

1 Thursday, 10 October 2019
 2 (10.00 am)
 3 THE CHAIR: Good morning, everyone. Welcome to Day 9 of
 4 this public hearing. Ms Scolding?
 5 MS SCOLDING: Good morning, chair and panel.
 6 We have two witnesses this morning,
 7 Ms Helen Humphreys and Ms Amanda Spielman.
 8 Chair and panel, they are found within bundle F,
 9 tab A/5, 5(i), 6, 7 and 7(i), plus there are three
 10 witness statements from Ms Spielman and, in fact, two
 11 witness statements from Ms Humphreys in your bundle.
 12 You should also have loose in front of you, chair
 13 and panel, a third witness statement of Helen Humphreys,
 14 bottom right-hand corner, OFS011756_001, with some
 15 attachments.
 16 So can I check to make sure you have all got those?
 17 Fine.
 18 So it is bundle F, as far as I can see, tab A/1, 5,
 19 5(i), 6, 7 and 7(i).
 20 I will try and remember to make sure to tell you
 21 which bit of which statement I am going through, but
 22 please forgive me, because we have got quite a large
 23 number.
 24 Usher, thank you.
 25

Page 1

1 in front of you. Behind the first bundle, behind
 2 tab A/1 and tab A/2, there are two witness statements
 3 from you. Can I ask you to confirm, again, that those
 4 witness statements are true, to the best of your
 5 knowledge and belief?
 6 MS HUMPHREYS: I can.
 7 MS SCOLDING: And that you signed both of them?
 8 MS HUMPHREYS: I did.
 9 MS SCOLDING: Then, with the third witness statement, which
 10 will be loose, can you again confirm that you signed
 11 this witness statement?
 12 MS HUMPHREYS: I did.
 13 MS SCOLDING: And that it is true, to the best of your
 14 knowledge and belief?
 15 MS HUMPHREYS: It is.
 16 MS SCOLDING: Mrs Spielman, we have three witness statements
 17 from you, one of which is dated 3 July 2019 and one on
 18 3 September -- I apologise, it is 8 July 2019,
 19 3 September 2019 and one on 24 September 2019, which are
 20 behind your tabs A, A(i) and (ii) of your paper bundle
 21 in front of you.
 22 Can I ask you to confirm that you have signed all
 23 those witness statements?
 24 MS SPIELMAN: I did.
 25 MS SCOLDING: And they are true, to the best of your

Page 3

1 MS AMANDA SPIELMAN (sworn)
 2 MS HELEN HUMPHREYS (sworn)
 3 Examination by MS SCOLDING
 4 MS SCOLDING: Good morning, both, and thank you very much
 5 for coming today. Ms Humphreys, thank you for agreeing
 6 to a second round, so to speak, of evidence. A few
 7 preliminary issues. Firstly, this is not a test of
 8 memory, we are going to be running over a lot of ground
 9 over the next few hours, so please feel free to refer to
 10 any notes you have or at any point to your witness
 11 statement.
 12 Secondly, we will be having a break at 11.15 for
 13 around 15 minutes, but if you need a break at any other
 14 time, please do let me know.
 15 Thirdly, you have written -- you have documentation
 16 in front of you, but I will also be getting most of the
 17 documents up on screen. Please let me know if you need
 18 those enlarged in any way or altered in any way.
 19 You are giving evidence together. I will try to
 20 address my questions to the person whom I think is the
 21 most relevant individual, but if the other wishes to
 22 contribute, or feels that they are the better person to
 23 deal with it, or both of you wish to contribute, please
 24 feel free to do so.
 25 Turning first to Ms Humphreys, there are two bundles

Page 2

1 knowledge and belief?
 2 MS SPIELMAN: They are.
 3 MS SCOLDING: Ms Spielman you are currently Her Majesty's
 4 Chief Inspector of Schools, which is a statutory role.
 5 How long have you held that post?
 6 MS SPIELMAN: Can I just correct, since you have quoted my
 7 full title? I am Her Majesty's Chief Inspector of
 8 Education, Children's Services and Skills -- it is wider
 9 than schools -- and I have held the post since
 10 1 January 2017.
 11 MS SCOLDING: Right. What does that post entail?
 12 MS SPIELMAN: The post entails responsibility for our
 13 inspection and regulation work across four remits,
 14 broadly four remits: early years; schools; post 16; and
 15 children's social care.
 16 MS SCOLDING: Prior to that, did you have experience in
 17 running managing or inspecting schools or children's
 18 services?
 19 MS SPIELMAN: Yes, I've worked in education since 2004, and
 20 been studying education, doing some freelance work
 21 before that. I was one of the founding management team
 22 of one of what is now one of the largest chains of
 23 academy schools and, in my time there, I was responsible
 24 actually for the development of all our policy -- our
 25 policies as a group of schools. So I have been involved

Page 4

1 not just in education, but also in school responsibility
 2 for safeguarding for getting on for 15 years.
 3 MS SCOLDING: Ms Humphreys, we obviously heard your
 4 experience on the previous occasion, so I will not ask
 5 you to repeat it.
 6 It is also the case that, with a large amount of the
 7 material you talk to within your witness statement,
 8 a lot of it is within what is called the corporate
 9 memory of your organisation, rather than from personal
 10 recollection; that's right, isn't it?
 11 MS SPIELMAN: It is.
 12 MS SCOLDING: So what I am going to try and do is first
 13 speak specifically about the inspection of special
 14 schools, then I am going to ask about the inspections in
 15 respect of Stanbridge Earls School, and then I am going
 16 to ask about the inspection in respect of Chelfham Mills
 17 School, then I am going to ask about Stony Dean, then
 18 I am going to ask about the Royal School Manchester,
 19 then I am going to ask about some general issues about
 20 schools, but throughout that, where there are points
 21 which are of more general application rather than
 22 idiosyncratic to the school, I will ask you,
 23 Ms Spielman, to make general comments as we go through.
 24 So, turning first, I think largely it is
 25 Ms Humphreys who is going to be dealing with the detail

Page 5

1 even less prescriptive, and with very little difference
 2 between the boarding school standards and the
 3 residential special school standards.
 4 MS SCOLDING: Right. Do you think slimmer is better?
 5 MS HUMPHREYS: Not necessarily. It depends what those
 6 standards include. So it doesn't necessarily mean that
 7 we have to have lots of standards, what we need is
 8 outcome-focused standards that inform the schools why
 9 they have to do something, and also include words of
 10 description really, which the current standards don't
 11 include.
 12 So the standards would say that something has to be
 13 in place, but it doesn't say that it has to be effective
 14 or efficient or comprehensive. Those are the words that
 15 are missing which make it difficult when you are
 16 inspecting and you find there is something not right,
 17 a school is doing something they shouldn't be doing or
 18 they are not doing something that they should be doing.
 19 Our remedy is to go to the national minimum standards
 20 and find a standard that can say to the school, "You are
 21 not doing this" and, actually, that can be quite
 22 challenging if they are doing something but they are not
 23 actually doing it very well or very effectively.
 24 MS SCOLDING: Right, so you -- I think to summarise, you
 25 consider that the standards don't focus enough upon

Page 7

1 of this, as we know, special schools are inspected. If
 2 they are independent, they will be inspected against the
 3 independent special school -- the independent school
 4 standards, but they will also be inspected against the
 5 national minimum standards, which are introduced under
 6 the Children Act 1989, and it is largely those
 7 standards, the national minimum standards, that we will
 8 be focusing on today.
 9 As I understand it, those standards were first
 10 introduced in 2002. Then they were amended in 2011,
 11 2013, and 2015. Is that right, Ms Humphreys?
 12 MS HUMPHREYS: Yes.
 13 MS SCOLDING: Have they become more or less rigorous over
 14 time, do you think?
 15 MS HUMPHREYS: So the 2002 NMS, as has been said previously,
 16 there was over 50, it was a large document and they were
 17 very prescriptive and included a whole range of matters,
 18 including premises, size of things, how many staff had
 19 to be employed, they were very prescriptive.
 20 The second publication of the NMS were a much
 21 slimmed-down version and separated out for the first
 22 time residential special schools and boarding schools,
 23 so there were two different sets.
 24 The latest version, the version that we currently
 25 use, in 2015, was an even more slimmed-down version,

Page 6

1 quality, so to speak?
 2 MS HUMPHREYS: Absolutely, and they are not aspirational,
 3 they are not outcome-focused. It doesn't tell the
 4 school why they have to do something in order to improve
 5 the quality of care that the child is receiving.
 6 MS SCOLDING: Are you therefore in agreement -- we have had
 7 a number of people come to give evidence, all of whom
 8 have said, "We think, particularly for the special
 9 school sector, and in particular for the residential
 10 special school sector" -- to whom the NMS obviously
 11 apply; they don't apply to day schools -- "that there
 12 should be something that looks more like the Children's
 13 Home Regulations".
 14 MS HUMPHREYS: Absolutely, because our view is, and
 15 particularly with residential special school, a child
 16 with complex needs could be living in a children's home,
 17 they could be going and attending a short-break setting
 18 or experience and they could be in a residential special
 19 school, the needs of those children could be almost the
 20 same, but they are subject to different inspection
 21 regimes.
 22 MS SCOLDING: Right. Ms Spielman, do you have anything you
 23 wish to add to that?
 24 MS SPIELMAN: Yes, just to say that for several years now,
 25 since we brought in the social care common inspection

Page 8

<p>1 framework, precisely to address this kind of problem as 2 far as we can, to bring common standards -- 3 MS SCOLDING: Can you just tell us a little bit about the 4 social care inspection framework and how it introduces 5 a quality standard? 6 MS SPIELMAN: It is an inspection framework parallel to our 7 education inspection framework which is, it is holistic, 8 it looks at all aspects of a provider, it applies -- it 9 applies in different contexts, in children's homes but 10 in many other contexts, but it draws together that 11 concept of -- firstly, it relies on quality and, 12 secondly, it brings the same standard, expectation 13 standard, as far as we can within the law, across all 14 types of provision. 15 If it is a child being looked after, by whomever, 16 they should have the same standard of care. So to the 17 extent that we can, it brings, and means we can report 18 on, quality, but as Helen says, it doesn't give us 19 a remedy where people fall short on something, if the 20 NMS is not triggered. 21 MS SCOLDING: Right. 22 MS HUMPHREYS: It sets out what "good" looks like; that is 23 our starting point. 24 MS SCOLDING: I think what you are trying to say is that 25 should be then reflected in the law, that you are</p> <p style="text-align: center;">Page 9</p>	<p>1 bumping up against the law, so the law should reflect 2 what "good" looks like? 3 MS SPIELMAN: Yes. And we are -- in parts of the education 4 sector, there might be an argument that simply reporting 5 that something required improvement was sufficient to 6 put pressure on people, to bring their practice up. The 7 visibility, the reputation -- in a small and relatively 8 closed world, where there is great need for the 9 placements, there may be less effect simply of having 10 a mediocre or poor quality judgment, when the need for 11 placements for those children is still there. 12 MS SCOLDING: Demand far outstrips supply in this sector 13 and, therefore, even if schools are failing, shall we 14 say, or not meeting quality standards, that would not 15 necessarily lead to them closing in a way that might be 16 the case for other aspects of the independent sector. 17 MS HUMPHREYS: Indeed, children can be living in inadequate 18 settings. Settings that we have judged inadequate, 19 children may remain. 20 MS SCOLDING: I think Ms Povey, in particular, was concerned 21 that one of the standards, standard 11 was just kind of 22 too broad and took you to the Keeping Children Safe in 23 Education and Working Together and that that was too -- 24 it was too vague, I think, a particular standard -- 25 MS HUMPHREYS: That's right. NMS 11 requires the school to</p> <p style="text-align: center;">Page 10</p>
<p>1 have a policy and comply with statutory guidance and 2 that is the child protection standard within the NMS. 3 MS SCOLDING: Yes. Now, do you have anything, the 4 Independent Schools Inspectorate have brought something 5 to our attention which they use in respect of providing 6 some assistance for schools called the "inspection 7 commentary". 8 Ralph, it is ISI001598_004. Sorry, it has only just 9 been put on the system, so ... 10 That explains what it is at paragraph 2. It is 11 a sort of commentary which basically sets out the 12 various legal requirements and then explains the 13 standards to support consistency across inspections, 14 carefully saying that definitive guidance can only be 15 provided by a court of law. 16 Can I then take you to what they do in respect of 17 welfare, health and safety of pupils. Can I take you to 18 31. 19 MS SPIELMAN: Paragraph 31 or page 31? 20 MS SCOLDING: Don't worry, it is up on screen, Ms Spielman, 21 if you will find that more useful and if you look here, 22 "Safeguarding policy content" at paragraph 159. Ralph, 23 would you mind expanding that? You are probably both 24 better off, Ms Humphreys and Ms Spielman, not reading it 25 from the screen, but reading it from the page, because</p> <p style="text-align: center;">Page 11</p>	<p>1 it's slightly -- that sets out, for example, explicitly, 2 what is to be expected. And then, just to give another 3 example, in respect of training, can we go to 4 paragraph -- page 37, paragraph 197. 5 MS HUMPHREYS: Yes. 6 MS SCOLDING: That sets out again, in a fairly extensive and 7 prescriptive manner, what the inspectors are looking for 8 and what the requirements are. 9 Do you have something that looks like this? 10 Because, obviously, we have seen your social care 11 inspection frameworks and they say: this is what "good" 12 looks like, this is what "outstanding" looks like. We 13 have seen your safeguarding, sort of, all areas 14 inspection guidance, but there is not anything which is 15 quite as, kind of, nuts-and-bolts and process-driven as 16 this is. Do you do anything like this? 17 MS HUMPHREYS: We don't have -- we have only just seen this 18 document, so we have not had time to peruse it in 19 detail. 20 MS SCOLDING: Of course. I completely understand that and, 21 if you wish to comment on it further and in more detail, 22 then that is absolutely fine. 23 MS HUMPHREYS: We may consider that. We don't have 24 something that is as prescriptive as this, and our 25 social care common inspection framework, as has been</p> <p style="text-align: center;">Page 12</p>

<p>1 said, does set out what we expect from providers. The 2 evaluation schedule is very clear in terms of what -- 3 the outcome of what a school should do. We don't have 4 a document that is similar to this. We also see that 5 there a role for the DfE to provide guidance and we 6 would expect schools to be following Keeping Children 7 Safe, Working Together and other related guidance that 8 the DfE provides.</p> <p>9 MS SCOLDING: Do you have any particular views, as Ofsted, 10 about how helpful the current Keeping Children Safe in 11 Education and Working Together is, particularly for the 12 residential special school sector?</p> <p>13 MS HUMPHREYS: So the advent of the Keeping Children Safe in 14 Education document was quite a moment, really, because, 15 for the first time, it put into one document what was 16 expected of schools, and it was extremely clear. And 17 that has got better as we have had more -- as we have 18 had more publications. I think it has been said before 19 that it is limited in terms of children with special 20 needs, with disabled children, and that has already been 21 said during the tribunal.</p> <p>22 We would share some of those concerns. Not that we 23 need masses of guidance, we don't particularly subscribe 24 that you have to have reams of it, because that is 25 difficult for schools to contain, but I think there</p> <p style="text-align: center;">Page 13</p>	<p>1 needs to be some recognition that the range of children 2 in special schools is different and diverse.</p> <p>3 MS SCOLDING: Ms Spielman, do you have anything to add to 4 that?</p> <p>5 MS SPIELMAN: Yes. It is a good example of this trade-off 6 that we all constantly struggle with, of balancing 7 a sufficient degree of specificity with something that 8 is manageable in the hands of averagely competent people 9 in schools and children's homes.</p> <p>10 Our approach tries to put a lot of emphasis on: are 11 the policies/rules/laws, translating in a sensible way; 12 are they actually living in the institution; do people 13 have the understanding at the right level; do they 14 discuss; do they raise concerns early enough?</p> <p>15 Whatever the model is, must translate and, our 16 inspection model, we have learnt not to put too much of 17 our effort into the documentary compliance, but to put 18 a lot of emphasis on to what it is actually translating 19 to among the individuals who work with it.</p> <p>20 MS SCOLDING: But can I just double check, in terms of any 21 inspection you would undertake under the national 22 minimum standards, whether they are the residential 23 special school or the other sort of school, would there 24 be a checklist for inspectors of what is to be expected 25 in terms of documentary compliance?</p> <p style="text-align: center;">Page 14</p>
<p>1 MS HUMPHREYS: So that would be whatever is in the national 2 minimum standard. We couldn't expect a school to have 3 more than is required by legislation or by the national 4 minimum standard.</p> <p>5 MS SCOLDING: Thank you.</p> <p>6 MS HUMPHREYS: If schools choose to do additional policies 7 or documents, we would look at that and -- because what 8 we would be wanting to look at is, what is the impact? 9 So, as has been said before, you can have the most 10 beautifully-crafted policy, but if it sits in a cupboard 11 and nobody reads it, or nobody follows it, then it is 12 worthless, and we are more interested in the impact and 13 practice, unless -- that doesn't mean to say we don't 14 look at those things, but we would be less interested in 15 a beautifully-crafted policy.</p> <p>16 MS SCOLDING: Right.</p> <p>17 I am not sure, Ms Humphreys, in fact, you answered 18 the question, which was: is there a checklist for 19 inspectors that gets sent out with them, or a code or 20 something, saying "You have to look for this, this, this 21 and this"?</p> <p>22 MS HUMPHREYS: Yes, and it is in a social care common 23 inspection framework. It sets out what a school -- what 24 the inspector will expect the school to provide. We 25 also have another document called annex A which sets out</p> <p style="text-align: center;">Page 15</p>	<p>1 another list of things that the school is supposed to 2 supply from something like the gas safety certificate to 3 the recruitment and selection files and all sorts of 4 other pieces of information.</p> <p>5 MS SCOLDING: Okay. Can I just double check as well, if 6 a school is a registered special school and a children's 7 home -- and we had an example of that yesterday, where 8 they were a registered special school but were also 9 registered as a children's home -- then there would be 10 two sets of inspections, wouldn't there? You would have 11 the Ofsted, Ofsted would go in and look at the education 12 side of it and then Ofsted would go in and look at the 13 children's home side of it.</p> <p>14 Does that make any sense? Shouldn't there just be 15 one set of inspections? Because, in most of these cases 16 to do with residential special schools, everyone in the 17 children's home is likely to be going to the school.</p> <p>18 MS HUMPHREYS: Not always. We have done some work recently 19 on this, and there are lots of different arrangements up 20 and down the country. We have -- in some situations, we 21 have an unmaintained special school, day school, that 22 takes children from the community and/or close by, and 23 then we might have a small registered children's home 24 for, say, six children, and those six children may 25 attend that school, but they are attending that school</p> <p style="text-align: center;">Page 16</p>

1 along with all the other children -- all other children.
 2 MS SCOLDING: Yes.
 3 MS HUMPHREYS: We then have residential special schools that
 4 are also registered as a children's home and only a very
 5 small number of the children that live in the children's
 6 home go to the residential special school.
 7 MS SCOLDING: Okay.
 8 MS HUMPHREYS: I could talk for hours in terms of the
 9 different complexities, but they are there.
 10 MS SCOLDING: So it is a very variable sector --
 11 MS HUMPHREYS: It's a very variable sector.
 12 MS SCOLDING: -- in terms of where children are living and
 13 where they are going to school?
 14 MS HUMPHREYS: Where they are going to school, absolutely.
 15 MS SCOLDING: But do you think it would be sensible, in
 16 effect, if there was some kind of merging of what has to
 17 happen with children's homes and what has to happen with
 18 the NMS in residential special schools so that they
 19 looked similar --
 20 MS HUMPHREYS: Yes, I think that would be really helpful.
 21 MS SCOLDING: -- or were the same?
 22 MS HUMPHREYS: It would be really helpful and I think --
 23 I mean, the requirement of a residential special school
 24 to register as a children's home is embedded in the Care
 25 Standards Act, which is, as we know, now a dated piece

Page 17

1 MS SCOLDING: One of the things that follows up from that
 2 is, if you are going to have something that looks a bit
 3 more like the way that children's homes are run, does
 4 there need to be some kind of -- at the moment, there is
 5 no specific qualification or requirement for somebody
 6 who is the head of a boarding in a residential special
 7 school, to have -- to be a registered person, to have
 8 all the accoutrements that come with that, all the
 9 additional responsibilities and qualifications. Do you
 10 think that that is something which should be introduced
 11 in the residential special schools sector?
 12 MS HUMPHREYS: Yes, because, by regulation, a manager of
 13 a children's home -- and that might be a children's home
 14 that accommodates children with very complex needs --
 15 needs to have a recognised qualification, they need to
 16 have extensive experience and be able to demonstrate
 17 through interview with us, known as a "fit person
 18 interview", that they are competent in order to be
 19 registered to manage that children's home.
 20 Equally, next door, you could have a residential
 21 special school, accommodating children with very similar
 22 needs and the head of boarding is appointed and, whilst
 23 the national minimum standard says they should have
 24 a qualification, it is a national minimum standard, it
 25 is not by regulation. It is not enforceable.

Page 19

1 of legislation. The landscape when that was written in
 2 2000 is very different to the landscape that it is now.
 3 MS SCOLDING: What's different about the landscape?
 4 MS HUMPHREYS: The complexity of children's needs. So
 5 children who were going to residential special schools
 6 in 2000 were not necessarily the same children who are
 7 going to residential special schools now.
 8 A lot of children in those days, in 2000, will
 9 probably be managed in maintained schools now. They
 10 don't necessarily need to go to residential special
 11 schools, so we are left largely, but not entirely, with
 12 residential special schools that accommodate children
 13 with the very complex needs. These are children without
 14 ability, without communication, who need adults for all
 15 levels of their care.
 16 An awful lot of children with autism or on the
 17 autistic spectrum, and then we have a small number of
 18 residential special schools, and these are reducing in
 19 number, of children with emotional and social
 20 complexities as well.
 21 MS SCOLDING: I think Dame Christine Lenehan identified in
 22 her review that there has been a halving of the sector,
 23 even since 2010, and probably a significant reduction
 24 from that between 2000 and 2010 --
 25 MS HUMPHREYS: That's right, absolutely.

