send a copy to parents and prospective parents on request?***

The school's written policy 'to safeguard and promote the welfare of children who are pupils at the school in compliance with the DCSF Guidance "Safeguarding children and safer recruitment in education 2007"' is treated differently in the Regulations from all other policies. If the school has a website, it must be published on it. If there is no website, then it is not sufficient just to make the policy available for inspection during the school day: it must be sent to any parent or prospective parent who requests it. For further guidance on the policy see pages 7 and 8.

**8 q, r, s t and u *Expectations of the school's faith association concerning the provision of information***

The expectations are that schools are open, honest and up-front about their faith commitment. They should work closely in partnership with parents, especially in matters of faith, encouragement and discipline.

**7. The effectiveness of the school's procedures for handling complaints**

Statutory Instrument 2008/3253 made some minor amendments to the Regulations in this section. Schools are now required not just to have a complaints procedure but to 'draw up and implement effectively a complaints procedure' which they make available to parents in the way described on page 18. Regulation 7 (i) is slightly different from before and 'provides for the panel to make findings and recommendations and stipulates that a copy of those findings and recommendations is—

- (i) sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about; and
- (ii) available for inspection on the school premises by the proprietor and the head teacher.'

**8 v *Expectation of the school's faith association concerning the handling of complaints***

The school is expected to approach the matter of parental complaints, to write its procedures and to put them into practice in a manner that demonstrates the faith values that underpin all aspects of the school's work.

## **APPENDIX: DOCUMENTS REQUIRED FOR A BSI INSPECTION**

These will normally include the documents listed below, but the list is not exhaustive. Schools may wish to provide further documents and lead inspectors may request further information. The principles should be:

- that the school makes available to inspectors any documents which are quoted in the SIEF as evidence that regulations are met
- that documents are not written specifically for the inspection, but are ones that the school uses in the normal course of its work
- that any requests by the lead inspector for further information are reasonable.

Some of the documents will refer to individual pupils and members of staff. Inspectors will, of course, respect the confidentiality of these documents and will not remove them from the place in which they are kept.

The following documents should normally be emailed to the lead inspector following discussion prior to the inspection:

- an up-to-date version of the SIEF, together with the supplementary SIEF for boarding, if the school has boarders, and for the early years foundation stage (EYFS), if the school has EYFS pupils
- timetables for each year group
- a staff list giving details of qualifications and responsibilities.

The following documents should normally be made available to inspectors during the inspection:

- the school's prospectus and/or handbooks for staff, pupils or parents
- a simple plan of the school buildings
- for each class, a list of pupils with their names and national curriculum year groups
- the curriculum policy statement and schemes of work for all subjects, as required by standard 1
- records of pupils' attainment and progress
- a summary of any examination or test results for the past three years
- if there are any pupils with special educational needs, records of the school's identification and support for them, including individual education plans
- for any pupil with a statement of special educational need, a copy of the statement and a record of annual reviews together with details of any funding by the local authority that maintains the statement
- if there are any pupils whose principal home language is not English, records of the school's identification and support for them, particularly those at an early stage of learning English
- the school policy documents required for standards 3 (on anti-bullying, safeguarding children, behaviour and first aid)
- the accident book and any other first aid records, including the certificates for staff who are qualified to administer first aid

- records of sanctions imposed upon pupils for serious disciplinary offences as required by standard 3
- details of the school's fire precautions, including records of fire drills held
- risk assessments undertaken to keep health and safety hazards to a minimum
- the admission register
- the daily attendance registers
- evidence relating to the school's compliance with the Disability Discrimination Act, including the school's accessibility plan
- the single central record (SCR) of checks made on staff for suitability, as required by standard 4
- access to confidential staff files, in order to verify the procedures used at the time of appointment
- evidence of the way that the school makes information available to parents and prospective parents as required by standard 6
- examples of reports to parents
- the school's policy for handling complaints as required by standard 7
- access to the records of any complaints.