Page 18

1 MS SCOLDING: Just to sort of clarify, this is for a very
 2 small number of students and also for a very small
 3 number of schools. I think the National Association of
 4 Special Schools tells us they only have 136 residential
 5 schools and I think you say that you have got 131,
 6 I think you --
 7 MS HUMPHREYS: Yes, probably. I mean, the -- I know I was
 8 notified by a colleague in the south-east that they have
 9 experienced the closure of five residential special
 10 schools since -- in this year. So, yes, the sector is
 11 diminishing.
 12 MS SCOLDING: Right, okay. As I understand it, particularly
 13 in respect of this aspect of work, following on from
 14 Dame Christine Lenehan's review, she undertook some work
 15 with you as Ofsted. I just wanted to have a quick look
 16 at that and what you have done in response to her
 17 proposals.
 18 Ralph, would you mind getting up her note, which is
 19 her review OFS011753_002. Chair and panel, it should be
 20 directly behind the third witness statement of
 21 Helen Humphreys, if you would prefer to see it on paper
 22 rather than on screen. As if by magic.
 23 Can I just ask a little bit about, was this
 24 something that Dame Christine asked to do or was this
 25 something you asked Dame Christine to do?

Page 20

<p>1 MS HUMPHREYS: Okay, so prior to the Lenehan Review, we had 2 been reviewing the quality and -- the quality of our 3 residential special school inspections to ensure that we 4 were getting it right. It didn't mean to say we didn't 5 think we weren't getting it right, but we wanted to be 6 confident that we were getting it right. 7 As part of the Lenehan Review, Dame Christine asked 8 to see us and we went to see her as part of her research 9 for the review. On the back of that, once she published 10 her report, we invited her and commissioned her to do 11 a piece of work with us, which was to ask for her advice 12 in terms of, were we getting our inspections of 13 residential special schools right, in her opinion. 14 She did that by reviewing a number of our reports, 15 by reviewing our inspection framework, and then she went 16 out on an inspection which is what she referred to in 17 her evidence to shadow a residential special school 18 inspection. 19 MS SCOLDING: Okay. I think can we go to page 5, which is 20 her report, please. 21 These were her introductions and her key 22 recommendation is that the NMS are no longer fit for 23 purpose, which is something we have heard about from her 24 and now also from you. 25 MS HUMPHREYS: That's right, and of course it is not in our</p> <p style="text-align: center;">Page 21</p>	<p>1 gift to amend those. 2 MS SCOLDING: Yes. What she then says, at the bottom of the 3 page, which she has also said to us, is, what became 4 clear from reading them is that Ofsted can only inspect 5 what is in front of it, so cannot impact -- inspect, 6 sorry, within context or outside of its framework: 7 "This comes out in key issues such as leadership and 8 workforce, where inspectors can only comment on the 9 consequences for children and there is no contextual 10 information." 11 Is that a concern that you share, is that 12 a difficulty that you have identified? 13 MS HUMPHREYS: Yes, because we are restricted by the 14 national minimum standards. 15 MS SCOLDING: Okay. 16 And then, if one goes to the next page, "Learning 17 from inspection", please, Ralph, she recommends the need 18 for two inspectors at all times. Now, you have not, in 19 fact, implemented that recommendation, but she says they 20 were -- she was very impressed by their depth of 21 knowledge and their calm, but authoritative, approach. 22 She said: 23 "I had not understood how intense and thorough the 24 experience would be and now understand why school and 25 residential inspections tend to be separate. It is</p> <p style="text-align: center;">Page 22</p>
<p>1 clear there needed to be two inspectors, because the 2 level of work ... differing skill set ..." 3 She also said she was, "very impressed by the 4 inspectors' ability to relate directly to children and 5 young people with profound and complex needs. They 6 spent meaningful time with them and I would want to be 7 confident that this level of disability skill was common 8 amongst inspectors." 9 And she said she was very happy to agree with that. 10 Now, why have you not decided to implement the two 11 inspectors recommendation? 12 MS HUMPHREYS: We don't actually say anywhere how many 13 inspectors will ever be on an inspection. That is 14 a decision that is taken by the region, locally, based 15 on the size of the school, the complexity of the needs 16 of the children that are there, the geography of the 17 school, because, for some schools, they are on very, 18 very large sites, sometimes the boarding accommodation 19 is 20 minutes away from the actual school grounds. 20 Sometimes there are particular issues that we need 21 to look at, in which case the inspection team could be 22 as many as four inspectors, but equally, we have 23 a very -- we have a significant number of very small 24 schools. We have some residential special schools that 25 perhaps might only have ten boarders. I was on</p> <p style="text-align: center;">Page 23</p>	<p>1 an inspection in July where there were four boarders. 2 It was not necessary to have two inspectors on 3 a school of that size. 4 MS SCOLDING: And then, what she also says on the next page, 5 is the significant issue within this inspection was the 6 role of health. You have described, and so did 7 Dame Christine describe, the fact that children who tend 8 to be in these settings have significant health needs, 9 whether that is what we would call physical health needs 10 or, in fact, mental health needs as well. 11 Have you done any work with whether or not the CQC 12 should be involved with looking at the health aspects of 13 the provision that is made and do you have any views 14 about that? 15 MS HUMPHREYS: Okay, so there are a small number of 16 children's homes -- 17 MS SCOLDING: And special schools. 18 MS HUMPHREYS: Yes, I think it is in the region of about 27, 19 that are also registered with CQC. 20 MS SCOLDING: Right. 21 MS HUMPHREYS: So we have joint arrangements for the 22 inspection of those settings, which sometimes means CQC 23 come with us or sometimes they inspect at a separate 24 time, because it all depends on what the role of CQC is, 25 but we have lots of sharing of information and we have</p> <p style="text-align: center;">Page 24</p>

<p>1 an active working group with the CQC and, again, share 2 expertise and are looking to -- well, we have got joint 3 guidance and we are looking to develop joint protocols 4 and some joint training events with CQC. 5 On the back of this, as well, we have launched and 6 delivered a whole programme of training for our 7 inspectors on the emotion, health and wellbeing of 8 children, focusing particularly on mental health. 9 That's a day-long course that all our inspectors are 10 required to attend, again to pick up some of the mental 11 health issues within schools. 12 MS SCOLDING: Because I can imagine the CQC registration of 13 the institutions you talk about are largely going to be 14 to do with physical health because they are largely 15 going to be to do with situations in which intimate care 16 is provided or there is the provision of nursing care, 17 in effect. 18 MS HUMPHREYS: It is the provision of nursing care, it is 19 the type of care that children need that can only be 20 delivered by a nurse and, where the care can only be 21 delivered by a nurse, then that part has to be 22 registered with CQC. 23 MS SCOLDING: So that is going to be a relatively -- even 24 within the context of the complexity of need that we are 25 looking at, that is going to be a relatively small and</p> <p style="text-align: center;">Page 25</p>	<p>1 quite discrete number. 2 MS HUMPHREYS: It is and that is why it is not necessary, so 3 the answer could be, well, in these sorts of settings, 4 CQC should inspect alongside us, but, actually, they may 5 only be looking at a very discrete part of the care that 6 is being provided and there is nothing really to be 7 added. 8 MS SCOLDING: I am thinking in particular about schools and 9 organisations where there might be psychiatric 10 assistance, clinical psychological assistance, speech 11 and language therapy, occupational therapy. Those 12 things are much more routine across the piece within the 13 residential special school sector, so there is currently 14 no sort of clinical oversight of those by the CQC, as 15 far as I am aware. 16 MS HUMPHREYS: Unless they are registered with them. 17 MS SCOLDING: Yes. 18 MS HUMPHREYS: But we have got a system now that if 19 an inspector came across something they were not too 20 sure about, then we have a hotline into CQC to gain some 21 advice. Often we can get that advice while the 22 inspector is already out there and, also, if our 23 inspectors come across something that they start to 24 think that, "Actually, I think CQC need to look at 25 this", then we will refer into CQC for their children's</p> <p style="text-align: center;">Page 26</p>
<p>1 team to go out and have a look at, and that has happened 2 a few times. 3 MS SPIELMAN: If I may add one thing here, excuse me, our 4 joint work with CQC at the level of area rather than 5 individual institutions also helps. It helps us to 6 identify -- to look at children with complex needs 7 across both education and health. 8 MS SCOLDING: Because they are likely -- those institutions 9 registered with the CQC, they are likely to have 10 children who may well be looked after or will have 11 a significant involvement with children's social care 12 and a CCG in any event. 13 MS HUMPHREYS: Yes. So we have a very close working 14 relationship with them and CQC inspectors join our 15 inspections of secure settings as well. 16 MS SCOLDING: As a result of Dame Christine's review, you 17 undertook some proposals. Can I, Ms Humphreys, just 18 take you to those. I believe it was you who provided 19 this document. That is OFS011754_002. Chair and panel, 20 it is the next exhibit along in your paper bundle, if 21 you would rather look at it on paper rather than on 22 screen. 23 So this is -- and my heart sings, but everyone 24 else's heart in the room may fall, at the words "Task 25 and finish group" which heads this particular document.</p> <p style="text-align: center;">Page 27</p>	<p>1 Next page please, Ralph: 2 "The social care remit group agreed that a task and 3 finish group would be established to take forward the 4 proposals following the Lenehan Review." 5 So can you tell me, firstly, your first task was in 6 fact to establish an accurate list of schools and 7 schools which are also registered as children's homes 8 and specify the needs of children they care for. 9 Isn't that something which should have already been 10 done? 11 MS HUMPHREYS: This sings to the thing I have already spoken 12 about, which was the diversity. We wanted to check, 13 because what we sometimes come across is that the school 14 has a website which says that they undertake -- they 15 provide care or education to a range of children with 16 specific needs. That might not be the same as is 17 registered with the DfE and might not be what is 18 contained within the statement of purpose. 19 MS SCOLDING: Well, I mean, the school we are going to come 20 on to, Stanbridge Earls, is perhaps an example of 21 that -- 22 MS HUMPHREYS: Yes. 23 MS SCOLDING: -- in that there was lots of confusion about 24 what it was registered as and whether it was a special 25 school or whether it was not a special school, and that</p> <p style="text-align: center;">Page 28</p>

<p>1 fed into some of the confusion that we will come on to. 2 So, specifically, I will ask you some questions about 3 that, because then there were difficulties about which 4 box it fell into; that is right, isn't it? 5 MS HUMPHREYS: That's right, and we needed to be sure that 6 we were deploying inspectors with the skills required to 7 be able to communicate with the children, to have the 8 knowledge base, so one of the things that has happened 9 a lot is that more schools are taking children with 10 autism and so we need to ensure that we have got 11 inspectors who have knowledge and specialism to be able 12 to review care to autistic children. 13 MS SCOLDING: Are you therefore saying it may well have been 14 before this review that you would have had inspectors 15 who would have been inspecting those settings who might 16 not have had the right level of expertise? 17 MS HUMPHREYS: Not necessarily, we just wanted to get better 18 at it and we wanted to be confident and to assure 19 ourselves that we were doing the right -- the best that 20 we could. 21 MS SCOLDING: I understand you have done that in some part, 22 if one looks to page 3, that you have identified the 23 minimum skills and experience, and we have got a handy 24 table which, basically, you have split the schools into 25 three groups --</p> <p style="text-align: center;">Page 29</p>	<p>1 MS HUMPHREYS: Yes. 2 MS SCOLDING: -- sort of ranging in complexity, with group 3 3 being the most complex, and you have set out, really, 4 a minimum level of experience or training or 5 observational skills and abilities. 6 How do you test those, how do you ensure your 7 inspectors meet that? 8 MS HUMPHREYS: That is down to the regional managers, what 9 we call our regulatory inspection managers to ensure our 10 inspectors have got these skills. It was really setting 11 it out, what was required. 12 And also, then, for the regions to identify where 13 there were specific learning needs and -- because this 14 has been accompanied by a very thorough and extensive 15 training programme, which we are two-thirds of the way 16 through. 17 MS SCOLDING: Yes, I think we see that you have, at 5, over 18 to 6, there are various training programmes which were 19 identified, school-specific training. Could we go to 20 page 5, please, Ralph, the previous page: 21 "School-specific training to include ..." 22 Then there is a whole long list of things. 23 MS HUMPHREYS: Yes. 24 MS SCOLDING: So that work -- has all that work been carried 25 through? Has the task and finish group finished its</p> <p style="text-align: center;">Page 30</p>
<p>1 task and finish tasks? 2 MS HUMPHREYS: The task and finish group has finished, yes 3 and we have two more of the training events to take 4 place -- one next week, in fact, and one in a few weeks' 5 time -- and we have drawn on experts from the field as 6 well. The National Association of Special Schools and 7 Boarding Schools' Association have been key speakers at 8 these training events. And then we might unearth the 9 task and finish group to review the effectiveness and 10 then think about next steps, yes. 11 MS SCOLDING: Thank you. Can I now move on to some specific 12 schools and some issues there have been in the past that 13 I would like to take you through. 14 The first one of those is Stanbridge Earls School. 15 So just to recap, this was a school where there was, 16 firstly, confusion about the type of school it was. 17 MS HUMPHREYS: Yes. 18 MS SCOLDING: There were then serious safeguarding concerns 19 which were raised in 2011, both with you and with 20 a number of other agencies, but it was only really in 21 2013, following a Special Needs Tribunal decision which 22 found that the school had been culpable in respect of 23 disability discrimination, that I would describe the 24 troops went in, so to speak, and there was a -- there 25 were so many agencies then involved and there was then</p> <p style="text-align: center;">Page 31</p>	<p>1 a Serious Case Review which identified difficulties in 2 a number of areas and with a number of partners. 3 I think the issue, really, that I want to explore 4 with you is how effective inspection can be in getting 5 underneath the problems that might be going on at 6 a school -- particularly in respect of sexual abuse. 7 But, before I do that, there is this first issue 8 which was what sort of school it was. 9 Now, this is the -- this is, to me, the highly 10 interesting legal bit, but which the two of you might 11 find less interesting, there is no longer a definition 12 of what is an independent special school. 13 MS HUMPHREYS: That's right. 14 MS SCOLDING: There was a definition under the 15 Education Act 1996, and that was then repealed but it 16 has not been replaced. The Children and Families Act 17 2014 has not replaced it. So how easy is it for you to 18 identify whether something is an independent special 19 school or just an independent school? 20 MS HUMPHREYS: So we look to the DfE to make the 21 categorisation in terms of residential special school. 22 Stanbridge Earls was always a residential special 23 school. But they describe themselves as a special 24 boarding school. 25 MS SCOLDING: Wasn't it specialist? Sorry, Ms Humphreys</p> <p style="text-align: center;">Page 32</p>

1 just to correct you.
 2 MS HUMPHREYS: Possibly, it --
 3 MS SCOLDING: I think they describe themselves, instead of
 4 a special boarding school, as a specialist boarding
 5 school. Does that actually exist?
 6 MS HUMPHREYS: No.
 7 MS SCOLDING: So they should -- or were they always
 8 inspected against the residential special school
 9 standards as opposed to --
 10 MS HUMPHREYS: No, so initially, we can find no record that
 11 the school was inspected at all under NCSC. There were
 12 a number of schools, around that time when NCSC was
 13 created and the national minimum standard -- the first
 14 lot of national minimum standards were written, who
 15 disputed as to which standards they
 16 should be inspected against, and Stanbridge Earls, from
 17 my research, seemed to fall into that category.
 18 So we can find no record that they were, in fact,
 19 inspected at all by NCSC.
 20 Under CSCI, they appear to have been inspected under
 21 the boarding school standards and that seemed to --
 22 MS SCOLDING: So not the special school standards?
 23 MS HUMPHREYS: Not the special school standards, yes.
 24 MS SCOLDING: So there appears to have been, certainly at
 25 that particular period in time, which, just to remind

Page 33

1 always been, a residential special school.
 2 MS SCOLDING: Okay, so that was obviously an error on
 3 everyone's part.
 4 MS HUMPHREYS: Yes, and I think that built up from NCSC days
 5 and possibly even the local authority. I mean, it was
 6 an inherent problem.
 7 MS SCOLDING: Can I invite you to -- a short break, yes, of
 8 course. How long do we need?
 9 THE CHAIR: We will return at 11.00.
 10 (10.45 am)
 11 (A short break)
 12 (11.00 am)
 13 MS SCOLDING: Thank you very much, so just before the break,
 14 we were discussing the somewhat unusual nature of the
 15 fact that the school was, in fact, inspected against
 16 the, what I am going to call the ordinary --
 17 MS HUMPHREYS: The boarding school standards.
 18 MS SCOLDING: Rather than the residential special school
 19 standards.
 20 MS HUMPHREYS: Up until 2010.
 21 MS SCOLDING: Do you think that would have made any
 22 difference in terms of identifying some of the problems
 23 which later emerged? I am particularly thinking about
 24 bullying, where you have got children with
 25 high-functioning autism, who may well present quite well

Page 35

1 everybody, was kind of 2002 to 2008, some confusion
 2 about this school and it is likely not to have been the
 3 only school, where the nature of -- just to remind
 4 everybody, the children at Stanbridge Earls, certainly
 5 it took mainly children who had specific learning
 6 difficulties, that would be dyslexia and dyspraxia, and
 7 maybe found it difficult to cope within a mainstream
 8 setting. It was those sorts of children that tended to
 9 go there; that is right, isn't it?
 10 MS HUMPHREYS: Yes, largely fee paying.
 11 So the school had, to all intents and purposes --
 12 from looking into it, it had -- it looked like
 13 a boarding school, it sounded like a boarding school.
 14 The boarding school language was used. The activities
 15 that children did, presented like a boarding school.
 16 And one of the key things for our training is always
 17 what does the school -- what is the school registered
 18 at, but what does the school think it is?
 19 MS SCOLDING: Yes, was there some confusion by everyone
 20 about what it was registered at and what it was?
 21 MS HUMPHREYS: Yes, so up until 2010, our inspection reports
 22 say they were inspected under boarding school standards
 23 and then we moved to the residential special school
 24 standards in 2011. I don't know why, at that point, but
 25 it was the right thing to do because they were, and had

Page 34

1 but things might be going on beneath the surface.
 2 MS HUMPHREYS: So in 2010, the children who still attended
 3 Stanbridge Earls were, in the main, children with
 4 dyspraxia and dyslexia. It was by about 2011/2012 that
 5 the nature of the school changed.
 6 We suspect that is because children whose needs were
 7 dyspraxia or dyslexia could actually be managed in
 8 mainstream schools, so the school, in order to
 9 survive -- and this is not unique to Stanbridge; other
 10 schools have had to do this as well -- have had to
 11 change their admission criteria, so there was a change
 12 of head and we suspect that, in order for the school to
 13 survive, they had to widen their admission criteria and
 14 that is when children with more complex needs and
 15 particularly children starting perhaps on the autistic
 16 spectrum, or children with quite complex emotional
 17 health, wellbeing-type things, but what happened was the
 18 school didn't change to keep pace with that. The
 19 staffing -- the staff didn't receive any additional
 20 training in order to meet those children's needs.
 21 It carried on as it had always done, but actually
 22 with a growing shift in child population.
 23 MS SCOLDING: Is there anything that can be done about that
 24 on a practical level? I am just thinking if a school,
 25 kind of, has always been one thing, and then widens its

Page 36

<p>1 pupil population considerably, is there anything 2 regulatory, are there any sort of notifications that 3 have to happen at the moment? Ms Spielman? 4 MS SPIELMAN: It is the Department of Education that 5 registers schools and records them under a set of 6 categories, and records them as special schools or 7 non-special schools. So I think that's a point to look 8 to the Department of Education for whether they get 9 prompt notifications of a school's change in 10 composition. 11 MS HUMPHREYS: The school can apply for a material change, 12 if they want to change, but it is at which point does 13 a material change kick in. 14 MS SCOLDING: I am just thinking that a large number of 15 pupils with, for example, motor skills difficulties may 16 well also have social communication difficulties, may 17 well also have -- children don't tend to arrive with one 18 package and one label -- 19 MS HUMPHREYS: Absolutely. 20 MS SCOLDING: -- there tends to be a range of problems they 21 have, which can be identified and labelled in a number 22 of different ways, often. 23 MS HUMPHREYS: Absolutely. So it is possible that, if we 24 were out at a school and we felt that the school 25 population was extremely different to what they had been</p> <p style="text-align: center;">Page 37</p>	<p>1 registered for, then we would contact the DfE to raise 2 that with them. 3 In a children's home, it is far easier for us to 4 manage that situation, because, through regulation, we 5 can say they are not complying with their statement of 6 purpose. 7 MS SCOLDING: Okay. In fact, the ISI provided a very 8 helpful guide to the number of inspections there were 9 and what they were from 2010 onwards. 10 Ralph, would you mind getting up ISI001593_003, 11 please. It is just a table which helps us, I think, 12 probably, as we are going through this. 13 So we have got who inspected what, when, and the 14 nature of what was inspected. 15 I think what I am really going to do now is run you 16 through those inspections and just identify some issues 17 that were raised with those which you undertook as 18 Ofsted, not those which the ISI undertook. 19 Now the Independent Schools Inspectorate have told 20 us their inspection in 2010 -- we can see the first one 21 on the table -- was complimentary about safeguarding, 22 but they identified specifically that the independent 23 school standards, which is what they would have been 24 judging against, don't have any specific standards about 25 special schools at all.</p> <p style="text-align: center;">Page 38</p>
<p>1 So they -- and they don't require, for example, that 2 people have particular specialist qualifications, that 3 there is those sorts of factors. 4 Do you think that there should or ought to be -- 5 because you obviously inspect the vast majority of 6 schools in this sector, ISI -- 7 MS HUMPHREYS: We inspect all residential special schools 8 for boarding. 9 MS SCOLDING: But you also inspect the vast majority of 10 special schools, day or residential. I mean, ISI would 11 inspect very few, or have told us they inspect very few 12 of them. 13 MS SPIELMAN: Yes. 14 MS SCOLDING: You are the inspector of choice, shall we say, 15 for the vast majority of those institutions. 16 MS HUMPHREYS: I don't know that the schools would agree 17 with that. 18 MS SCOLDING: Do you think the independent special school 19 standards, as they are currently drafted, should add 20 anything educationally about the particular needs of 21 children -- of special needs children, in order to 22 appropriately reflect the complexity of welfare problems 23 and issues they have? 24 MS SPIELMAN: I don't think that is something that has 25 cropped up in our preparation for this hearing. It is</p> <p style="text-align: center;">Page 39</p>	<p>1 certainly something we can reflect on. 2 MS HUMPHREYS: Yes, we can write a note on that. 3 MS SCOLDING: Okay. What the ISI also says to us is that 4 the ISI inspector was a bit worried that your inspector 5 was a little bit cosy with the school. I don't think -- 6 she doesn't use that language, but I am interpreting 7 it -- 8 MS HUMPHREYS: I think she described him as "a close 9 colleague and a trusted friend", or something like that. 10 MS SCOLDING: Yes. Is that something that you would have 11 expected the ISI to have told you about at the time? 12 MS HUMPHREYS: We understand that they did contact us. We 13 cannot find a record of that, but that doesn't mean to 14 say that it didn't happen. I am not too sure where it 15 would be recorded, and that particular inspector no 16 longer works for us, so -- 17 MS SCOLDING: But is that a general worry? Because we are 18 talking about quite a small sector -- 19 MS HUMPHREYS: Yes. 20 MS SCOLDING: There is a temptation for there to be -- now, 21 I don't think there's anything wrong with having 22 a friendly relationship and having -- you know, being 23 able to be open and transparent, but there a difference 24 between that and what I think the ISI inspector was 25 getting at, that it was all a bit chummy and, "Maybe</p> <p style="text-align: center;">Page 40</p>

<p>1 I will look the other way".</p> <p>2 MS HUMPHREYS: Absolutely.</p> <p>3 MS SCOLDING: How do you guard against that happening?</p> <p>4 MS HUMPHREYS: Within social care, we have a system where</p> <p>5 an inspector cannot inspect any setting for more than</p> <p>6 three consecutive inspections. So with children's</p> <p>7 homes, that would be for three years, and residential</p> <p>8 special schools, that would be three years and, again,</p> <p>9 on those that are on a three-year cycle, that would be</p> <p>10 for no more than three cycles.</p> <p>11 We also have far more robust quality assurance</p> <p>12 arrangements where a manager would select a particular</p> <p>13 inspection to go out and view the relationship.</p> <p>14 Generally speaking, unless it is a very small school,</p> <p>15 there would be more than one inspector.</p> <p>16 MS SCOLDING: Okay. The other issue that the Independent</p> <p>17 Schools Inspectorate picked up at the 2010 inspection is</p> <p>18 that there were problems that they found with the</p> <p>19 central register but they were not picked up by Ofsted.</p> <p>20 Now we saw this last week, with Chetham's and I am</p> <p>21 just going to take you to the single central register</p> <p>22 from Chetham's in a minute, but, again, I think we are</p> <p>23 seeing the same problem.</p> <p>24 Does this show, possibly, because, again, it is the</p> <p>25 same time, 2010/2011. Was there a problem with checking</p> <p style="text-align: center;">Page 41</p>	<p>1 single central registers, do you think, with Ofsted</p> <p>2 inspectors at that time?</p> <p>3 MS HUMPHREYS: The guidance was very clear for inspectors</p> <p>4 that they only looked at boarding schools staff, they</p> <p>5 didn't look at -- which was not right, we accept that</p> <p>6 and we don't do that now, but they would only</p> <p>7 concentrate on the boarding school staff who had been</p> <p>8 appointed since the previous inspection.</p> <p>9 MS SCOLDING: So in a way, the system was flawed because you</p> <p>10 were only looking at some people when there is lots of</p> <p>11 other people teaching, all of whom could have problems?</p> <p>12 MS HUMPHREYS: Access to children, absolutely. And the</p> <p>13 other thing was that if you -- so the inspector would</p> <p>14 look at the single central register in 2010 and would</p> <p>15 look at staff who had been appointed since the previous</p> <p>16 inspection, so if flaws had been identified -- had not</p> <p>17 been identified earlier than -- so 2008, then they would</p> <p>18 never get picked up because those files would never be</p> <p>19 looked at.</p> <p>20 MS SCOLDING: Yes, and that is no longer your practice?</p> <p>21 MS HUMPHREYS: That absolutely is not our practice, and we</p> <p>22 would do more than look at the single central register</p> <p>23 as well, because the single central register just tells</p> <p>24 you dates. What we need to know about --</p> <p>25 MS SCOLDING: You need to look at the underlying --</p> <p style="text-align: center;">Page 42</p>
<p>1 MS HUMPHREYS: Also, we would always ask, "What is the</p> <p>2 recruitment policy?"</p> <p>3 So if I am doing an inspection, I would say, before</p> <p>4 they start showing me the single central register, "Tell</p> <p>5 me how you recruit your staff. I want to understand.</p> <p>6 What do you do? How do you identify the staff, the most</p> <p>7 appropriate staff?", which is far more important than --</p> <p>8 well, as important as, when did the DBS certificate</p> <p>9 come, when did the references come.</p> <p>10 MS SCOLDING: Can I just take you very briefly to Chetham's</p> <p>11 because you remember last week we had all sorts of</p> <p>12 problems finding the right bit of the single central</p> <p>13 register.</p> <p>14 MS HUMPHREYS: Absolutely.</p> <p>15 MS SCOLDING: I have to accredit Mr Wolfe with this.</p> <p>16 Mr Wolfe has gone away and found the relevant bit. Can</p> <p>17 we go to ISI001487, and this is row 98.</p> <p>18 MS HUMPHREYS: Yes.</p> <p>19 MS SCOLDING: It is about six or seven pages down, Ralph,</p> <p>20 row 98. Three more. Three more. Three more. Two</p> <p>21 more. Yes, it is this one, 98.</p> <p>22 This is what Ms Coley found, that she says should</p> <p>23 have been picked up by your inspectors. What she</p> <p>24 basically finds, at row 98, is there is somebody who is</p> <p>25 deputy head of girls' house and we think her start date</p> <p style="text-align: center;">Page 43</p>	<p>1 is that, so she would have been boarding,</p> <p>2 29 October 2007.</p> <p>3 MS HUMPHREYS: 2007, yes.</p> <p>4 MS SCOLDING: If we look at the second box along, first box</p> <p>5 "Deputy head of house", the second box is that.</p> <p>6 Then we see her barred list check only took place</p> <p>7 three months after she was employed and her DBS check,</p> <p>8 again, only took place three months after she was</p> <p>9 employed, and her identity checks and her right to work</p> <p>10 in the UK checks both took place two months after she</p> <p>11 was employed.</p> <p>12 Her medical fitness check, again, only took place</p> <p>13 three months after she was employed.</p> <p>14 Now, under the system that was then in place, and</p> <p>15 actually the system that was currently in place, none of</p> <p>16 that should have happened, should it?</p> <p>17 MS HUMPHREYS: Absolutely, no.</p> <p>18 MS SCOLDING: But of course, again, I think this probably</p> <p>19 raises the same point as Stanbridge Earls did, because</p> <p>20 you identified, that would have been 2008, there would</p> <p>21 have been an inspection of Chetham's -- there was</p> <p>22 an inspection --</p> <p>23 MS HUMPHREYS: There was an inspection in 2008 and, in 2008,</p> <p>24 we made recommendation about the effectiveness of their</p> <p>25 recruitment and selection. So I think it is safe to</p> <p style="text-align: center;">Page 44</p>

<p>1 assume that that was picked up in the 2008 inspection, 2 and then I am not -- I think we can -- are we assuming 3 that she became, then, the practice assistant and head 4 of girls' house -- 5 MS SCOLDING: I think she would have become the head of 6 girls' house on 1 January 2011. 7 MS HUMPHREYS: January 2011, and no further checks would 8 have been done at that point because she was in 9 continuous employment. 10 MS SCOLDING: Okay. I just wanted to check that point with 11 you as I have you here. 12 MS HUMPHREYS: That is fine, that is what we think. 13 MS SCOLDING: Yes. So we have got the 2010 inspection, and 14 the cosiness, which doesn't identify anything. But, 15 also, it raises a bigger problem, which is you have got 16 ISI going in to inspect, Ofsted going into inspect, ISI 17 looking at one thing, Ofsted looking at another thing, 18 but it therefore means that things are falling through 19 the cracks, because ISI would say, "We are not looking 20 at the boarding staff", Ofsted would say, "We are not 21 looking at the day staff", and it is likely that, 22 between those two things, things would, you know, fall 23 between them. 24 Firstly, was that something that was common, that 25 those problems arose, or do we think we have just</p> <p style="text-align: center;">Page 45</p>	<p>1 chanced upon two particular examples where that took 2 place, or do we think that was a more widespread problem 3 with inspection at that time? 4 MS HUMPHREYS: We don't know for sure without going back and 5 doing a great deal of research in terms of every 6 inspection that was done at that point. 7 The situation doesn't occur as much now, because we 8 only have a very small number of schools where ISI 9 inspect the education and we inspect the boarding. 10 A handful of schools, now. 11 We also have much clearer guidance for our 12 inspectors as to how to undertake those inspections 13 which we call "aligned inspections". So we can never 14 say it is not possible -- it would never happen again, 15 but the likelihood of it happening again is far smaller. 16 MS SCOLDING: But, I mean, is there the level of 17 cooperation? Because I would have thought -- 18 MS HUMPHREYS: Yes. 19 MS SCOLDING: -- that probably the inspections should all 20 take place at the same time, if at all possible. 21 MS HUMPHREYS: Yes. 22 MS SCOLDING: Because then -- I mean, we have seen that 23 example in Chetham's when the ISI went in with the local 24 authority and in other schools where you have gone in 25 with the ISI, where, you know, suddenly all those</p> <p style="text-align: center;">Page 46</p>
<p>1 problems miraculously resolve themselves. Ms Spielman? 2 MS SPIELMAN: I mean, it reflects some of the difficulties 3 of having multiple inspectorates, without a shadow of 4 doubt. 5 At one level, I think you can have clarity. So, for 6 example, in this case, there is a distinction between -- 7 generally between the people working in boarding and day 8 staff, but some people may be caught by both, may have 9 a boarding role and a school role, so may be double 10 counted, and it is more the systemic piece that the same 11 people and structures are responsible for both sides, 12 so, actually, the issue you were identifying may be more 13 about bringing together what is seen from strengths and 14 weaknesses on the two sides. 15 MS SCOLDING: Yes. 16 MS SPIELMAN: I don't think it is so much about things 17 falling in between and not getting scrutinised as it is 18 about making sure that full picture is assembled. 19 MS SCOLDING: I think you reflect what Ms Richards said, 20 which is they find it a lot better to inspect both the 21 boarding side and the day side together, because you can 22 really get a much better picture of what is going on. 23 MS HUMPHREYS: That is right, when the two inspections 24 coincide because we inspect the boarding of residential 25 special schools every year, whereas the education is not</p> <p style="text-align: center;">Page 47</p>	<p>1 done on the same frequency. 2 MS SCOLDING: Okay, can we go back, Ralph, please, to 3 ISI001593, just so we can keep track of what is going 4 on. We have the 2010 inspection, which didn't really 5 bring anything up. It is page 3, please, Ralph, if you 6 could get that up. 7 We have then got, you then go in and inspect again 8 in 2011, because, of course, because you are now 9 inspecting under the residential special school, you 10 inspect annually. 11 MS HUMPHREYS: But Stanbridge was always inspected annually, 12 even under the boarding school standards, even though it 13 was registered as a special school. This is some of 14 the -- 15 MS SCOLDING: The irony of some of it, really. 16 MS HUMPHREYS: Yes. 17 MS SCOLDING: You go in, I don't think I need to take you to 18 the inspection, but what it basically says is that it 19 was "outstanding" in all areas. 20 Now, you have undertaken a review, you undertook 21 a review in 2013, after there was various criticism and 22 the troops went in, so to speak. What was wrong with 23 that inspection? 24 MS HUMPHREYS: The inspection was flawed, in that the 25 evidence base was the same evidence base as for the 2010</p> <p style="text-align: center;">Page 48</p>

<p>1 inspection and the inspectors started with that evidence 2 base and looked to see if anything had changed since the 3 2010 inspection. There were also various things that 4 she identified during the inspection which the school 5 put right during the inspection, but then wasn't taken 6 into account in the judgment or reflected in the 7 narrative of the report. 8 MS SCOLDING: I don't think I need to get it up, but at -- 9 we do have a document at OFS011660 which is the evidence 10 base in which you identify in -- and what is different 11 between the two evidence bases -- 12 MS HUMPHREYS: There is very little. 13 MS SCOLDING: -- and there is nothing. I mean, there's 14 probably a few sentences different. 15 You also identified that there was a problem because 16 they allowed things to be put right as they were going 17 along. Isn't that a sensible thing? 18 MS HUMPHREYS: Yes, so absolutely, if any setting wants to 19 put something right during an inspection, obviously we 20 would not hold it against them and we would accept that, 21 but what you cannot and -- so the situation, one of the 22 situations here was that there was lots of complaints 23 about the food and in particular the choice of food in 24 an evening. 25 MS SCOLDING: That would be certainly a major concern of</p> <p style="text-align: center;">Page 49</p>	<p>1 mine, oftentimes. 2 MS HUMPHREYS: It was a key standard. The school made some 3 changes during the inspection, but then the inspector 4 was not able to -- 5 MS SCOLDING: Test the food? 6 MS HUMPHREYS: -- assess the impact or whether it reverted 7 back the following week. 8 MS SCOLDING: So it was kind of baked beans on toast every 9 night and then, suddenly, there was a three-course 10 gourmet meal on show and who knows whether it was baked 11 beans the following week? 12 MS HUMPHREYS: Absolutely. Also, we would always pick up as 13 to why -- particularly why leaders and managers had not 14 identified and acted on -- they might put something 15 right, but then we would need to look at, "Why had you 16 allowed it to go wrong?" 17 MS SCOLDING: On the one hand, you might sit there and think 18 well, food, that is, on the one hand, trivial, but on 19 the other hand, it is the sort of thing children do 20 complain about. 21 MS HUMPHREYS: It is one of the most important things to 22 children who live in boarding schools and residential 23 special schools, it is the thing we have the most 24 complaints about. 25 MS SCOLDING: So, in fact, it tells you a lot about the</p> <p style="text-align: center;">Page 50</p>
<p>1 culture of the school if the children are saying, "We 2 are not very happy with the food", a bit like toilets, 3 maybe. 4 What you also say in your witness statement is that 5 the inspection report didn't look at parental concerns 6 which had been identified in questionnaires. What 7 difference would that have made, if she had looked at 8 those sorts of things a bit more carefully? 9 MS HUMPHREYS: Because it would have exposed some of the 10 concerns that later came in, particularly about bullying 11 and about the quality of the girls' accommodation. 12 MS SCOLDING: You also say, in the 2011 report there wasn't 13 a sufficient focus on the fact that, as I understand it, 14 there had been a very significant change in staff 15 personnel, lots of people had left, I think it was, 16 like, the DSL had gone, the head had gone -- 17 MS HUMPHREYS: The chair of governors. 18 MS SCOLDING: -- the chair of governors had gone, people who 19 had been in place, there was a wholesale change of staff 20 and a change of pupils and you say that there should 21 have been some focus on that in the inspection. 22 MS HUMPHREYS: Absolutely. 23 MS SCOLDING: Okay. Right. You then received a complaint, 24 I think, which post-dated that, from the parents of 25 a child who ultimately went to the Special Educational</p> <p style="text-align: center;">Page 51</p>	<p>1 Needs Tribunal. 2 Could we look at that, please, Ralph, briefly. That 3 is OFS001284_001, please. 4 This is a letter that was sent to you at Ofsted 5 in October 2011 saying "We are seriously concerned about 6 the school's actions or lack of them which has harmed 7 their daughter. It became apparent that their daughter, 8 who has ... and is at P scales" -- I don't think that is 9 accurate, P scales is below five years old -- "was 10 sexually abused and assaulted on at least two occasions 11 and they were unable to stop her regular harassment. 12 She was constantly harassed and this was because of the 13 alleged rape." 14 Can we go to the next page, please. It then sets 15 out the details of the sexual assault and identifies two 16 incidents of aggressive sexual assault which then 17 resulted in medical advice being sought from the school 18 nurse, the nurse then seeking from the doctor and her 19 being treated without reference to her parents, without 20 the doctor. 21 Now, can I just identify, this girl, I think, was 22 under the age of consent, so -- or she might just have 23 been -- 24 MS HUMPHREYS: I think she was under the age of 16. 25 MS SCOLDING: She was under the age of 16.</p> <p style="text-align: center;">Page 52</p>

1 She was a vulnerable child:
 2 "The school failed to inform parents [about any of
 3 this] and they only emerged [these issues] ... they
 4 contacted the headmaster."
 5 Can we go to the next page, please, Ralph.
 6 There is then a campaign of harassment,
 7 inappropriate texts, a bracelet was stolen of hers on
 8 the school ground, head teacher was fully aware of that:
 9 "We attach the statement ..." et cetera, et cetera.
 10 I don't think we need to look at the particular
 11 underlying documents.
 12 So you received -- Ofsted received a complaint.
 13 What did it do with that complaint?
 14 MS HUMPHREYS: We referred the matter to the LADO.
 15 MS SCOLDING: Should it have referred the matter to the
 16 LADO?
 17 MS HUMPHREYS: No, the matter should have been referred to
 18 Children's Services, the local Children's Services which
 19 would have been Hampshire.
 20 MS SCOLDING: Because the LADO --
 21 MS HUMPHREYS: With adult -- concerns against the practice
 22 of an adult. This was a Children's Services concern.
 23 MS SCOLDING: Right.
 24 I mean, should the LADO deal with peer-on-peer
 25 issues, I suppose is one of the issues which gets raised

Page 53

1 serious set of allegations?
 2 MS HUMPHREYS: Absolutely, yes, and it didn't get given.
 3 MS SCOLDING: It didn't trigger, so nobody was on the phone
 4 to the school saying, "What are you doing?", on the
 5 phone to the LADO saying, "Have you referred it to
 6 social services?"
 7 MS HUMPHREYS: Contact the last inspector, "Were you aware
 8 of this matter ..."
 9 That is just not how it would be done now.
 10 A concern of this nature that came in would be
 11 escalated, almost immediately, to the senior HMI in the
 12 region, if not the region director, and possibly even
 13 the national director. I mean, it was so concerning,
 14 those matters that are raised in this letter.
 15 MS SCOLDING: Okay, are there now systems in place to stop
 16 it sort of getting lost in the ether, so to speak?
 17 MS HUMPHREYS: Yes, so the guidance is extremely clear,
 18 notifications are tracked as they come in through the
 19 system, and one similar situation like this, we would
 20 have a target that a decision would have to be made
 21 within 24 hours as to what should happen to it, and at
 22 what level the decision making should be.
 23 MS SCOLDING: Right.
 24 You did -- Ms Spielman?
 25 MS SPIELMAN: Sorry, I will let you --

Page 55

1 from this, would it be sensible, particularly in
 2 circumstances where there is an allegation where the
 3 school has not taken appropriate steps?
 4 MS HUMPHREYS: I think the first issue, it should have been
 5 reported to Children's Services and then Children's
 6 Services should have decided how they were going to act
 7 on that and then it would have been for them to refer it
 8 to the LADO.
 9 MS SCOLDING: Yes, okay.
 10 But, as a result of this case, you identified in the
 11 review that was undertaken in 2013 that there were some
 12 problems with the way that this complaint was dealt with
 13 and in the way that inspectors treated referrals to
 14 LADOs. Could you tell us a little bit about that?
 15 MS HUMPHREYS: Yes, so what became clear was that
 16 information of this nature, when it came into Ofsted,
 17 there wasn't a clear route as to how things were to be
 18 dealt with. There was sometimes a bit of a scattergun
 19 approach with lots of people getting involved and
 20 then ... or things like, "Well, we referred it to the
 21 LADO. We don't need to do anything more", instead of
 22 following up. In fact, we need to be ringing the
 23 school, we need to be contacting and being far more
 24 proactive.
 25 MS SCOLDING: Because, obviously, that's an extremely

Page 54

1 MS SCOLDING: No.
 2 MS SPIELMAN: I just wanted to come in to say, from when
 3 I arrived, it was very clear that the case of
 4 Stanbridge Earls had been a sort of galvanising event
 5 for Ofsted and my predecessor had taken it
 6 extraordinarily seriously and it had been approached
 7 from the very beginning not just as a failure of some
 8 individual inspectors, but as something showing sort of
 9 weaknesses in a number of our systems. So from the very
 10 beginning, it was approached as something needing some
 11 systemic change and the action plan and the execution
 12 and follow-up on that was something that was very much
 13 live in people's memories. In fact, the
 14 Stanbridge Earls cropped up so much in my early
 15 briefings that one of the things I did in my first
 16 couple of months was to ask for a specific briefing on
 17 the whole case.
 18 It is something where, notwithstanding that in some
 19 ways we think it was very unusual for us, but also we
 20 took account of every implication.
 21 MS SCOLDING: Okay, so there was a referral to the LADO,
 22 I understood the LADO then referred it to the police.
 23 We don't really need to deal with the issues.
 24 But you did also write to the Department for
 25 Education, enclosing the letter and saying it needed to

Page 56

1 be addressed. The Department for Education wrote back,
 2 as I understand it, saying they would commission
 3 an unannounced inspection to look at supervision,
 4 bullying and safeguarding. They then wrote again, as
 5 I understand it, four weeks later, but did not use the
 6 word "safeguarding", and that then led to the inspection
 7 of January 2012.
 8 Now, in the context in which the 2012 inspection was
 9 commissioned by the DfE, do you think they needed
 10 explicitly to use the word "safeguarding" for
 11 safeguarding to have been looked at?
 12 MS HUMPHREYS: Yes, unfortunately, at the time -- and,
 13 again, this is not how we operate now -- if the DfE
 14 commissioned us to do -- to undertake an inspection and
 15 set out which areas need to be looked at, then we would
 16 only look at those areas.
 17 MS SCOLDING: Okay, so can I get up -- you go in,
 18 in January 2012, and you find that everything is
 19 "outstanding".
 20 MS HUMPHREYS: Well, we don't make -- we didn't make
 21 a judgment in 2012.
 22 MS SCOLDING: But you then sent an advice note to the DfE
 23 and this is at OFS009562, and the advice note -- can we
 24 go to the next page, please?
 25 Next one.

Page 57

1 We don't have powers under section 47 to undertake
 2 a child protection investigation, but what we should
 3 have done was to have gone back to the DfE and say, "You
 4 initially said you wanted us to look at safeguarding.
 5 The commission has come through. Safeguarding is not
 6 mentioned. Can you explain why?", and we would want to
 7 look at that as well.
 8 MS SCOLDING: Instead of which, you didn't sit there and
 9 think, "Actually, I am not sure any of this is really
 10 going to find out what is going on at the school?"
 11 MS HUMPHREYS: That's right. There was not --
 12 MS SCOLDING: There wasn't that sort of thought process?
 13 MS HUMPHREYS: No, and now -- well, two things are different
 14 now. Firstly, we would be far more assertive with the
 15 DfE in terms of, is that what we really should be doing?
 16 MS SCOLDING: I can't imagine you, Ms Humphreys, ever being
 17 unassertive with the DfE or, in fact, anybody else.
 18 MS HUMPHREYS: The second thing is, we exercise our powers
 19 under section 87 of the Children Act in an independent
 20 school and we would go in without a commission from the
 21 DfE.
 22 We wouldn't wait for the DfE to commission us, we
 23 would exercise our powers.
 24 MS SCOLDING: Okay.
 25 So you find it and, unsurprisingly, nothing gets

Page 59

1 Yes, that just provides -- is this still what
 2 happens these days?
 3 MS HUMPHREYS: No.
 4 MS SCOLDING: Okay, maybe you can tell us what happens these
 5 days, but let's have a look at what happened then.
 6 It says:
 7 "The areas covering this visit are: bullying; staff
 8 supervision; and the standard of girls' accommodation."
 9 MS HUMPHREYS: Yes.
 10 MS SCOLDING: That seems palpably inadequate, when you have
 11 got a child who has just accused somebody of rape, just
 12 to have a quick look at the bullying. Are you really
 13 going to find out what has been going on? Really, your
 14 job -- a very serious complaint has been made, the DfE
 15 has said it is going to send an inspector in, are you
 16 really the right people to go in at this stage? Surely
 17 there should be something which looks more like
 18 an investigation, like a social services investigation
 19 or a police investigation?
 20 MS HUMPHREYS: So the view taken at the time was that it was
 21 for Hampshire Children's Services to undertake
 22 an investigation into the safeguarding matters.
 23 MS SCOLDING: Yes, because that is -- this is one of the
 24 difficulties, it is not your job.
 25 MS HUMPHREYS: No. No.

Page 58

1 found. Particularly as there seems to be interviews
 2 with the headmaster and the boarding team and then
 3 a tour and interviews with groups of boarders, but
 4 shouldn't there have been a specific sort of
 5 identification of thinking about the girls, getting them
 6 separately, looking at talking to them separately?
 7 MS HUMPHREYS: Absolutely. And definitely some exploration
 8 as to what this "teasing" means, "but no real bullying",
 9 and I have to say this comes up quite a lot.
 10 MS SCOLDING: What on earth -- to my mind, there is no
 11 real -- there a line between teasing and bullying, but
 12 isn't that something that should have concerned the
 13 inspector?
 14 MS HUMPHREYS: Absolutely. And schools will say this, "We
 15 haven't got any bullying here. There is bit of banter
 16 or some teasing, and this sort of thing", and absolutely
 17 don't accept that at face value, you need to explore
 18 what that actually means.
 19 Because we know that teasing can be awful for
 20 children and it might not have the title of "bullying",
 21 but it has the same impact.
 22 MS SCOLDING: Yes, and, again, you agree that the inspection
 23 was basically completely flawed?
 24 MS HUMPHREYS: Yes, and we have no evidence base either.
 25 MS SCOLDING: Right, okay.

Page 60

<p>1 So that is -- but I suppose the question that has to 2 be asked is, again, is this idiosyncratic or does this 3 demonstrate a systemic failure to really get under the 4 skin of what is going on in boarding schools at this 5 time. 6 MS HUMPHREYS: So around this time -- I mean, we haven't had 7 any -- we haven't had one as serious, in terms of that 8 complaint that came in, that we can find and could be 9 found at the time. But it was very much what we did. 10 We did what the DfE asked us: we went in, we looked at 11 things and we came away and we told the DfE, and very 12 much waited for them to take action. 13 MS SCOLDING: Right. So it was much more of a passive 14 approach than an active approach? 15 MS HUMPHREYS: Yes, which is not how it is now. 16 MS SCOLDING: Right, and it is not how it should be; am 17 I right? In some circumstances, it would be perfectly 18 fine, as an inspector, to be passive, but maybe not in 19 inspecting schools and children's welfare? 20 MS HUMPHREYS: Yes. 21 MS SCOLDING: Then I understand that the complaint was 22 basically closed by Ofsted, so again, is this just 23 coming back to that shouldn't have happened? 24 MS HUMPHREYS: That's right, because we had three teams that 25 dealt with complaints at the time, and it was not clear</p> <p style="text-align: center;">Page 61</p>	<p>1 as to who had responsibility and, when the letter came 2 in to say that there was no complaint against Ofsted, 3 the complaint was against the school, that was seen as 4 a signal to close down the complaint and not take it any 5 further. 6 MS SCOLDING: But that is actually because the individuals 7 writing the letter of complaint misunderstood the role 8 that you could play, if you had chosen to do so? 9 MS HUMPHREYS: Yes, that's right. Yes, absolutely. 10 MS SCOLDING: Okay, so we are now going to -- shortly after 11 the January 2012 inspection, another parent made 12 a complaint regarding their child being pressurised to 13 undress, as I understand it. 14 MS HUMPHREYS: Yes. 15 MS SCOLDING: Ofsted, therefore, internally recognised there 16 was likely to be a catalogue of information, which meant 17 the 2011 inspection and possibly the 2012 inspection 18 were not really understanding, and, again, there was 19 a referral to the LADO. 20 MS HUMPHREYS: Yes. 21 MS SCOLDING: And, again, the LADO said, "I am not dealing 22 with this, because it is not my job". You then sent the 23 referral to the Department for Education, whose response 24 was at -- can we get up, please, Ralph, OFS011578_014, 25 please.</p> <p style="text-align: center;">Page 62</p>
<p>1 Yes, "a catalogue of information". Then can we go 2 down to the next -- to (v), please, Ralph: 3 "The DfE requested" -- so you wrote to the DfE and 4 provided the information saying, "I really think 5 something is going on here": 6 "The DfE requested that the concerns be looked at 7 only during the next full inspection." 8 And, in communicating this, they say: 9 "Taking these two complaints together, there seems 10 to be a significant [top of next page, please] 11 discrepancy between the experiences, admittedly to 12 a great extent in relation to matters which can be 13 difficult to inspect fully." 14 Is that true? 15 MS HUMPHREYS: Yes, because, as we have already been -- as 16 we have already said, it wouldn't have been our role to 17 investigate the actual incident as per under section 47 18 as a safeguarding enquiry, but it would have been 19 appropriate to have looked around the situation as to 20 how this possibly could have happened and what the 21 action of the school was, having had that matter 22 reported to them, because both letters say that the head 23 teacher had been notified about these incidents, and so 24 it would have been appropriate to have found out what 25 action the school took.</p> <p style="text-align: center;">Page 63</p>	<p>1 MS SCOLDING: Yes, even if you couldn't investigate the 2 actual incident, you could have investigated what the 3 response of the school was. 4 MS HUMPHREYS: The school was -- and the circumstances that 5 allowed it to happen, because what we did discover, when 6 we went in, in 2013, and had never been raised before, 7 was that there was extensive grounds for this school, 8 a heavily wooded area, where the children were allowed 9 to go in, completely unsupervised, which is, of course, 10 where these incidents took place. 11 MS SCOLDING: And, as I understand it, a number of those 12 incidents were alleged to have taken place in the wooded 13 area where nobody would have known what was going on? 14 MS HUMPHREYS: Yes. 15 MS SCOLDING: What I am also interested in is the DfE then 16 saying: 17 "It would seem heavy-handed and possibly 18 unproductive to simply have another unannounced 19 inspection so soon after the last one." 20 I suppose I am asking the question, is that right? 21 Because I am thinking, somebody is alleging they have 22 been raped and then subjected to a campaign of 23 harassment. Somebody else is alleging their daughter 24 was also made to undress. So you have got a pattern of 25 quite serious sexual harassment in the context of</p> <p style="text-align: center;">Page 64</p>

<p>1 a boarding school. So it is not like these children can 2 go home and speak to their mum, they are much more 3 reliant on people like you. 4 I would say, what is heavy-handed about, you know -- 5 MS HUMPHREYS: Absolutely, we would agree. 6 MS SCOLDING: -- isn't it exactly the sort of occasion where 7 one puts rather heavy boots on and decides to go in with 8 both feet -- 9 MS HUMPHREYS: Mob handed. 10 MS SCOLDING: Yes. Yes. 11 MS HUMPHREYS: We would carry out, even if -- if this was 12 happening today, and hopefully it wouldn't in these 13 circumstances, irrespective of whether the DfE wanted to 14 us to not go in, we would go in, because we would 15 exercise our powers. 16 MS SCOLDING: Right, and then, in May 2012, there was then 17 another inspection, so this is the brought forward 18 inspection from the January, everything was outstanding, 19 including outstanding for safeguarding. 20 So tell me, what was wrong with that inspection 21 then? In particular, maybe let's have a look at the 22 inspection itself. So is that OFS009801_004. 23 So at the bottom -- I mean, it says there: 24 "In addition, the headmaster, combined with the 25 online ... further enhanced the knowledge of</p> <p style="text-align: center;">Page 65</p>	<p>1 safeguarding, robust systems, staff are confident, good 2 links ..." 3 All of this sounds like a completely different 4 school to the school we are hearing about in the 5 letters. How could an inspector have reached that 6 conclusion? 7 MS HUMPHREYS: Because they failed to get underneath what 8 was happening and the -- I think we have submitted the 9 outcome of the EBR report, it is in the witness 10 statement, that the inspector didn't look properly 11 enough. The interview with the head teacher in relation 12 to the complaints wasn't then verified, it was just 13 taken as read, and the comments that the head teacher is 14 recorded to have said in the evidence base are the same 15 comments that they made in the tribunal findings as 16 well. So it was a clear view. 17 MS SCOLDING: Which was highly critical of the head teacher. 18 MS HUMPHREYS: That's right. 19 MS SCOLDING: Just to sort of follow up, ultimately the 20 Teaching Regulatory Agency found several incidents of 21 unprofessional conduct against it in 2018, as they did 22 with the individual who was the deputy head and the 23 safeguarding lead at the time, largely around failing to 24 respond effectively in child protection cases and 25 failing to have appropriate policies.</p> <p style="text-align: center;">Page 66</p>
<p>1 MS HUMPHREYS: That's right. 2 There is no evidence in the evidence base that the 3 inspector looked at safeguarding records of any other 4 incidents. There was no cross-checking for risk 5 assessments and care planning and looking as to how 6 these incidents could have happened. 7 The view at the time was the inspector thought that 8 the matters had been investigated and found that there 9 was no further action to be taken and, therefore, 10 skirted around the issue, really. 11 MS SCOLDING: I suppose there were two issues which arise 12 here. Firstly, whether or not it is the fault of not 13 just an individual inspector, but whether there is 14 a systems issue about the quality assurance of 15 inspections, which was not happening at that time, or, 16 secondly, there is also an issue about how appropriate 17 or how effective inspection can be in these sorts of 18 cases? 19 MS HUMPHREYS: So definitely, at the time, the quality 20 assurance arrangements were not appropriate. The 21 guidance and the framework that schools were inspected 22 against had some weaknesses. So there was definitely 23 those two areas were there. 24 However, it is possible, so it is easier, when you 25 go into a school, if you have got a specific issue to</p> <p style="text-align: center;">Page 67</p>	<p>1 look for. That is, you know, well founded. You know 2 what you are looking for and you can plan -- 3 MS SCOLDING: I think we have got examples of it, because we 4 have got Chetham's, we have got Wells, we have got this 5 school, and we have got another school, Chelfham Mill, 6 that we are going to have a look at in a moment, all of 7 which identify that if you know what you are looking 8 for, you can find it, but if you don't know what you are 9 looking for, it is -- 10 MS HUMPHREYS: It is more difficult but it is not 11 impossible. 12 MS SCOLDING: Right. 13 MS HUMPHREYS: Because you still undertake the tasks that 14 you would look at -- that you would do, which would be 15 to talk to staff, talk to professionals, talk to 16 children, look at the way the school values children and 17 their self-esteem and the way they listen to them, the 18 way complaints are handled and all that can bring you to 19 a position to make a decision that either the 20 safeguarding culture is there or not. 21 Sometimes, as I have said last week, sometimes 22 things fall into your lap: sometimes you just open 23 a document that perhaps you were not expected to see, 24 and there is something; sometimes a child will say 25 something; and sometimes a member of staff will say --</p> <p style="text-align: center;">Page 68</p>

1 and you can take that along.
 2 Sometimes you reach a point where you have gathered
 3 a lot of evidence, and you are trying to make sense of
 4 what this actually means, and you can reach a point
 5 where you find a hypothesis and you can test that out.
 6 So an example in this situation might be, "Your
 7 statement of purpose says that you are going to keep
 8 children safe, this is your first priority, or your
 9 policies say this, but actually, you allow your children
 10 to go into this wooded area completely unsupervised, you
 11 allow your children to go out into the middle of
 12 Manchester and they don't have to say where they are, so
 13 can you explain to us how these two things can come
 14 together?" And the response that you are given can tell
 15 you an awful lot about the culture of safeguarding,
 16 without you actually finding anything specific.
 17 MS SCOLDING: What does it also tell us about quality
 18 assurance? How has that changed in terms of ensuring
 19 these sorts of problems don't happen again, either for
 20 yourself or Ms Spielman, depending on --
 21 MS SPIELMAN: I will let Helen start and then I will ...
 22 MS SCOLDING: Yes.
 23 MS HUMPHREYS: If this set of circumstances were presented
 24 again, and we have not had -- to my knowledge, we have
 25 not had something as serious as this and worrying as

Page 69

1 MS HUMPHREYS: Yes. Yes.
 2 MS SCOLDING: Next, there were no risk assessments, even
 3 though they had children who had complexities and, as
 4 you have identified, had grounds which meant that all
 5 sorts of things could go on without anybody seeing them.
 6 Also, there were some failures with the child
 7 protection policy, which, again, that should, and could,
 8 have been identified.
 9 MS HUMPHREYS: Absolutely.
 10 MS SCOLDING: And that staff were working without CRB
 11 checks -- I mean, that is about as basic as it comes,
 12 really, isn't it? -- and, again, that safeguarding
 13 reports to the governors were not looking at significant
 14 incidents and actions and that the governing body is
 15 limited.
 16 Now, that raises an issue more generally, because
 17 this is not the first time that has been seen as
 18 a problem.
 19 Again, I am thinking back to music schools last
 20 week. We are seeing very similar issues and problems
 21 arising in the context of this school, and it raises
 22 an issue which I would like to raise both with you,
 23 Ms Humphreys, and you, Ms Spielman, which is whether or
 24 not governors in these sorts of schools have enough
 25 training and understanding to really act as the sort of

Page 71

1 this but we certainly do get concerns, this would then
 2 be considered a high-profile inspection, you would be
 3 looking to put a very strong team on it -- I might go on
 4 it, that is not unknown; I did one earlier on this
 5 year -- and you would be in contact with a manager or
 6 somebody in the quality assurance team, to be providing
 7 advice and support all the way through the inspection.
 8 MS SCOLDING: Right. Can I also identify here, there was
 9 then an inspection in 2013 in January, after -- so after
 10 the tribunal judgment, I think it would appear from
 11 a number of agencies that then appeared that almost all
 12 hell broke loose, in that everybody seems then to have
 13 gone in over the next six months. You went in, in
 14 early January, and found a number of things that had not
 15 been found before, in particular, too little formal care
 16 planning -- again, that's something which should easily
 17 have been identified in previous inspections, shouldn't
 18 it?
 19 MS HUMPHREYS: Yes, definitely.
 20 MS SCOLDING: Secondly, no individual placement plans for
 21 need and for welfare.
 22 Now, whilst I think they had gone under -- the 2011
 23 regulations, I think, changed those, certainly that is
 24 something which should have been picked up, shouldn't
 25 it?

Page 70

1 critical friend and challenge in these circumstances?
 2 MS SPIELMAN: Do you want to go to governors right now?
 3 MS SCOLDING: Yes.
 4 MS SPIELMAN: If I can make a slightly more general point,
 5 by way of context, there are a number of sources of
 6 assurance. I can absolutely understand why, from
 7 a parents' and a child's point of view, it would be
 8 lovely if one mechanism could provide total perfect
 9 assurance. It doesn't, and that is why we have
 10 a combination of professional standards for individuals,
 11 governing body responsibilities, inspectorate
 12 responsibilities, local authority responsibilities,
 13 which, between them, are endeavouring to provide the
 14 strongest possible mechanism.
 15 Governors in our system are given quite a lot of
 16 responsibility. In some contexts, that works quite
 17 well; in others, less well. I think we are going to
 18 talk a bit later about proprietary schools, for example.
 19 But I think what is important, it is very important that
 20 governors are equipped to do the job that is expected of
 21 them, while having this level of realism that they
 22 cannot do everything.
 23 MS SCOLDING: They can't know the school, but what they can
 24 do is try and make sure there are systems in place so
 25 that problems come to them and so they know what to do.

Page 72

<p>1 MS SPIELMAN: Absolutely and it seems curious, in state 2 schools, I am fairly certain, I am certain, that it is 3 required that governors have some level of safeguarding 4 training. 5 MS SCOLDING: In maintained schools there is a compulsory 6 requirement for anybody who is going to interview a head 7 teacher that they have to have Safer Recruitment 8 training, but other than that, there is no mandate 9 either in the state or in the independent sector. 10 MS SPIELMAN: In practice, it would be extraordinarily 11 unusual, in the state sector, not to expect some level 12 of safeguarding training participation by governors. 13 In the independent school, again, in this wide sort 14 of permissive space, much more is left to the 15 responsibility of the individuals to decide what to 16 undertake, but with the responsibilities of governors as 17 they currently stand, it is hard to see how somebody 18 could fulfil the expectations in KCSIE, for example, 19 without having had some level of training. 20 MS SCOLDING: In fact, that chimes with what both the state 21 and Independent Governors' Association have told us 22 about thinking there should be the introduction of some 23 kind of training requirement. 24 Training doesn't solve the problem, necessarily -- 25 MS SPIELMAN: It doesn't, it is one piece.</p> <p style="text-align: center;">Page 73</p>	<p>1 MS SCOLDING: -- but it at least goes some way to it. 2 There is the January 2013 inspection -- I have just 3 taken you through that, Ms Humphreys -- and there is 4 then a further report in April 2013. I am not going to 5 get that up, but just to identify that the National 6 Autistic Society had gone in by that stage and found 7 that they had taken -- the school had taken children 8 with autism, but that none of the staff had even basic 9 training or awareness to deal with that. 10 Now, again, isn't that something which the 11 inspectors should have picked up before, just asked the 12 question "Have you been on a course?". 13 MS HUMPHREYS: Yes, it should have been identified in the 14 2012 inspection because it was around that period of 15 time, '11/12, when the school admission criteria 16 changed and they started taking children with additional 17 needs. 18 MS SCOLDING: Now, at the moment, there are not any specific 19 qualifications or experience that staff need to have 20 within the special educational needs sector or within 21 the special schools sector, there is nothing to say you 22 have to have this or you have to have that. 23 Thinking more broadly, for both of you, is that 24 something which would be useful or helpful to judge 25 against in terms of inspections or would it just add to</p> <p style="text-align: center;">Page 74</p>
<p>1 the burden of trying to recruit people in a market which 2 is quite small anyway? 3 MS HUMPHREYS: That is a challenge. But, equally, what is 4 more important is, what has been the impact of any 5 training that staff have undertaken? 6 When we go in to inspect any settings, a provider or 7 a head teacher can provide a fantastic matrix that tells 8 you which training each member of staff has gone on, but 9 that is only a very, very small part of the picture, 10 because what we want to do is talk to staff and say, 11 "What is the impact of that training? What did you 12 learn on that training?", and then observe practice and 13 see if then that -- the impact of that training has been 14 put into practice. 15 MS SCOLDING: Okay. 16 So, again, within that inspection, however, 17 in April '13, there had been two significant incidents 18 which Ofsted found had not been managed appropriately at 19 the school and that staffing arrangements were 20 inadequate, so that a person, within one week of 21 starting, had been left in charge of 39 boys with nobody 22 else there, and six new staff had been working at the 23 school without a DBS check. 24 That is what happens in April, so that report picks 25 up quite fully the problems that there still were at the</p> <p style="text-align: center;">Page 75</p>	<p>1 school. 2 MS HUMPHREYS: And the head teacher had left by now as well, 3 and the chair of governors had stepped down again. 4 MS SCOLDING: Then, in June 2013 -- this is the last 5 inspection before the school closed in the summer of 6 that year -- you -- I mean this is when I would describe 7 there a sort of mob-handed -- there are six 8 inspectors -- 9 MS HUMPHREYS: No, in June 2013, there was only two 10 inspectors. 11 MS SCOLDING: Was it the April 2013? 12 MS HUMPHREYS: Yes, that was when various other people went 13 in, ISI went in, Charity Commission went in, yes. 14 MS SCOLDING: You had the Charity Commission and the ISI in, 15 yourself in and, I think, was it the Children's 16 Commissioner? 17 MS HUMPHREYS: The Children's Commissioner, yes. 18 MS SCOLDING: Do you think, therefore, there is a role -- 19 given that, when all those people go in together, they 20 find something, does that maybe not show you that that 21 is what needs to happen, that there needs to be lots of 22 people going in, in this context, in inspections, rather 23 than just one or two people over one or two days, or is 24 that me identifying a counsel of perfection? 25 MS HUMPHREYS: I think it very much depends on the context</p> <p style="text-align: center;">Page 76</p>

<p>1 and the nature. In routine inspections, there is -- it 2 is not necessary to have a large inspection team. 3 What you need is a team that can bring their 4 expertise and knowledge together to identify what might 5 be happening at a school and, if that is achieved by 6 different agencies, then that perhaps is the way to go. 7 MS SCOLDING: Ms Spielman? 8 MS SPIELMAN: I think I would like to distinguish here 9 between routine inspection in the various functions it 10 performs, one of which is providing part of this picture 11 of assurance and establishing, for example, whether 12 there is a culture of safeguarding that is carried 13 through that is alive in the school. 14 Related to that, there is one piece which is 15 around -- the process of participating in the inspection 16 puts everybody in the school who is involved in it 17 through a sort of serious dialogue about this that helps 18 them to reflect themselves. 19 Not just, "Am I getting this right or wrong?", but 20 "Am I putting enough time in?", notwithstanding that it 21 meets the acceptable minimum at the moment, "Am 22 I putting enough time and effort into it, do I need to 23 spend more time on this as a manager in future?" 24 Beyond that, the conversations in senior leadership 25 teams and governing bodies in schools, we know tend to</p> <p style="text-align: center;">Page 77</p>	<p>1 echo the conversations that happen at inspection. 2 We know that in schools, when a great deal of 3 emphasis was placed on academic results, on Progress 8 4 measures or whatever, that conversation gets reflected, 5 so by talking about the culture of safeguarding, how 6 that is carried through, training, practice, discussion 7 of concerns and so on, by us putting a lot of time into 8 talking about that, it has a sort of developmental 9 benefit for the school, as well as the judgmental piece. 10 At the point you get to the kind of situation you 11 had in early 2013 with all those people, that second 12 part has gone out of the window, it is purely about 13 investigation, and so there is a slightly different 14 thing happening at that point, although the things were 15 called inspections, but it was a different thing. 16 MS SCOLDING: It was a different beast? 17 MS SPIELMAN: Yes. 18 MS SCOLDING: In the June 2013 inspection, what they did 19 find was that the governance was inadequate, and 20 obviously, we have talked a little bit about that in 21 particular, but that they were going to appoint some 22 women and some with special educational needs 23 experience. 24 What was surprising was that they hadn't -- they 25 didn't already have those sorts of people. Does this,</p> <p style="text-align: center;">Page 78</p>
<p>1 again, tell us something slightly different about 2 governance, which is, certainly within the independent 3 sector, it may well be -- sometimes it can be a bit of 4 a cosy club of everybody is sort of friends with each 5 other and there is not necessarily a reflection of the 6 sort of expertise you might need, especially in the 7 context of special schools, where -- I don't know 8 whether I am right, but I would imagine that you would 9 need to know a bit about the sorts of children you took 10 and the sorts of needs they had and what you would be 11 looking at. Ms Humphreys or Ms Spielman? 12 MS SPIELMAN: With governance, this is a more general 13 problem, getting the balance between governors in the 14 sense of being the controllers of a school with the 15 ultimate decision making responsibility and governors as 16 representatives of users and particular interests, and 17 governors as experts with the ability to scrutinise 18 particular aspects of what is going on. 19 It is in the context of state institutions, where 20 there are some constraints around the composition of 21 governing bodies that are designed to make sure each of 22 those is to some extent addressed, we have got some 23 controls and, in the context of independent schools, 24 very much less. 25 MS SCOLDING: Do you think there should be some controls?</p> <p style="text-align: center;">Page 79</p>	<p>1 So there should always be, in a special school, somebody 2 who has some sort of background in SEN or there should 3 always be somebody who understands governance or is that 4 impossible, am I asking the impossible practically, 5 because -- 6 MS HUMPHREYS: We do come across excellent governing bodies 7 where you will have people who are perhaps retired, 8 teachers from SEN schools, you nearly always will find 9 a governor now who has responsibility for safeguarding. 10 MS SCOLDING: They are all meant to have, but there should 11 be a safeguarding governor. 12 MS HUMPHREYS: Yes. 13 MS SPIELMAN: I think the change in the composition of the 14 school clearly wasn't reflected in changes in the 15 composition of the governing body to really help them 16 understand what they had taken on and what they had 17 become. There is clearly a sort of pattern, a sort of 18 pattern of decay -- decay/deterioration that is 19 reflected here. 20 MS SCOLDING: Right. 21 And so, as a result of all of this, obviously 22 Sir Michael Wilshaw, your predecessor, Ms Spielman, 23 undertook -- there was a kind of drains-up review 24 I think would be the way I would describe it. 25 MS SPIELMAN: Yes.</p> <p style="text-align: center;">Page 80</p>

<p>1 MS SCOLDING: We have a copy of that at OFS005099, please, 2 Ralph. 3 Now, I don't think I need to take you through it, 4 because I think, actually, during the course of the 5 questioning already, we have sort of identified the 6 difficulties, but just to recap, what it basically found 7 was the inspections were not good enough, the complaints 8 had been handled wrongly, the systems for providing 9 information to inspectors were defective, there were 10 gaps in the leadership of safeguarding within Ofsted, 11 quality assurance was not rooted in evidence and the 12 information sharing was not good, there wasn't any clear 13 protocol about what should be shared between the LADO, 14 who was responsible for referrals, those sorts of 15 things. 16 Now, there were ten recommendations made, which you 17 set out in your report and, in fact, within your witness 18 statement at OFS011578_018 to _019, please, Ralph. 19 So I am going to -- it is slightly easier for me to 20 do it this way than within the review report, so what 21 I really want to know -- can we go to 34, please, Ralph, 22 and could you get up A and B. 23 So "Social care work be restructured with a stronger 24 focus". What does that mean and has it happened? 25 MS HUMPHREYS: Yes, it has happened. So, in 2014, well</p> <p style="text-align: center;">Page 81</p>	<p>1 prior to 2014, Ofsted moved to a regional structure with 2 eight regions managed by a regional director and social 3 care joined that regional structure in February 2014. 4 So there is far more local management of inspection 5 in that particular region. 6 MS SCOLDING: Systems. There should be a proper system 7 for -- 8 MS HUMPHREYS: So we have a new database system, yes. 9 MS SCOLDING: Again, my heart is singing at the word 10 "database", we only need "record keeping" and we will 11 have the whole triumvirate of excitement. 12 Can we go to the next page, "Processes". Basically, 13 the complaints process should be completely redesigned. 14 Has that happened? 15 MS HUMPHREYS: Yes. 16 MS SCOLDING: Next, "Disciplinary action and learning and 17 development"; did that take place? 18 MS HUMPHREYS: Yes, it did. 19 MR FRANK: Yes. 20 MS SCOLDING: Most importantly, "Quality assurance". It 21 seems to me, that is what comes out of this. What has 22 been done to strengthen quality assurance? 23 MS HUMPHREYS: So, in social care, we have devised quality 24 standards for all our social care processes from 25 inspection, reports, evidence-based reviews,</p> <p style="text-align: center;">Page 82</p>
<p>1 registration and our complaints enforcement work, and 2 managers are required to assess -- well, assess against 3 the quality standards and produce reports. 4 We have a quality assurance system where every -- so 5 every inspector, when they start with us, they go 6 through a period of probation and, before they can be 7 a lead inspector, they have to have what is known as 8 a sign-off inspection where their manager would go out 9 and observe them inspecting. If an inspector moves to 10 inspect a different remit, for example, schools or 11 fostering/adoption, they have to attend relevant 12 training and, again, they have to have a sign-off 13 inspection. 14 The quality assurance reports are gathered together 15 and that informs our development plan for training and 16 development. 17 MS SCOLDING: Right. 18 Can we go to the next series of recommendations, 19 please, Ralph: 20 "The cross-Ofsted safeguarding group should be 21 re-established." 22 Does that still exist? 23 MS SPIELMAN: It does. 24 MS SCOLDING: What is its job, roughly? 25 MS SPIELMAN: Its job is to ensure that we have a coherent</p> <p style="text-align: center;">Page 83</p>	<p>1 approach, and high-priority approach, to safeguarding 2 right across our work, in both education and social care 3 and that we properly understand all the implications and 4 take those through our frameworks, our training, our 5 inspection practice and that we surface difficulties, 6 issues, that those are discussed across -- between the 7 regions and the policy teams, so we have the best 8 possible sort of iterative loop to making sure we stay 9 on top of everything that we need to do here. 10 MS SCOLDING: Then "Ensuring secure practice", you went back 11 and looked at where all concerns -- 12 MS HUMPHREYS: We looked back at every complaint that had 13 come into Ofsted in the previous two years, we also 14 reviewed boarding school inspection reports where they 15 had been consistently "outstanding", to see if those 16 judgments were safe. 17 MS SCOLDING: And performance management as well, the 18 previous approach was to be reviewed, et cetera, 19 et cetera. That, again, is a sort of personnel issue, 20 and has that been implemented as well? 21 MS HUMPHREYS: It has. 22 MS SCOLDING: That is fine. 23 I think I have dealt with -- I am not going to deal 24 with any other schools in as much detail, but I think it 25 has been helpful to go through that chain to see the</p> <p style="text-align: center;">Page 84</p>

<p>1 difficulties that there are, and that there have been, 2 with Ofsted, with various inspections. 3 I would now like to turn to Chelfham Mill which 4 is -- again, it was an independent special school and 5 a children's home, which closed in 2015. It was closed 6 in 2015 as a result of emergency intervention by 7 yourselves and the DfE. 8 As I understand it, this was the first time that you 9 had used -- you had some new powers, I think, under the 10 2008 Act, was it, which had given you emergency powers 11 to shut things down where things were not good enough? 12 MS HUMPHREYS: We could issue a notice of emergency 13 suspension and we could also restrict as well; that 14 means restrict how many children can be admitted into 15 the children's home. 16 MS SCOLDING: Really, why this is interesting is, firstly, 17 because you use emergency powers, but, secondly, again, 18 we are looking in particular about information sharing 19 between inspectorates and information sharing between 20 yourselves and the local authority. 21 So, firstly, Chelfham Mill would have been 22 inspected, in fact all schools, the children's home 23 element and the boarding element would have been 24 inspected by four different institutions between 2000 25 and 2008.</p> <p style="text-align: center;">Page 85</p>	<p>1 So 2000 to 2002, the local authority, 2002 to 2004 2 I think the CSCI or was it the NC -- 3 MS HUMPHREYS: NCSC. So children's homes under the 4 Children Act were then inspected by local authority 5 inspection units. 6 MS SCOLDING: Yes. 7 MS HUMPHREYS: 2002, the creation of NCSC; 2004, creation of 8 CSCI; and then, in 2007, children's work was moved to 9 Ofsted. 10 MS SCOLDING: That is an awful amount of change in the 11 system going on. Do you, therefore, think that 12 standards may have slipped during that period of time 13 because everybody was trying to work out which hat they 14 were wearing and which organisation they were working 15 for? 16 I understand you, Ms Humphreys, came from the local 17 authority and then you have been in all of those 18 institutions, so maybe this is more not Ofsted's view 19 but your view, your personal view, as an individual? 20 Did it, therefore, mean there was lots of focus on 21 organisational restructuring and not as much focus as 22 there should have been on inspection? 23 MS HUMPHREYS: So in the local authorities, there was very 24 little control -- most local authority inspection -- in 25 fact, all local authority inspection units were set up</p> <p style="text-align: center;">Page 86</p>
<p>1 to deal with adult care, under the Registered Homes Act, 2 that was the birth of the inspection units, and then, in 3 1989, with the Children Act, local authorities had 4 children's work, but it varied enormously as to whether 5 they actually employed a specific specialist children's 6 inspector or whether the provision was so small in 7 a particular area of children's provision that, 8 actually, the adult inspectors would inspect children's 9 homes. 10 Also, the thing was there was no particular 11 guidance. So local authority inspection units made up 12 their own arrangements as to frequency -- 13 MS SCOLDING: So it was completely variable as to how often 14 people went in, what they found, what they looked at? 15 MS HUMPHREYS: What they found, what you did, how long you 16 were there for. 17 MS SCOLDING: That was the situation until 2002? 18 MS HUMPHREYS: Yes. So in 2002, on the back of an adult -- 19 a crisis in adult care -- and the name just escapes me 20 at the moment. 21 MS SCOLDING: Yes. 22 MS HUMPHREYS: Not dissimilar to Winterbourne and all those 23 others we have heard about, it was the creation of the 24 National Care Standards Commission and that brought all 25 the adult and children's work into -- and, at the time,</p> <p style="text-align: center;">Page 87</p>	<p>1 health as well, into NCSC. 2 MS SCOLDING: Yes. 3 MS HUMPHREYS: Both NCSC and CSCI, the majority of the work 4 that those bodies did was with adult care. 5 Children's care, by the very nature of it, was 6 a small part of that work, because -- just to do with 7 volume. 8 MS SCOLDING: Yes -- 9 MS HUMPHREYS: So -- 10 MS SCOLDING: -- there are relatively few children living in 11 residential settings, compared to a much larger number 12 of adults either with learning disabilities, physical 13 disabilities or because they are elderly, who will be 14 living in a residential setting. 15 MS HUMPHREYS: And, obviously, care was also part of the 16 provision. So I worked in an office where there was 17 probably somewhere in the region of 25 inspectors and 18 there was three of us that did children's work. That 19 was the sort of -- and in some offices -- 20 MS SCOLDING: There was not really -- I think what you are 21 trying to tell me -- 22 MS HUMPHREYS: There was not the same focus. 23 MS SCOLDING: -- is there wasn't really an emphasis and here 24 wasn't really a focus on children, as much as children 25 were just an add-on to what might have happened with</p> <p style="text-align: center;">Page 88</p>

<p>1 adults? 2 Okay. So when it then transferred to Ofsted, did 3 that make a difference, in terms of either what was 4 being looked at or the nature of the inspections? 5 MS HUMPHREYS: So we moved into an organisation in 2007 that 6 was also going through a period of change, because at, 7 the same time as we joined Ofsted, the social care 8 people, and again we were a very small number -- also 9 further education and skills moved in as well, so 10 Ofsted, at that time, were having to absorb both -- two 11 inspectorates into their inspectorate, and I think it 12 would be fair to say it took a while for things to 13 settle down in terms of how that was going to work, and 14 we have had various structures in order to get to that 15 place. 16 But the 2014 shift was by far the one that has 17 brought about the most effective change with the eight 18 regions. 19 MS SPIELMAN: Yes, I would pull out two things: the 20 regionalisation, which brings together the senior 21 managers across the remits and promotes the conversation 22 is one very important piece. 23 A second very important piece is actually the work 24 we do through our research evaluation commentaries and 25 the joint working with other inspectorates that</p> <p style="text-align: center;">Page 89</p>	<p>1 underlies that. We have built a programme of work that 2 helps us think about the issues affecting children in 3 all different contexts, which often cut across 4 particular types of provision and are really helping us 5 feed back into how we carry out our formal 6 responsibilities in each of these and to have the 7 joined-up conversations. 8 So I think it is fair to say it has taken us a while 9 to fulfil the benefit of what was intended when the 10 different inspectorates, effectively, with 11 responsibilities for children were merged, but I think 12 we are really seeing that come through now. 13 MS SCOLDING: Okay. 14 MS HUMPHREYS: As a way of example, if the Stanbridge Earls 15 complaint came in now, that would go to the regional 16 director, who would have conversations with their senior 17 HMI for both education and social care and together 18 would work out what the plan is going to be, so that 19 there would be no falling in between gaps. 20 MS SCOLDING: I am going to now -- what we are going to do 21 is look at what did happen in 2012, where there was 22 a little bit of gap falling between. That was within 23 Ofsted itself -- 24 MS HUMPHREYS: Yes. 25 MS SCOLDING: -- because this particular organisation was</p> <p style="text-align: center;">Page 90</p>
<p>1 inspected by Ofsted both for its school and for its 2 children's homes, so it is one organisation inspecting 3 both. 4 MS HUMPHREYS: Yes, so we have to remember this was 5 a residential special school that was also registered as 6 a children's home. 7 MS SCOLDING: Yes, but it would have been Ofsted who 8 inspected both of it. 9 Now, you inspected the children's home, the 10 children's home element was inspected, not you 11 personally, Ofsted did, and it was only rated as 12 adequate in 2012. In particular, it was identified that 13 the statutory standards were not met regarding abuse, 14 restraint, physical intervention and reporting child 15 abuse, and in particular there was a recommendation 16 regarding restraint which hadn't been acted upon from 17 the last inspection, and that there were significant 18 problems that were found at that stage with physical 19 intervention and risk, and in particular that the 20 children's home was not reporting things to the LADO, 21 which they should have done. So, in fact, they told the 22 inspector they would only report things to the LADO if 23 there was an actual injury, rather than a risk of 24 injury, which is kind of worrying. 25 But you say it was quite common in 2012 that things</p> <p style="text-align: center;">Page 91</p>	<p>1 wouldn't get reported to the LADO, unless somebody had 2 actually been injured. 3 MS HUMPHREYS: Yes, I think the LADOs had not been in place 4 that long at this time. I mean, they had been around 5 since 2007, but they were not around that long. There 6 was still, I think, a lack of understanding around what 7 should get reported to the LADO or not and some LADOs -- 8 and this was one, and I am definitely aware of another 9 one where the LADOs sort of discouraged reporting, or 10 created a threshold and said, "Instead of having 11 an arrangement where I want to hear about everything, we 12 will talk about it and I will tell you if it meets my 13 threshold". There was an artificial threshold created 14 and schools were advised not to refer anything unless it 15 met this artificial threshold. 16 MS SCOLDING: Okay, but I am just identifying that, despite 17 the fact there were all those quite serious issues, the 18 children's home was still rated as adequate. I mean, 19 was that right? 20 MS HUMPHREYS: It was right for the time because what the 21 inspector did was focus on, as well, the outcomes for 22 children, which on paper looked very good. 23 MS SCOLDING: How can you have very good outcomes for 24 children when they are being subject to physical 25 restraint on a regular basis?</p> <p style="text-align: center;">Page 92</p>

<p>1 MS HUMPHREYS: If you read the section in the report about 2 outcomes, these were children who previously had not 3 been going to school, were now going to school, children 4 who had been missing, weren't now going missing, they 5 were having good contact with the school -- 6 MS SCOLDING: If I can just identify, Chelfham Mill, I don't 7 think we have identified it properly, it was a school 8 for children with emotional, social and behavioural 9 difficulties, so they had all come from -- some of them 10 were looked-after children, some had been placed by 11 local authorities, they were largely children who had 12 had damage, trauma and abuse in their lives. 13 MS HUMPHREYS: Yes, so these were children who appeared on 14 paper to be making extreme progress. 15 What became clear later, and perhaps wasn't 16 investigated enough at this inspection, was, how were 17 those children making progress. Actually, what we know 18 now is that they were subject to restraint and other 19 inappropriate practices and that there was 20 an environment and a culture which was very controlling. 21 MS SCOLDING: But again, what you identify in your witness 22 statement about that 2012 report is that the standards 23 at the time said it is only if there had been any harm 24 that you would judge something to be inadequate and in 25 this case, I don't think anybody was saying that any</p> <p style="text-align: center;">Page 93</p>	<p>1 harm had in fact come to any of the children. 2 MS HUMPHREYS: Although we know it had. 3 MS SCOLDING: Although, in fact, we know it had and there 4 had been concealment of that, but, in fact, because 5 there was only the risk of harm, despite clear 6 identification of some very worrying practices, nothing 7 was going on. Perhaps you would like to comment upon 8 that? 9 MS HUMPHREYS: Yes, and the difference how is, if we 10 consider children may be at risk, then that would be 11 meeting the threshold for "inadequate". 12 The other difference is that, there was restraint 13 happening in schools, but the school was, at that time, 14 and is still, allowed to rely on the DfE guidance "Use 15 of reasonable force to maintain good order", and schools 16 can allow any member of staff, not just teachers, any 17 members of staff, to use reasonable force to maintain 18 good order, whereas in the children's home, they would 19 have to comply with Children's Home's Regs, which is 20 a different threshold. 21 MS SCOLDING: How does that make any sense at all in the 22 context of a school like this? So you have got the 23 children's home and the school where the same children 24 appeared, you have got the same owner/proprietor -- and 25 we'll talk in a little bit -- and --</p> <p style="text-align: center;">Page 94</p>
<p>1 MS HUMPHREYS: Same staff. 2 MS SCOLDING: -- the same staff working in both settings, 3 but yet, within the children's home, they cannot 4 physically restrain or there are certain circumstances 5 in which you can. 6 MS HUMPHREYS: To meet the threshold in the regulations. 7 MS SCOLDING: There are various thresholds and in schools 8 I think this is something the DfE are probably working 9 on in the light of development of the deprivation of 10 liberty safeguards generally, but in the schools they 11 could restrain and, so long as it was reasonable, that's 12 the only measure. 13 MS HUMPHREYS: Use of reasonable force, but it is also 14 a different criteria because they can use it to maintain 15 good order, whereas in children's home, you would only 16 restrain -- 17 MS SCOLDING: If it was a risk? 18 MS HUMPHREYS: Risk, absolutely. 19 MS SCOLDING: If it was a risk to that person or to somebody 20 else. 21 MS HUMPHREYS: Or to others, yes, and it needs to be 22 proportionate and for the shortest period of time. 23 MS SCOLDING: The criteria for physical restraint in schools 24 is, arguably, not high enough? 25 MS HUMPHREYS: It is not as rigorous as it is in children's</p> <p style="text-align: center;">Page 95</p>	<p>1 homes. 2 MS SCOLDING: Particularly in the context of residential 3 special schools and these sorts of pupils where you 4 might have restraint commonly and possibly necessarily 5 it is particularly important, I would imagine, to make 6 sure that the boundaries and the guidance are absolutely 7 clear about what you can do when. 8 MS HUMPHREYS: Yes, so the NMS that talks about behaviour 9 management relies heavily on the use of reasonable 10 force. It doesn't supply any other guidance other than 11 use of reasonable force and, if we were in a residential 12 special school and we felt there was -- and we have -- 13 we found there was excessive use of restraint, then our 14 remedy is to refer that back to the DfE. 15 If we found use of excessive restraint in 16 a children's home, then our remedy is Children's Homes 17 Regs, and we could raise a requirement and, if we were 18 extremely concerned about it, we may even go as far as 19 to suspend that service because we felt children were 20 not safe. 21 MS SCOLDING: And even somewhat more extraordinarily, in 22 2012, the school was also subject to an inspection and 23 I am assuming -- I can but assume -- those same issues 24 which were raised in the children's home were raised in 25 the school, and it got a rating of "good". Is there any</p> <p style="text-align: center;">Page 96</p>

<p>1 explanation for that?</p> <p>2 MS HUMPHREYS: The explanation that we found is that the</p> <p>3 same, although they were the same children, most of the</p> <p>4 incidents were happening in the children's home and not</p> <p>5 in the school, and so there wasn't the crossover that</p> <p>6 there should have been to say hang on a minute, this is</p> <p>7 the same person who owns both the school and the</p> <p>8 children's home.</p> <p>9 MS SPIELMAN: If I can add to that, the education inspection</p> <p>10 will also be looking at what is taught, how it is</p> <p>11 taught. A whole different set of outcomes.</p> <p>12 MS SCOLDING: Yes.</p> <p>13 MS SPIELMAN: The outcome of the inspection is a judgment</p> <p>14 based on taking into account all the different things</p> <p>15 that are inspected, so it is possible that something</p> <p>16 that -- that this aspect of the school could be the</p> <p>17 weakest part of it, viewed as a school on the education</p> <p>18 framework, but still, in the view of the inspector, be</p> <p>19 most fairly, on a best fit judgment, be represented as</p> <p>20 "good" overall, notwithstanding that this aspect was</p> <p>21 weaker.</p> <p>22 So there is nothing -- there is nothing</p> <p>23 intrinsically automatically wrong about the fact that</p> <p>24 the provision under the ultimate control of the same</p> <p>25 people has different judgments.</p> <p style="text-align: center;">Page 97</p>	<p>1 MS SCOLDING: You can understand --</p> <p>2 MS HUMPHREYS: And both inspections focused --</p> <p>3 MS SCOLDING: Sorry, Ms Humphreys. From the lay person,</p> <p>4 from the person that doesn't understand, that seems,</p> <p>5 well, absurd, if I may comment.</p> <p>6 MS HUMPHREYS: And the other thing is, on paper, children,</p> <p>7 the outcomes for children, both in their education and</p> <p>8 in their social emotional development appeared good.</p> <p>9 MS SCOLDING: Right. Okay.</p> <p>10 That is -- but what this does is it also raises</p> <p>11 an issue of the fact of the LADO not referring things,</p> <p>12 and the LADO not telling you about things --</p> <p>13 MS SPIELMAN: Yes.</p> <p>14 MS HUMPHREYS: Absolutely.</p> <p>15 MS SCOLDING: -- which raises a number of issues which we</p> <p>16 have dealt with in a number of schools. Firstly, LADOs</p> <p>17 are under no compulsion to tell you about things, are</p> <p>18 they?</p> <p>19 MS HUMPHREYS: That's right.</p> <p>20 MS SCOLDING: Certainly not about schools, and, secondly,</p> <p>21 schools are no longer under any duty to notify you of</p> <p>22 serious incidents.</p> <p>23 MS SPIELMAN: Indeed. There are many weaknesses at the</p> <p>24 moment in the sharing of information around the system</p> <p>25 and to come back to a general point about inspection, it</p> <p style="text-align: center;">Page 98</p>
<p>1 is predicated on the integrity of the leadership of</p> <p>2 a school or any other kind of provider, it therefore --</p> <p>3 therefore, if a LADO or a local authority has any reason</p> <p>4 to doubt the integrity of the leaders and managers,</p> <p>5 then, if we are not informed of that, it puts us on the</p> <p>6 back foot and makes it much, much harder to adapt what</p> <p>7 we do to contemplate the possibility, the possibility</p> <p>8 that things may be being concealed from us.</p> <p>9 So it is very important that this integrity extends</p> <p>10 around the system to communicating -- to notifications</p> <p>11 and communicating concerns.</p> <p>12 MS SCOLDING: Now, do you think, therefore, there should be</p> <p>13 an obligation upon the LADO? Because you will ask the</p> <p>14 LADO for information before an inspection. Do you think</p> <p>15 there should be some form of obligation on LADOs to</p> <p>16 provide you with pre-inspection information?</p> <p>17 MS SPIELMAN: I think the inconsistency of what we have seen</p> <p>18 from different LADOs -- and I don't think anybody is</p> <p>19 suggesting this particular LADO is representative of the</p> <p>20 entire cast --</p> <p>21 MS SCOLDING: I think you had identified separately through</p> <p>22 Children's Services that you had concerns about the</p> <p>23 LADO.</p> <p>24 MS HUMPHREYS: But I think there was a weakness, definitely.</p> <p>25 MS SPIELMAN: I think we would like to be sure that we</p> <p style="text-align: center;">Page 99</p>	<p>1 receive the relevant notifications that have come to the</p> <p>2 LADO.</p> <p>3 MS SCOLDING: Okay. The second issue is about serious</p> <p>4 incidents, particularly in the context of a school</p> <p>5 setting and incidents around physical restraint.</p> <p>6 Obviously, before 2011, those would have been notified</p> <p>7 to you and, in fact, in the paperwork, which I am not</p> <p>8 going to take you to because we would be here for about</p> <p>9 three days, there are numerous incidents of serious</p> <p>10 incidents being reported to you, pre-2011, by the</p> <p>11 schools.</p> <p>12 MS SPIELMAN: Yes.</p> <p>13 MS SCOLDING: Do you think that is something which is</p> <p>14 worthwhile reinstating?</p> <p>15 MS SPIELMAN: I think we do, yes. And it is something we do</p> <p>16 receive for children's homes and it is an important</p> <p>17 source of risk information for us that helps us to</p> <p>18 prioritise and direct our work.</p> <p>19 Complaints information is actually also</p> <p>20 an important -- it is an important source for us and one</p> <p>21 of difficulties we have with independent schools is that</p> <p>22 we are not the place to which complaints come, they only</p> <p>23 go to DfE and they notify us essentially only if they</p> <p>24 want an action on the outcome of the complaint. So the</p> <p>25 accumulation of lower-level complaints, that don't</p> <p style="text-align: center;">Page 100</p>

<p>1 justify -- in themselves justify an intervention, is not 2 visible to us. So maximising the flow of that risk 3 information -- 4 MS SCOLDING: You would say that serious incidents, in the 5 way they used to be characterised in 2011, which was, 6 you know, illness -- basically, contagious disease -- 7 MS HUMPHREYS: I am not sure we need to know about that. 8 MS SCOLDING: Fine. Who knows? 9 MS HUMPHREYS: It used to be in Children's Home Regs but it 10 was taken out because -- 11 MS SCOLDING: Times have changed? 12 MS HUMPHREYS: Times have changed, absolutely. 13 MS SCOLDING: Risk of injury, really, allegations of abuse, 14 physical harm, emotional harm, all of those would be 15 reported to you and you would welcome that, would you, 16 that system being reintroduced? 17 MS SPIELMAN: We would welcome reinstatement of reporting, 18 obviously making sure it is the right set and calibrated 19 to current circumstances. It would be helpful. 20 MS SCOLDING: Not whether there is an outbreak of measles, 21 which would be the case if you were to reintroduce the 22 contagious diseases element of it. 23 We have then got another inspection in 2013, which 24 was still saying it was adequate and in June 2013, 25 again, it is said that the safeguarding was --</p> <p style="text-align: center;">Page 101</p>	<p>1 safeguarding children and leadership and management was 2 inadequate, but it was still given an overall rating of 3 "adequate". Again, Ms Humphreys, would you assist me 4 about how that could have been? 5 MS HUMPHREYS: Again, when you read the report, this is, 6 again, because focus was on the outcomes for children 7 and that still presented as good. The same matters are 8 being reported again, that children are making progress, 9 children are doing this, children are doing that. 10 MS SCOLDING: Even though they didn't have procedures to be 11 compatible with runaway or missing children, they 12 weren't considering the views of young people, the use 13 of physical intervention was high without justification 14 and the staff were looking after pupils in the home who 15 were less than four years older than the oldest person 16 in residence? 17 MS HUMPHREYS: Yes. 18 MS SCOLDING: Again, is that a judgment which should have 19 been reached on the basis of the difficulties? 20 MS HUMPHREYS: It was a judgment that fitted the framework 21 at the time. It wouldn't be a judgment that would be 22 reached now. 23 MS SCOLDING: Right. 24 So then, you did have concerns in 2013/2014, and 25 there we have seen internal correspondence which</p> <p style="text-align: center;">Page 102</p>
<p>1 identifies that everyone was very uncomfortable about 2 what was going on at this school but nobody did anything 3 about it until June 2015, when everything exploded and 4 it was then closed within a two-month period. 5 MS HUMPHREYS: March 2014, we judged inadequate progress and 6 we served two compliance notices. Again, that was quite 7 significant at the time. We serve lots of compliances 8 notices now, but, in 2014, that was slightly different 9 and we also introduced a new inspection framework in 10 2014 as well, as sort of like a -- it wasn't the social 11 care common inspection framework, but there was a shift 12 in the way that we inspected. 13 MS SCOLDING: Isn't serving a compliance notice in these 14 sorts of situations a bit of a paper tiger, really? 15 MS HUMPHREYS: Not necessarily. A lot of providers take 16 notice of a compliance notice. Failure to comply with 17 a compliance notice, actually we can prosecute, but we 18 also can use it as grounds for cancellation, a failure 19 of a compliance notice, and it would also mean that if 20 we served a compliance notice, then we would have reason 21 to go back in, usually -- usually -- six weeks later, 22 but it can be a shorter period of time. 23 MS SPIELMAN: Can I make a wider point here, which is, first 24 of all, we are obliged, as regulators, to be 25 proportionate, and we must also remember that our most</p> <p style="text-align: center;">Page 103</p>	<p>1 serious remedies, and we do have a very good range of 2 remedies in relation to children's homes, but suspension 3 and cancellation both necessitate the immediate removal 4 of all the children living there, which is highly 5 disruptive. So it is appropriate for us to, where 6 possible, bring an organisation into compliance without 7 disrupting children's lives to that extent. 8 MS SCOLDING: But as you identify in your witness 9 statement -- and I can't remember which one, 10 Ms Spielman -- you have identified the power has gone 11 from being used rarely, like on one or two occasions, to 12 being used 25 or 30 times a year. 13 MS SPIELMAN: We use it much more frequently and I am very 14 happy that the team has the confidence, which I think 15 has been built from a -- over a few years, to really use 16 these powers well. 17 MS SCOLDING: Do you think, at this time, there was not the 18 confidence to sit there and think: look, we really need 19 to do something about this, we need to -- 20 MS HUMPHREYS: Absolutely, we hadn't been tested, because if 21 we issue a notice to suspend, the provider can appeal 22 that suspension and can take us to a tribunal. 23 At that point, we hadn't been in tribunal. We 24 didn't know the test. 25 MS SCOLDING: Yes.</p> <p style="text-align: center;">Page 104</p>

<p>1 MS HUMPHREYS: We have been to tribunal now and we have won 2 every tribunal that we have been to, and we now feel far 3 more confident in using our powers and that the test 4 that we use is appropriate. 5 But even though we are using our powers more, that 6 is not to say that we are just using them without 7 thought. As Amanda said, you know, it is traumatic for 8 children to be removed from their home and we have to 9 weigh that up in terms of which is the greater risk, the 10 disruption to these children who are now going to have 11 to be found, very quickly, somewhere else to live, or is 12 the risk so great that, actually, they cannot safely 13 live there. 14 MS SCOLDING: Right. Can I also identify that when the 15 school was finally closed in July 2015, you took action 16 to suspend the registration, the DfE took action shortly 17 afterwards, but what was found was the police were 18 involved by that stage because there were criminal 19 allegations. They executed a warrant and found sort of 20 boxes of cabinets of problems, kind of in people's 21 homes, in cellars, all over the place, there had been 22 a lot of documents which had been deliberately hidden, 23 identifying problems, including problems with all sorts 24 of abuse. 25 Over the years.</p> <p style="text-align: center;">Page 105</p>	<p>1 Does that maybe identify, firstly, did Ofsted's 2 practice change as a result of finding out that things 3 had, in effect, been hidden from them during the course 4 of inspections? 5 MS HUMPHREYS: I think the first thing it did was introduce 6 the notion that providers cannot be trusted. I think, 7 up to that point, we had sort of always assumed, if 8 a provider tells you something, that, then -- unless you 9 can find evidence to disprove it, then it must be true. 10 I think there was probably a difference in questioning 11 in terms of, "So, can you tell us about any referrals 12 that you have made, Children's Services referrals that 13 you have made?", as opposed to, "Can you show us all the 14 child protection and safeguarding concerns that you have 15 had since the last inspection and, in particular, show 16 us the ones where you have decided not to take any 17 action and what was the rationale for that?". 18 MS SCOLDING: I understand, for example, you gave an example 19 of now where somebody did find something, because they 20 now follow the people to their cabinets to check to make 21 sure things are not being hidden; is that right? 22 MS HUMPHREYS: Yes. 23 MS SCOLDING: One of the other issues raised here is whether 24 or not there needs to be the introduction of a duty of 25 candour, so proprietors and individuals involved with</p> <p style="text-align: center;">Page 106</p>
<p>1 the running of a school should have to, you know, be 2 full and frank, and this something that the Independent 3 Schools Inspectorate have recommended. Do you have any 4 particular views about that? 5 MS SPIELMAN: I would share the view of the Independent 6 Schools Inspectorate here. I think this dependence that 7 inspection has on the integrity of the school means 8 that, without that candour, it cannot function as it 9 should. 10 It is -- I don't think, sorry, I am starting from 11 slightly the wrong place here. 12 MS SCOLDING: Yes. 13 MS SPIELMAN: But the -- we have -- across many areas of our 14 work, we have -- we are working in legal frameworks that 15 assume that everybody intends to act honestly and 16 well -- 17 MS SCOLDING: Yes. 18 MS SPIELMAN: -- and that they differ only in levels of 19 competence. 20 MS SCOLDING: Yes. 21 MS SPIELMAN: What we have seen, regrettably, over the last 22 few years, in a number of areas of our work, and for 23 a number of reasons, is deliberate non-compliance and 24 sometimes, where people have been unable to manage and 25 sort of hiding -- sometimes people coming into running</p> <p style="text-align: center;">Page 107</p>	<p>1 a home or a school with the intention of not doing it as 2 they should. 3 So we are increasingly having to face these issues 4 and think about how and where our work needs to adapt. 5 The work that we have been doing with unregistered 6 schools, looking at and reporting on unregistered 7 schools and taking some of those to successful 8 prosecutions, I think has really forced us to think 9 about how we deal with the issues where integrity breaks 10 down, but the duty of candour to help push everybody who 11 is intending, who is broadly intending -- intending to 12 operate properly, that they cannot just breathe a sigh 13 of relief if we don't ask a question that exactly hits 14 the spot, that they have that obligation to be honest 15 with us, to be honest and complete with us, I think is 16 important. 17 MS SCOLDING: One of the other issues that was raised here 18 is about the fact that it was identified that the 19 particular individual who ran the school was very 20 charismatic, and it was found afterwards that she had 21 sort of pulled the wool, in effect, over a number of 22 people's eyes over a number of years, and she was, 23 again, an owner/proprietor. Are there particular issues 24 that you have found, and I think you may largely 25 inspect -- you inspect non-association special schools,</p> <p style="text-align: center;">Page 108</p>

<p>1 and that may well be a significantly larger proportion 2 of the owner/proprietor market, so to speak. 3 Are there particular issues with owner/proprietors, 4 where there is no governing body, there is no need for 5 any parent representation, you know, they run their own 6 show? 7 MS SPIELMAN: I think there are, my comments here are based 8 on our work with all kinds of independent schools, not 9 narrowly special schools, I should say. 10 MS SCOLDING: I think this is a more general issue, this is 11 not just an issue in the special school sector, it is 12 an issue in the independent sector generally. 13 MS SPIELMAN: I think we are seeing and -- both in existing 14 schools and in applications for registration, people who 15 it is hard to see really have the kind of expertise and 16 whose reasons for running the school are uncertain, and 17 where it is not clear that they, alone, are in total 18 control of the school or whether there are one or more 19 other institutions or individuals who are involved. 20 One example is an independent school we have seen 21 recently, where -- which is a fee paying school, but 22 where the fees are so low that it seems implausible that 23 the school could anywhere near be sustaining its costs 24 even if it only paid all its teachers minimum wage. 25 So it is not just narrowly about the proprietor, it</p> <p style="text-align: center;">Page 109</p>	<p>1 is about proprietors, directors, and people -- whoever 2 is exerting some kind of controlling influence on what 3 happens there. 4 MS SCOLDING: Do you think, therefore, does that raise 5 a large question about who is allowed to become 6 a proprietor of a school, about registration with the 7 Department for Education? 8 MS SPIELMAN: It does and I think, historically, this 9 presumption of good faith on the part of applications 10 for registration has made the broadly sort of permissive 11 approach to independent schools in this country fair and 12 reasonable. I think we are seeing enough cases that 13 cause us concern, that I -- I would very much like to 14 see a real stiffening, both in the breadth of people who 15 are contemplated as being within the scope of the 16 scrutiny for their fitness to be involved in independent 17 school, and also in keeping people on there when they 18 have slipped up in some way, whether we should be 19 sterner in taking a view on who shouldn't be there. 20 Again I can give an example, if you would like -- 21 MS SCOLDING: Yes, please. 22 MS SPIELMAN: -- of an independent school where the head, 23 who I believe is married to somebody who was the 24 proprietor, though may no longer be the proprietor, is 25 barred from teaching but is still permitted to carry on</p> <p style="text-align: center;">Page 110</p>
<p>1 being the head. 2 The expectation is that she will not go into 3 individual classrooms, but I find that bizarre, frankly 4 bizarre. 5 MS SCOLDING: Which raises another issue which the 6 Independent Schools Inspectorate have found, which is, 7 in fact, that owner/proprietors might not need regulated 8 checks because they might not be, unless they are going 9 to be involved in teaching, even though they might be 10 running a school and exerting the most influence, 11 because they might not be there on a day-to-day basis -- 12 MS HUMPHREYS: They are not in regulated activity. 13 MS SCOLDING: Yes. Okay. This raises a more general point, 14 Ms Spielman, which you identify in your witness 15 statement, which is the concerns you have about the 16 expedition of Department for Education action because it 17 all sorts of runs into the same thing, would you like to 18 tell us a little about that, please? 19 MS SPIELMAN: I think this has been, in my time as chief 20 inspector, a bit of a perennial issue from our 21 perspective, in that we inspect -- we report, often, on 22 significant concerns in a range of independent schools, 23 and it often appears that there is considerable 24 reluctance to take that through into any kind of 25 regulatory action, or, at most, to require an action</p> <p style="text-align: center;">Page 111</p>	<p>1 plan from the school which they may or -- they may make 2 some progress on, but which still doesn't bring the 3 school to where it should be. I think in the worst 4 cases we have got schools which have been non-compliant 5 for the best part of a decade or close to it. 6 MS SCOLDING: I think, in fact, you have identified 7 30 schools, which you have inspected, where you say it 8 has gone on too long? 9 MS SPIELMAN: Indeed. 10 MS SCOLDING: What do you think should be changed? Do you 11 think they should just be more robust in taking action 12 more frequently, or have you had a discussion -- I think 13 you did send a formal letter, so to speak, to the DfE 14 about this. 15 Ralph, could we get this up: OFS011575. It's 16 paragraph 136. In fact, it's the relevant extract in 17 your witness statement from the letter, so -- no, in 18 fact, it is the letter itself. I apologise. This is 19 a letter you wrote to Maria Miller. Now, why would you 20 have written to Maria Miller about this? Is it because 21 there was a Select Committee event taking place? 22 MS SPIELMAN: It was written by my then strategy director, 23 it followed an appearance at that Select Committee, so 24 it was a follow-up to a question that had been asked in 25 the committee, I think.</p> <p style="text-align: center;">Page 112</p>

1 MS SCOLDING: Okay.
 2 So they said:
 3 "During the session, further information on
 4 enforcement action ..."
 5 Then there is just some general information. Can we
 6 go to the next page, please:
 7 "We inspect independent schools ..."
 8 And here:
 9 "We continue to express concerns ..."
 10 This was a letter written earlier this year,
 11 I think, or last year:
 12 "We continue to express concerns that the DfE are
 13 not taking enforcement action quickly enough ... more
 14 than 30 schools that have been subject to regulatory
 15 action."
 16 Then you said:
 17 "Since 2008, one school has been inspected by Ofsted
 18 nine times. Every time it has been found to be failing
 19 and yet the school remains open."
 20 MS SPIELMAN: That summarises the position very clearly and
 21 we have expressed it, we have expressed it publicly as
 22 well as privately.
 23 I think there is a clear contrast, at present,
 24 between our approach to regulating children's homes and
 25 also nurseries and child minders, we are also the

Page 113

1 quite weary. I probably have about 20 minutes to
 2 30 minutes more questions for Ms Spielman. I was
 3 intending to take those, with your permission, after the
 4 lunch break, and for us to have a slightly earlier lunch
 5 break, if that would be acceptable to you, chair?
 6 THE CHAIR: Yes, we will return at 1.40.
 7 MS SCOLDING: Thank you very much, chair.
 8 Just to remind you both, you are under oath but it
 9 doesn't mean you cannot talk, just not about your
 10 evidence.
 11 MS SPIELMAN: Yes.
 12 MS SCOLDING: Thank you.
 13 (12.40 pm)
 14 (The Luncheon Adjournment)
 15 (1.40 pm)
 16 THE CHAIR: Ms Scolding?
 17 MS SCOLDING: Thank you very much.
 18 I now have some broader general questions that have
 19 arisen from the evidence we have heard over the past
 20 two weeks. Most of these questions, I think, will
 21 probably be for Ms Spielman, but that does not preclude
 22 Ms Humphreys from answering.
 23 The first question I wanted to ask about is whether
 24 or not you, as Ofsted, have any view about educational
 25 gardens or guardianship. We heard something from

Page 115

1 regulator there, and the department as regulator of
 2 schools. I don't think there is a consistency in sort
 3 of regulatory thresholds, perhaps, might be the way of
 4 putting it at the moment.
 5 MS SCOLDING: What would be your solution to that particular
 6 dilemma, from your perspective?
 7 MS SPIELMAN: I would very much like to see the
 8 school-related regulatory thresholds become a bit
 9 tougher and action to be taken much more promptly on
 10 many of these schools.
 11 MS SCOLDING: Does it raise questions about whether or not
 12 the DfE are the right person to regulate these
 13 institutions? Are you putting your hat in the ring to
 14 say you would like to do it, I suppose is the question
 15 I really want to ask?
 16 MS SPIELMAN: We do think we would be well equipped to do
 17 it, with the regulatory functions for so many other
 18 Children's Services already sitting with us. We have
 19 a good understanding of the nature of the work and the
 20 confidence and the expertise and the insight from our
 21 inspection.
 22 Again, there are always many issues in going for
 23 that kind of choice.
 24 MS SCOLDING: Chair, I note the time. I know we had
 25 a significantly earlier break, so I suspect everybody is

Page 114

1 Ms Humphreys about this last week. Does Ofsted have
 2 a view about whether or not there needs to be
 3 a registration or licensing system?
 4 MS SPIELMAN: It is an issue that has been around for a long
 5 time and which we are certainly aware of, because our
 6 responsibilities don't extend beyond schools. It has
 7 not been one of our core areas. But we do have
 8 considerable concerns about children from overseas who
 9 spend a lot of time in this country without any real
 10 oversight of what is happening to them. It feels a bit
 11 of an anomaly to have so much concern for children's
 12 safeguarding in some respects, and not in others.
 13 MS SCOLDING: I think, in fact, the lady from AEGIS, last
 14 Friday, said there was more regulation of doggy day care
 15 than there was in this particular area.
 16 MS SPIELMAN: There are several groups of children here, but
 17 the conversation tends to focus most on the Tier 4 visa
 18 group.
 19 MS SCOLDING: Yes.
 20 MS SPIELMAN: But there are at least two other groups of
 21 children from overseas in boarding schools here, one of
 22 which is British children whose parents happen to live
 23 overseas, who often, but not invariably, have close
 24 family in the UK, and there are also European children
 25 who don't need guardianship arrangements.

Page 116

<p>1 Then, when you look underneath that, the actual 2 level of guardianship, where there is some kind of 3 guardianship arrangement, varies enormously, given some 4 children are off home every half term, every holiday for 5 the duration, so it is just a matter of a few weekends 6 a year and a bit of fallback stuff, all the way through 7 to what is essentially ten-months-a-year care. 8 So it feels as though there is a need to look 9 properly underneath at what is modern guardianship, 10 where is assurance needed, where are the cut-offs? 11 Because something that bedevils everything we do is that 12 nothing is ever neat and tidy, on or off, yes or no. 13 There is a spectrum, but where on this spectrum? 14 So the private fostering definition is potentially 15 one helpful marker. Something that would trigger the 16 definition of a private fostering arrangement ought to 17 be subject -- 18 MS SCOLDING: It should be registered, but I am just 19 thinking about, in your work with children's social 20 care, has this ever been identified as a particular 21 issue that they are worried about, that your local 22 authorities are concerned about? Particularly, I am 23 thinking it is likely to be a big issue probably only in 24 a few authorities, I am thinking mainly those along the 25 south coast, where you have lots of boarding schools and</p> <p style="text-align: center;">Page 117</p>	<p>1 lots of language schools where similar issues might 2 arise. 3 MS SPIELMAN: I don't think it has surfaced in anything that 4 has come to me, but I am going to look at Helen to see 5 if it has surfaced for her. 6 MS HUMPHREYS: On the back of the Victoria Climbié 7 arrangement, who, of course, Victoria was looked after 8 by her great-aunt in a private fostering arrangement, 9 we, at that point in CSCI, and one year in Ofsted, were 10 asked to look at private fostering arrangements across 11 all local authorities and we did that for three years. 12 One of the key issues at the time was it was not 13 particularly clear as to when a private guardian -- 14 educational guardian arrangement fell into private 15 fostering arrangements and different local authorities 16 interpreted it differently in terms of whether they were 17 going to engage or were not going to engage. So again, 18 as Amanda says, it is this anomaly and some clear 19 direction would definitely be helpful in that regard. 20 MS SCOLDING: Because, I mean, my understanding, and it may 21 well be imperfect, is that if you are an educational 22 guardian and you look after a child for more than 23 28 days, you should register with the local authority. 24 That is the advice that AEGIS gives. 25 However, of course, the situation with</p> <p style="text-align: center;">Page 118</p>
<p>1 Victoria Climbié could still happen today, because she 2 was a relative and, therefore, in any event, she would 3 not be registered as any form of guardian. 4 MS HUMPHREYS: She was a great-aunt, that is right. And we 5 do know, although I am not sure I've got the most 6 up-to-date information, there are situations where 7 children will come to this school for language courses, 8 and that sort of thing, and live with families in the 9 community and that will be for 27 days, so it doesn't 10 trigger the private fostering arrangement. 11 MS SCOLDING: In fact, that is congruent with the evidence 12 AEGIS gave us last week, which was that some providers 13 deliberately move children every 27 days in order to 14 avoid having to register. 15 MS HUMPHREYS: The spirit of the legislation is it is the 16 intent to look after this child, not that there is 17 a cut-off date and within 0 to 28 all is well and it 18 only becomes unsafe at 29, it is the intent to look 19 after somebody else's child. 20 MS SCOLDING: Of course, one recognises there have always 21 been significant numbers -- and this is maybe something 22 we will deal with a bit more in phase 2 -- of children 23 who are -- in effect, where their parents live abroad 24 and they receive the Ministry of Defence allowance or 25 the Foreign Office allowance, but obviously the number</p> <p style="text-align: center;">Page 119</p>	<p>1 of international students is now a significant part of 2 the boarding sector in a way it probably wasn't even 3 20 years ago. 4 MS SPIELMAN: Absolutely. 5 MS SCOLDING: Do you think the national minimum standards or 6 the independent schools standards really reflect that 7 change in the diversity of the pupil population? 8 MS SPIELMAN: I think not yet, and perhaps -- I think it is 9 fair to say our safeguarding expectations for children 10 in boarding schools and this wider thinking about the 11 context of children who are coming from overseas, who 12 are physically a long way away from their family, was 13 not fully -- that the current expectations are not fully 14 reflected in those standards, expectations have changed 15 a lot over the last 20 years, as has children's access 16 to various means of technology and communication. 17 There is an important difference for me between 18 thinking about what is needed for children who are 19 absolutely capable and able to communicate with close 20 family very regularly, notwithstanding they are away at 21 school; children who have significant special needs for 22 whom communication is a real challenge, much of which 23 has been aired here; and the group who may be in schools 24 where access to communication is deliberately withheld. 25 MS SCOLDING: Yes.</p> <p style="text-align: center;">Page 120</p>

<p>1 MS SPIELMAN: There are cases where institutions do not want 2 children to be able to reach out of that school -- 3 MS SCOLDING: Even though, as part and parcel of the 4 national minimum standards, and as they currently exist, 5 there is a requirement that children should have sort of 6 free or free-ish access. I am particularly thinking 7 about some sort of faith institutions may well not 8 permit mobile phones for their children. 9 MS HUMPHREYS: Yes, a significant number of the Muslim 10 schools that I'm aware of, children are not allowed 11 mobile phones or tablets or anything. 12 MS SPIELMAN: To give an example from the maintained sector, 13 we reported an academy last year where -- one of the 14 reasons we found the school "inadequate" was because the 15 children had no recourse to anyone beyond the school 16 itself and the chair of governors. They displayed 17 Childline posters in at least one place, but they'd 18 blanked out the phone numbers, so no child, even if they 19 could get a telephone, could actually call it. 20 MS SCOLDING: That moves us neatly into the 21 Independent Listener. That has been in the national 22 minimum standards since 2002. Every school which has 23 come to give us evidence says that nobody uses it. 24 Firstly, is there value, firstly, within what I am 25 going to call the mainstream boarding sector and,</p> <p style="text-align: center;">Page 121</p>	<p>1 secondly, in terms of the residential special school 2 sector, in having some form of independent advocate, 3 listener, whatever one chooses to call them? 4 MS SPIELMAN: In theory, yes, but in practice, clearly, it 5 is not obvious that we have found the right way of doing 6 it, and I think some really quite pragmatic research 7 work to look at how, where children have made difficult 8 disclosures, the channels those have come through, how 9 can we make children as likely -- what are the channels 10 that actually will work best for children, so how can we 11 make it as easy as possible? 12 MS SCOLDING: I am thinking particularly for international 13 students, they may well require a completely different 14 sort of service than that for mainstream because there 15 may well be cultural or other differences which might 16 mean they need a slightly different approach. 17 MS SPIELMAN: Yes, looking into this, it is unlikely there 18 would be an absolutely one-size-fits-all, but as I say, 19 that distinction I made between children who are in 20 regular communication with family and friends, who have 21 reasonable access to all the technology that modern 22 children use and those who are restricted or blocked 23 from using it is quite a significant one, we need to 24 make sure we think through the different groups we are 25 addressing.</p> <p style="text-align: center;">Page 122</p>
<p>1 MS SCOLDING: If we are thinking -- following on from that, 2 one of the suggestions which has been raised is really 3 to replace the Independent Listener or Independent 4 Person, as they have identified, in residential special 5 schools as I believe they are called, with more of 6 a visitor, so like the Regulation 44 Visitor that you 7 currently have in children's homes. 8 Do either of you have any view about that, in order 9 to provide a levy of consistent advocacy? 10 MS SPIELMAN: If the evidence, as it stands, is they are not 11 used, it is not clear that simply having them turn up 12 more frequently on more of a schedule, would necessarily 13 make children any more disposed to use them. 14 To put it in context -- when we think about the 15 resources we have got for assurance, thinking of -- we 16 should be pragmatic and say, "How much value comes from 17 each of these different kinds of layers of protection 18 and could this one justify what it would cost?", 19 relative to what one might get from putting the same 20 resource into one of the other protections. 21 MS SCOLDING: I suppose the -- where it has come from really 22 is from experience of schools -- I was thinking of the 23 evidence of Southlands School yesterday, where they 24 identified that, since it has been registered as 25 a children's home and the Regulation 44 advocates come</p> <p style="text-align: center;">Page 123</p>	<p>1 in, there's been a difference, a qualitative difference, 2 in the way that children have responded and reacted 3 because they can develop the relationship that maybe 4 doesn't happen with the Independent Listener. 5 MS SPIELMAN: Well, I think here there might be a different 6 between the mainstream boarding school and the very 7 small institution, the very small children's home or 8 special school. 9 In a mainstream school with 500, 600, 700 children, 10 one person who is there for half a day every week, it is 11 not clear that they would become an integral part of the 12 school in the same way, so I don't think we should 13 necessarily mix up these children with significant 14 difficulties and communication needs who we are rightly 15 looking after in very small communities. The issue of 16 advocacy absolutely matters and much of the regulation 17 around social care is around making sure that children 18 have advocates. We also need to look at this in the 19 context of the other systems that exist to make sure 20 that children who are looked after have advocates and 21 sufficient supervision. So a child in care will 22 typically have several adults with whom they are already 23 talking directly, the social worker, the IRO and so on, 24 so we need to make sure it ties together and doesn't 25 flood children with more people than they could possibly</p> <p style="text-align: center;">Page 124</p>

<p>1 talk to.</p> <p>2 MS SCOLDING: I think, in particular, the issue arises in</p> <p>3 schools which are residential special schools which</p> <p>4 might have exactly the same level of complexity as</p> <p>5 children who are looked after, but they are not</p> <p>6 looked-after children, because you have got</p> <p>7 a significant cohort within those schools who will not</p> <p>8 be looked after.</p> <p>9 MS HUMPHREYS: This is the theme we have talked about, that</p> <p>10 children with the same needs could be in a residential</p> <p>11 special school as could be in a children's home, as</p> <p>12 could be in a short-break setting, the child in the</p> <p>13 short-break setting and the children's home are subject</p> <p>14 to regular visits on a monthly basis; the child in the</p> <p>15 residential special school is subject to NMS 20, and</p> <p>16 that the governing body may appoint one of their number</p> <p>17 or an independent person to come in and undertake</p> <p>18 a report.</p> <p>19 But, actually, the NMS doesn't actually say what</p> <p>20 then happens.</p> <p>21 MS SCOLDING: Okay.</p> <p>22 MS HUMPHREYS: Whereas Children's Home Regs are very clear.</p> <p>23 MS SCOLDING: Can we turn to a completely different topic,</p> <p>24 which is about music schools and whether or not there</p> <p>25 were any particular issues to do with -- in particular,</p> <p style="text-align: center;">Page 125</p>	<p>1 what came out of the evidence last week was whether or</p> <p>2 not there needed to be some kind of compulsory</p> <p>3 registration of music teachers. So not teachers who</p> <p>4 teach music in school as a curriculum subject, but</p> <p>5 instrumental tutors or voice tutors who come in on</p> <p>6 a peripatetic basis. Does Ofsted have a particular view</p> <p>7 about the usefulness or otherwise of that?</p> <p>8 MS SPIELMAN: I think at this stage our view is we cannot</p> <p>9 see a substantial benefit from that over and above</p> <p>10 having schools fulfil their responsibilities properly</p> <p>11 and oversee, check and supervise the work of music</p> <p>12 tutors.</p> <p>13 We saw and listened to the evidence and, yes, we</p> <p>14 agree with the points about the particular difficulties</p> <p>15 around music tuition, some other kinds of vocational</p> <p>16 education, all the reasons why the relationships that</p> <p>17 develop between children and teachers can be different</p> <p>18 in nature and more risky, but registration of itself</p> <p>19 doesn't necessarily seem likely to justify the cost and</p> <p>20 complexity as compared with proper oversight by the</p> <p>21 school.</p> <p>22 MS SCOLDING: Can I ask you as well about funding cuts.</p> <p>23 Within, particularly, your second witness statement,</p> <p>24 Ms Spielman, you identify the significant cuts that have</p> <p>25 been made to your inspection service, particularly since</p> <p style="text-align: center;">Page 126</p>
<p>1 2010, but since 2000 as a whole.</p> <p>2 What difference has that made in terms of the</p> <p>3 ability to assure or for the public to know that Ofsted</p> <p>4 inspections are looking properly at the care and welfare</p> <p>5 of children?</p> <p>6 MS SPIELMAN: This has been a trend since about 2005,</p> <p>7 I think our budget has been reduced every year for the</p> <p>8 last 15 years.</p> <p>9 MS SCOLDING: Right.</p> <p>10 MS SPIELMAN: So we have -- and particularly in education,</p> <p>11 but also in social care, the money we receive now is</p> <p>12 substantially less than at the point we took over the</p> <p>13 chunk of CSCI's budget.</p> <p>14 So we have had to make our inspection models</p> <p>15 shorter, tighter, to achieve that, we have made</p> <p>16 ourselves more efficient in many ways. But it doesn't</p> <p>17 mean, if you think about assurance in layers, it means,</p> <p>18 if you think about it like a trifle -- I think was the</p> <p>19 analogy I used -- you have several layers, you have your</p> <p>20 cake, your fruit, your custard, your cream. If</p> <p>21 inspection is one of those layers, it has necessarily</p> <p>22 become thinner, so government is -- by implication, we</p> <p>23 are relying more on other layers in the trifle than we</p> <p>24 are on inspection, is the implication, but we are making</p> <p>25 the absolute most of what we have.</p> <p style="text-align: center;">Page 127</p>	<p>1 MS SCOLDING: But those other layers have also been subject</p> <p>2 to significant budget reduction, largely.</p> <p>3 MS HUMPHREYS: Yes.</p> <p>4 MS SPIELMAN: To varying degrees.</p> <p>5 MS SCOLDING: Yes.</p> <p>6 MS SPIELMAN: If we are in the independent sector, I don't</p> <p>7 think school fees -- school fees have not reduced.</p> <p>8 MS SCOLDING: As I understand it, no.</p> <p>9 MS SPIELMAN: By implication, the proportion of weight that</p> <p>10 is on the assurance that governors give has probably</p> <p>11 increased, but it is a balance between those pieces.</p> <p>12 But I have been very clear and very public about the</p> <p>13 fact that I think that we do provide as much</p> <p>14 assurance -- the assurance that inspection ought to</p> <p>15 provide, but that we are at the absolute thinnest model</p> <p>16 we can possibly do that on, and I would be very</p> <p>17 concerned about any attempt to reduce it further.</p> <p>18 MS SCOLDING: Therefore, when we are looking, as</p> <p>19 an investigation, in terms of changes or challenges,</p> <p>20 there would inevitably need to be significant resource</p> <p>21 implications to that?</p> <p>22 MS SPIELMAN: Yes.</p> <p>23 MS SCOLDING: The last point I wanted to raise, which I have</p> <p>24 not raised with the Independent Schools Inspectorate and</p> <p>25 which we will come back to, because I am just asking it</p> <p style="text-align: center;">Page 128</p>

<p>1 briefly on behalf of Mr Scorer of Slater and Gordon 2 because he may not be here during phase 2 and he would 3 like to know the answer to that. 4 You set out in some detail, shall we say, some 5 historic issues between yourself and the Independent 6 Schools Inspectorate, but what I am really interested 7 in -- and we will obviously deal with that, both with 8 the ISI and with yourselves, in phase 2. What I am 9 asking on behalf of Mr Scorer is, what is the current 10 position in respect of your oversight of the Independent 11 Schools Inspectorate and what is your view about that? 12 MS SPIELMAN: The current position is we have a statutory 13 requirement to make an annual report on the work of the 14 Independent Schools Inspectorate, but the only work that 15 we can do is what we are commissioned to do by the 16 Department for Education. 17 For the last few years, we have been commissioned to 18 do such a small amount of work, or no work, that it has 19 been impossible for us to express an opinion, and I have 20 made the report, but the report has been that I am 21 unable to express a view. 22 This is obviously a less than satisfactory state of 23 affairs, which I have had no ability to change, but we 24 have raised this a number of times in conversations with 25 ministers who have proposed a slightly different working</p> <p style="text-align: center;">Page 129</p>	<p>1 arrangement, involving a degree of joint working, 2 sharing of information and models for mutual benefit. 3 I have been very clear and I think you have got 4 a copy of the letter I wrote to Lord Agnew to say that 5 of course we are extremely happy to be collaborative and 6 cooperative, in the interests of children, to make sure 7 that both our inspection models and our processes are as 8 good as they can be, but that that will not provide any 9 level of assurance about the work of ISI, and that he 10 needs to understand that from the outset, that this may 11 be valuable of itself, but it is not a means of getting 12 assurance. 13 MS SCOLDING: And you have identified that, at the moment, 14 the level of monitoring you do is de minimis, in effect, 15 so, therefore, you cannot provide any level of quality 16 assurance. 17 MS SPIELMAN: Yes, and -- 18 MS HUMPHREYS: Are we doing any? 19 MS SPIELMAN: I think this year there was none, it has been 20 reduced and reduced and reduced, from, a number of years 21 ago, quite a substantial piece of work, to effectively 22 nothing. 23 MS SCOLDING: Okay. Are there any particular risks with 24 decreasing the scrutiny of the -- looking at the ISI 25 from your perspective as Ofsted? Again, ISI, obviously,</p> <p style="text-align: center;">Page 130</p>
<p>1 during phase 2, will have an opportunity to respond 2 fully to any remarks you might make. 3 MS SPIELMAN: It feels like quite an asymmetry, in that 4 I feel our work is very heavily scrutinised, we have 5 substantial standing policy teams, we employ permanent 6 inspectors, we have a research and evaluation team, we 7 study the effectiveness of our own processes and report 8 on them, and we are accountable to parliament. 9 There is an enormous amount of scrutiny of our work 10 and outside influences as well as our own structures 11 that push us to iterate and improve. It feels though 12 that is not true across the board, so it seems odd, on 13 the one hand, to put us through this rigour and to have 14 so little assurance of ISI. 15 MS SCOLDING: I have no further questions for you. It may 16 be that the chair and panel have questions for you. 17 Questions from THE PANEL 18 THE CHAIR: Yes, I'll begin. Can you tell me, Ms Spielman, 19 how many social care inspectors Ofsted has? 20 MS SPIELMAN: We have, I think, about 40 social care HMI 21 and -- 22 MS HUMPHREYS: 148 social care regulatory inspectors who 23 would inspect the residential special schools and 24 children's homes. 25 THE CHAIR: Thank you. What proportion of them have social</p> <p style="text-align: center;">Page 131</p>	<p>1 work qualifications? 2 MS HUMPHREYS: Most -- all social care HMI have a social 3 work qualification. 4 THE CHAIR: Which is 140? 5 MS HUMPHREYS: No, that is 40. 6 The majority of social care regulatory inspectors 7 have a social work qualification or an equivalent 8 qualification to NVQ level 5 in residential care. 9 THE CHAIR: Do you think that's the right balance? 10 MS HUMPHREYS: Up to about 12 months ago, we always said 11 that a social care regulatory inspector had to have 12 a social work qualification. 13 What we found was that there was -- it meant that 14 there was a group of staff who were working out in the 15 sector, who were managing children's homes, managing 16 services, who would make excellent inspectors by dint of 17 their experience, but, actually, because of the routes 18 they had taken, didn't have a social work qualification. 19 What they did have was a relevant qualification to 20 working in residential care. 21 They were a group of staff that perhaps could be 22 useful to us and what we found is, in this change, we 23 have been able to recruit excellent inspectors with 24 a long and strong background in residential care. 25 THE CHAIR: Okay. My next question is, following on from</p> <p style="text-align: center;">Page 132</p>

1 the May 2012 inspection, it seemed somewhat late in the
2 day for Ofsted to have to establish an adequate internal
3 quality assurance system?
4 MS HUMPHREYS: Is this after Stanbridge Earls?
5 THE CHAIR: Yes.
6 MS HUMPHREYS: So May 2012?
7 THE CHAIR: Is that the correct one, the one that evaluated
8 them as "outstanding"?
9 MS HUMPHREYS: Yes, so May 2012, because in May 2012, we
10 actually thought the view was that that inspection was
11 satisfactory, there was no concerns about that
12 inspection, it was only when we did the review in 2013
13 that it identified the flaws.
14 THE CHAIR: I see. But, in general, at that point, was it
15 the case that the draft inspection reports were checked
16 by supervisors and read?
17 MS HUMPHREYS: Yes, they were, absolutely.
18 THE CHAIR: So nothing was published or went out without
19 being seen?
20 MS HUMPHREYS: Seen through the QA -- we had an established
21 quality assurance team who would read all reports, but
22 they wouldn't necessarily check the evidence base.
23 THE CHAIR: I see. That has subsequently changed?
24 MS HUMPHREYS: Yes, it has.
25 THE CHAIR: Okay. Some fairly technical questions: does

Page 133

1 the provider needs to have to help them on the path to
2 improvement, that we provide as much of that as we can
3 without stepping outside our responsibilities.
4 THE CHAIR: But it would be and is possible to have a lead
5 inspector who does not do the improvement work; in other
6 words, a different inspector could do that?
7 MS SPIELMAN: It absolutely is and it is the norm in many
8 inspectorates and it is certainly how Ofsted has worked
9 at times in the past.
10 THE CHAIR: Can government ministers direct Ofsted to carry
11 out reviews or investigations into specific cases?
12 MS SPIELMAN: That's a question I cannot answer.
13 MS HUMPHREYS: So the DfE could commission us to do
14 inspection of a school.
15 MS SPIELMAN: Yes, but to investigate a specific case of
16 a child?
17 THE CHAIR: Yes.
18 MS SPIELMAN: I don't believe that has ever happened.
19 MS HUMPHREYS: We will have to come back on that one, but we
20 don't think so.
21 THE CHAIR: Okay.
22 MS SCOLDING: I'm not entirely sure the powers under the
23 2008 Act permit such a thing to take place, because they
24 simply identify that the role of Ofsted is to provide
25 inspections, whether standard or emergency, but I may

Page 135

1 Ofsted have an explicit purpose of support to
2 improvement in its work?
3 MS SPIELMAN: The statutory obligations are to report and
4 the Department for Education Strategy, broadly -- and
5 Policy -- over the last few years, has been to separate
6 Ofsted from the improvement function, to have
7 improvement operate in education partly through the
8 school-led system model and partly through the DfE
9 having Commissioners in both education and social care.
10 So as a matter of policy, our improvement role has
11 been progressively removed.
12 THE CHAIR: Okay, do you think that is a good thing?
13 MS SPIELMAN: I think it creates more problems than were
14 necessarily recognised at first sight. I think it looks
15 like a very clean model where diagnosis sits in one
16 place and improvement sits in another and the
17 inspectorate is not marking its own homework.
18 In practice, I think it does raise significant
19 challenges, it can help -- it can prevent you having
20 some of the right conversations. I talked earlier about
21 the need for the professional dialogue in inspection,
22 and that is part of why the main new -- the frameworks
23 we are now operating are designed, while not cutting
24 across the government policy intention but to make sure
25 that that developmental, what is the conversation that

Page 134

1 well be wrong about that as well.
2 THE CHAIR: It is possible in other inspectorates in the UK.
3 I think this may be my final point, but I am going
4 back several hours now, the question of residential
5 special schools changing their criteria, usually, or
6 often, because, for commercial purposes, to extend
7 access.
8 MS SPIELMAN: Yes?
9 THE CHAIR: Do you think the DfE currently adequately
10 interrogates these changes and their implications for
11 care and welfare?
12 MS HUMPHREYS: No. I don't think they do.
13 THE CHAIR: Ms Spielman?
14 MS SPIELMAN: I have no view into how they do it, but the
15 cases we have seen suggest that it is not necessarily
16 picked up.
17 MS HUMPHREYS: Sometimes we might come across a situation
18 where we will go out and do an inspection and we will
19 discover that the boarding numbers have increased or
20 there has been a change of proprietor, or the age range
21 of the children being accommodated there has changed.
22 And there has been no material change, so we will notify
23 the DfE, and then what they want us to do is
24 a retrospective material change visit in order to put it
25 right, instead of what we want, which is a penalty for

Page 136

<p>1 the fact that the school has been operating outside its 2 registration criteria. 3 MS SPIELMAN: I mentioned deliberate non-compliance earlier 4 on, and I can certainly think of examples that I have 5 seen where a school has intentionally admitted far above 6 its registered number. 7 THE CHAIR: I was thinking of the point one of you made 8 earlier about the range of conditions that might be 9 admitted to children with these conditions, admitted to 10 the school, there is no specialist or properly trained 11 staff support to that. Is that an area that DfE ought 12 to be able to interrogate and require some evidence of 13 before agreeing to extend the registration? 14 MS SPIELMAN: It feels like an asymmetry between the regime 15 for new schools, where there is a pre-registration 16 review, and material change; it doesn't feel as though 17 there is a robust-enough regime for looking again at 18 school capacity when there is a material change or 19 sanctions for schools that fail to report. 20 MS HUMPHREYS: It is extremely difficult when you go out to 21 do a retrospective material change because the changes 22 have happened. Those children are at that school. 23 THE CHAIR: But they may not be -- if they apply to vary or 24 change the registration, that would be the DfE that 25 needed to approve that.</p> <p style="text-align: center;">Page 137</p>	<p>1 MS SPIELMAN: Yes, it would. 2 THE CHAIR: So do they actually make enquiries of how they 3 are adjusting the various relevant aspects of their 4 functioning, in order to accommodate that? 5 MS SPIELMAN: If they make enquiries, I don't think they 6 come to us to verify them, I think is the only answer 7 I can give there, so I have no insight into the internal 8 workings of DfE. 9 THE CHAIR: Thank you very much. Ms Sharpling? 10 MS SHARPLING: One for Ms Spielman, if I may. The inquiry 11 provides a unique opportunity to say in public what you 12 would do to change the system if you had the 13 opportunity. I wonder, Ms Spielman, if you could 14 distill for us the key things you would like to change 15 to better protect children from sexual abuse now and in 16 the future, which of course is one of our primary roles? 17 MS SPIELMAN: Thank you. The things that I think I would 18 really want to pull out are the points about 19 translating -- two strands: one about translating 20 policies into practice, making sure that we have that 21 balance between the perfect architecture and what people 22 can actually handle, think about, talk about on the 23 ground, because we have got to make sure we have got 24 systems that maximise the likelihood that staff will 25 operate them well, that children will not be mistreated</p> <p style="text-align: center;">Page 138</p>
<p>1 in the first place, or that concerns will surface 2 incredibly rapidly in what should be the very rare cases 3 where they do happen. 4 This piece about the training, the discussion, the 5 familiarisation, the making it possible and normal for 6 people in every kind of institution to have the 7 conversations that contemplate, that air, that surface, 8 without feeling constrained. That is one strand. 9 The other strand is using the regulatory tools that 10 we have, I really believe that we do need to start 11 slightly at the other end in who we put in charge of 12 schools and, when we consider a red flag has gone up 13 that says it probably shouldn't be in charge of schools 14 anymore, or shouldn't be in a school anymore, 15 I genuinely think that history shows that we haven't got 16 that in the right place at the moment. 17 And that we could use the regulatory regime to get 18 into a better place. 19 MS SHARPLING: Thank you. 20 THE CHAIR: Thank you. No further questions. Thank you. 21 MS SCOLDING: I now pass over to Ms Bicarregui who will 22 Ms Jolanta McCall. 23 MS BICARREGUI: Thank you, as Ms Scolding said, I now call 24 Jolanta McCall, who is the chief executive and the 25 principal of the Seashell Trust, and she is going to</p> <p style="text-align: center;">Page 139</p>	<p>1 start a strand of evidence on the Royal School 2 Manchester. 3 MS JOLANTA MCCALL (sworn) 4 Examination by MS BICARREGUI 5 MS BICARREGUI: Thank you Ms McCall. I am going to just 6 mention a few things before I start asking you 7 questions. 8 If you have been watching the inquiry, you have 9 probably heard them, but this is not supposed to be 10 a test of your memory, so if you need to refer to your 11 witness statement, that is absolutely fine. It should 12 be in the bundle in front of you. 13 If I do refer to documents -- and I will be calling 14 up some documents -- then they will appear on the 15 screen, so you will be able to look at them there. 16 Secondly, you can have a break if you need one. We 17 will be having an afternoon break in about an hour's 18 time but if you need one before that, then let me know. 19 Lastly, a few parts of your witness statement have 20 ciphers in them, so we refer to certain members of staff 21 under RS-F2, F3 and F11. If you could try not to 22 mention particular names in the course of your 23 questions, thank you very much. 24 A. Thank you. 25 Q. If you could just turn to your statement then Ms McCall,</p> <p style="text-align: center;">Page 140</p>

<p>1 it should be at tab A/1 of the bundle in front of you. 2 If you look at the back, your signature has been 3 redacted, but do you remember signing that witness 4 statement? 5 A. Yes, yes, I do. 6 Q. Can you confirm it is true, to the best of your 7 knowledge and belief? 8 A. That's correct. It is correct. 9 Q. Chair and panel, the witness statements should be in 10 core bundle E at tab E/10. 11 Ms McCall, you are the chief executive and the 12 principal of the Seashell Trust? 13 A. That's correct. 14 Q. And you have been in that post since September 2018? 15 A. That's right. 16 Q. Amongst other things, because the Seashell Trust runs 17 a number of children's homes, for example, and the Royal 18 College Manchester, you also -- the trust runs the Royal 19 School Manchester; is that right? 20 A. That's correct. 21 Q. Just to clarify, you have been in post since 2018, so 22 when we are looking at historic documents, you have been 23 provided with those documents? 24 A. That's correct, yes. 25 Q. And you have had a chance to read them?</p> <p style="text-align: center;">Page 141</p>	<p>1 A. Yes. Very much in detail. 2 Q. Thank you very much. 3 So in the evidence today, Ms McCall, we are going to 4 be looking broadly at three areas. I would like to ask 5 you about the pupils at the Royal School Manchester and 6 if you are able to help us with whether or not those 7 pupils have changed in their needs since 2001/2002. 8 Then I would like to look at the safeguarding 9 structures in the school and to give some sense of the 10 safeguarding protections and the measures you have in 11 place. 12 Lastly, we will be looking at some vetting and 13 barring issues which arise from disciplinary action 14 taken against certain members of staff. 15 Ralph, if we could get up the beginning of 16 Ms McCall's statement at SST000083_001, I put this up 17 here as a point of reference for you, Ms McCall. It is 18 the second part of that page, please, Ralph. 19 So, if I summarise, the Royal School Manchester 20 began as a school for the deaf, didn't it, on various 21 sites? 22 A. That's correct. 23 Q. You set out in your statement that the needs of pupils 24 have changed over time. Can you give us a sense of how 25 the needs have changed since the trust was set up?</p> <p style="text-align: center;">Page 142</p>
<p>1 A. I think that it is really very important to note that 2 the environment around us has changed over the years. 3 So we heard from the previous witnesses comments about 4 advances of medicine, survival rates. So, with this, 5 the cohort of children changed, but also our thinking 6 about where the education and care should be provided. 7 So to start off, there was the thinking about that 8 all deaf children should be educated in specialist 9 residential schools, and this is how the trust started. 10 Then we have another tendency going to provider 11 education, and care, closer to home through the special 12 schools, but also through their resource bases in 13 mainstream schools, so the thinking has changed in that 14 case. 15 So what happened to Royal School Manchester, that 16 our cohort of children has changed. The majority of -- 17 when we look at the statistics, for instance, 18 40 per cent of deaf children will have additional or 19 complex needs. 20 So naturally, the complexity of our cohort of 21 children has grown from year to year and I would say 22 that sort of in the last 30, 40 years, it became really 23 very apparent that the Royal School Manchester should 24 really focus on complex needs children, but it didn't 25 happen overnight. It was a slow progression of changing</p> <p style="text-align: center;">Page 143</p>	<p>1 the cohort. 2 Q. And it is only putting it in the crudest terms, you are 3 no longer a school for deaf children? 4 A. We are no longer a school for the deaf. We are 5 providing education and care to a very -- the most 6 vulnerable children, who have very complex needs. 7 All of the -- our students have neurological 8 problems, problems with communications, medical needs, 9 there are children who are visually impaired, hearing 10 impaired, but also with severe autism which presents 11 with self-harming, challenging behaviour. But the 12 complexity -- and learning difficulties, really severely 13 profound learning difficulties. So there is a very 14 specific cohort of these children and the presentations 15 are really very different to what you can find in 16 ordinary special schools, where probably you will find 17 one or two children on this level of need, where, in 18 Seashell Trust, all children and young people are very 19 vulnerable and have difficulties with communication and 20 medical needs. 21 Q. How many pupils do you have at the moment? 22 A. So in September 2019, we have 44 children on our roll. 23 Our capacity has been cut to 50, 50 students, mostly 24 because of the physical building restrictions. These 25 buildings were built in the 1950s, for deaf children,</p> <p style="text-align: center;">Page 144</p>

<p>1 able-bodied students, so in order to make children safe 2 and provide a safe environment, the previous CEO made 3 the decision of capping the number of students at 4 school. 5 Q. Just to explore a little bit more the complexity of the 6 students that you have, is it right to say that none of 7 the students that you have have capacity, in the sense 8 that we understand, to take decisions in various areas 9 of their life? 10 A. That's correct. One of the most important things is 11 that we are not following national curriculum. These 12 children are coming to us referred mostly through local 13 authorities, where the previous special school placement 14 had broken down, they have failed their students. Not 15 because they are not good; they simply don't have the 16 expertise or capacity to meet the needs of the children, 17 and it is quite heartbreaking that we are pretty much 18 the last resort for some local authorities and, 19 actually, if we are not meeting the needs of these 20 children, the next organisation would be a secure unit 21 and we do everything possible to prevent this. 22 So in terms of -- as I said, we are not providing -- 23 we are not following national curriculum. What we are 24 teaching, it is very much tailored to the needs of the 25 child. It is the dynamic curriculum based on life</p> <p style="text-align: center;">Page 145</p>	<p>1 skills and making choices and giving means of 2 communications. 3 Preparation for adulthood. These are our main aims 4 in terms of their education of the children. 5 Chair, I really want you to note it is a very 6 unusual organisation, mostly because the -- we are 7 providing for these children a waking curriculum, so it 8 means that what is taught in school has to be repeated 9 in case -- 10 Q. We heard about a 24-hour curriculum earlier in the 11 evidence and you are providing for these children both 12 through the day and then -- 13 A. After school. 14 Q. -- in the evening and after school? 15 A. Yes. 16 Q. Thank you. Can we get a sense, Ms McCall of how your 17 children communicate? Because one of the things that 18 the chair and panel are interested in is obviously how 19 children are able to communicate where there has been 20 abuse or there are things that are going wrong. 21 You described to me -- you have described a great 22 deal of complexity in terms of your student population. 23 I think one example that you have given is that you have 24 children who are both deaf and blind in your school, and 25 so their means of communication, as I understand it, is</p> <p style="text-align: center;">Page 146</p>
<p>1 an objects of reference system, so could you explain to 2 the chair and panel what that would involve? 3 A. So for children who are both deaf and blind, so 4 multi-sensory impairment, there are sort of means of 5 communication by signing in hand, but also using the 6 object of the reference. 7 So this is a two-way communication, but let's say, 8 if we want to teach the deaf/blind child to communicate 9 with us that we are going to school, then we have a pen 10 which will represent writing and going to school. 11 So by taking this object and giving it to the child, 12 we -- the child understands that now it is time to go to 13 school. 14 Again, if the child wants to have a drink, it will 15 pick up the object of reference, a cup, just to let us 16 know that it is time, he is thirsty and wants some 17 drinks. 18 Talking mats, a different way of communication, not 19 only for MSI children, but also for autistic children -- 20 I mean, all of our children, they do not communicate -- 21 Q. When you say a "talking mat", what do you mean, for 22 people who are listening? 23 A. A talking mat is a resource whereby touching it is -- 24 it's a high technology which sort of says back things, 25 the choices.</p> <p style="text-align: center;">Page 147</p>	<p>1 Q. Is it a symbol that the child can choose on the screen? 2 A. It could be on the screen, it could be as a mat on the 3 floor. Depending, once again, on the child. 4 Q. So we have the objects of reference. Signing, 5 obviously? 6 A. British sign language, supported English, gestures, 7 looking at sort of high technologies, symbols, pictorial 8 exchange systems. Visual timetable is extremely 9 important because these children require some routines 10 to lower the level of anxieties. 11 Q. It may not need saying, Ms McCall, but none of the 12 children are verbal? 13 A. There is a very small number of children in our school 14 who can communicate orally. 15 Q. Okay. You have mentioned that this is a cohort of 16 children who are "forgotten". What do you mean by that? 17 A. Well, what I have to say is that there is a very low 18 incidence of these children. 19 Q. There are very few of these children? 20 A. There are very few of these children nationally, it is 21 a very small cohort. 22 But at the same time, because of that, there are 23 difficulties with communication; very often these 24 children are forgotten, and I was really in a big 25 distress reading a recent report from the Children's</p> <p style="text-align: center;">Page 148</p>

<p>1 Commissioner about the specialist units that autistic 2 children, or children with the communication -- placed 3 in the secure unit, they really don't have the means of 4 communication and there is a lack of training. 5 Q. So as well as that sense that you are talking about, of 6 being forgotten, you also I think describe that there 7 a gap in how this very complex group of children are 8 described, and so that means they may get placed in the 9 wrong school. So it is only when they fail in those 10 schools -- what do you mean? How does that work? Why 11 is it we don't know enough about the needs of these 12 children? 13 A. I think the core of the problems is our science and 14 terminology we are using. We are not distinguishing 15 between the additional needs, how the local authority 16 are -- log children's needs, ie, by their prime need or 17 secondary need. There is a lot of discretion, how we 18 describe the children. 19 But, at the moment, there is no scientific way of 20 profiling these children by presentation because complex 21 needs, it means that it will be a different 22 presentation, so when we talk about the autistic child 23 and the hearing impaired child, the presentation, the 24 profile of this child, will be completely different. 25 With the ways of self-harming, their challenging</p> <p style="text-align: center;">Page 149</p>	<p>1 behaviour, language, communication means, medical needs, 2 the social skills, so there is no profile which sort of 3 addresses, holistically, the child. 4 Q. Thank you. So there needs to be, do you think, a better 5 way of describing this small cohort of children so they 6 are better understood? 7 A. That's right. Even within the specialist provision, we 8 say "complex needs children", but we really don't see 9 a child in this phrase. 10 So, for me at Seashell Trust, the complexity is on 11 the extreme. 12 Q. Thank you very much. Chair and panel, we are going to 13 look at the safeguard structure in place at the 14 Seashell Trust, Ms McCall this is dealt with at 15 paragraph 9 of your witness statement, and I think, if 16 we are going to look at how safeguarding is embedded for 17 your very vulnerable children, we need to look a little 18 bit about the structure. 19 You are a trust and so you have a two-tier 20 government structure, essentially at the top, don't you, 21 a group of members who are occasionally elected as 22 trustees and then a group of directors who are 23 responsible for the day-to-day management of the trust; 24 is that right? 25 A. Yes, that's correct.</p> <p style="text-align: center;">Page 150</p>
<p>1 Because it is the charity, we have the directors and 2 the trustees, so the directors are to do with the 3 compliance with the company law and trustees with the 4 charity, charity law. 5 Q. Thank you. You also have a board of governors which 6 meets termly; is that right? 7 A. That's correct, it is both for the school and for 8 college. 9 Q. Thank you. It says -- you say it includes independent 10 governors, what do you mean by "independent" in this 11 context? 12 A. Independent governors, it means people who are not 13 exactly directly involved with the operation of the 14 school or college. So these are the people who are not 15 staff members and they are not parents. 16 Q. Okay, and do you advertise for independent governors or 17 how do you seek out independent governors? 18 A. Yes, we advertise, both for trustees and for directors, 19 as a national advert. 20 Q. How many of the board of governors would be independent, 21 approximately? 22 A. Well, so the majority are independent. The parents 23 and -- the parent trustees, we have two. 24 Q. Now, the board of directors, delegate to an executive 25 leadership team and you are a member of that team; is</p> <p style="text-align: center;">Page 151</p>	<p>1 that right? 2 A. That's correct. 3 Q. Then there is a series, as I understand it, of 4 subadvisory committees to the executive leadership board 5 and there is an actual safeguarding board that reports 6 back to you? 7 A. To the board, yes. 8 Q. So that is a sort of basic framework, if you like, of 9 the trust, but in terms of safeguarding, which I would 10 like to focus on now, it seems from what I read in your 11 witness statement that both the board of directors has 12 a role in safeguarding and then the Seashell Trust 13 safeguarding board obviously plays a main part. Is that 14 your understanding as well of the two -- there are other 15 components but, at the highest level, there is the 16 director who is also a safeguarding director; is that 17 right? 18 A. Well, from the safeguarding perspective, the board has 19 overall responsibility for safeguarding and consider its 20 operating responsibility to report to different 21 regulatory bodies. 22 Q. Is there one director who is simply allocated -- whose 23 main responsibility is safeguarding? 24 A. That's right, there is one director who is chairing the 25 safeguarding board.</p> <p style="text-align: center;">Page 152</p>

1 Q. Can you explain to us briefly what the Seashell Trust
 2 safeguarding board is and what it does?
 3 **A. Right, the safeguarding, Seashell safeguarding board,**
 4 **consists of a chair who is also a director and**
 5 **a trustee; within the membership, we have got**
 6 **independent people invited to join our board from the**
 7 **police, the CQC, but also from the local authority.**
 8 They have a designated safeguarding lead with the
 9 deputies who are the heads of departments, but also we
 10 have a separate safeguarding officer.
 11 The role of this group, they are really coming
 12 together very -- so this is the safeguarding board and
 13 then we do have a safeguarding group which meets
 14 fortnightly and really reviews all the causes for
 15 concerns, medical errors, and looks at the development
 16 of safeguarding --
 17 Q. Yes --
 18 **A. -- procedures.**
 19 Q. -- my understanding is there a safeguarding board which
 20 meets less frequently but does the higher-level analysis
 21 of safeguarding issues that come in and then you have
 22 the designated safeguarding lead group?
 23 **A. That's right.**
 24 Q. And that meets fortnightly?
 25 **A. Fortnightly, but also the other very important thing is**

Page 153

1 Q. Just briefly to touch on external sources outside of
 2 that governance structure, you have already talked about
 3 the fact that the Seashell Trust safeguarding board has
 4 external members. You also describe, and this is in
 5 paragraph -- this is in your statement, I think at
 6 paragraph 10, that you work closely with the local
 7 safeguarding partners.
 8 To what extent do you -- is it that your DSL sits
 9 with the safeguarding partners? How does that work,
 10 that relationship?
 11 **A. I think the one important thing is that it is really to**
 12 **distinguish between the local authority, the home local**
 13 **authority, and the local authority where the**
 14 **organisation is placed.**
 15 **So overall, we are working with 40 different local**
 16 **authorities. But our main local authority where the**
 17 **organisation is based is Stockport. We have very close**
 18 **relationship with Stockport Local Authority and the**
 19 **LADO.**
 20 Q. Thank you, Ms McCall.
 21 We heard a lot this morning from Ofsted, so you are
 22 registered as a children's home because you have
 23 children for more than the required number of days,
 24 295 days, so you are inspected then against the
 25 quality --

Page 155

1 **that there are sort of electronic alerts, so the group**
 2 **does not meet only fortnightly, but if there is a cause**
 3 **of concern meeting that level, there is an alert into**
 4 **members' emails who will look at the cause of concern**
 5 **immediately.**
 6 I would sort of say that the basics of safeguarding
 7 in Seashell Trust is really in our culture of being open
 8 and people very well trained and encouraging people to
 9 put -- raise their concerns.
 10 So I think the -- we -- our stand is that it is
 11 better to overreport than underreport. So the sort of
 12 neutral way of reporting is very much encouraged to all
 13 our staff.
 14 Q. I am going to come on a little bit to look at some of
 15 the really concrete ways you embed the safeguarding
 16 culture around, but I wanted to give a sense that there
 17 seem to be lots of structures which have safeguarding at
 18 their heart, so people looking at safeguarding
 19 monitoring forms on a fortnightly basis and then
 20 presumably escalating things to the board if there are
 21 requirements to do so?
 22 **A. That's correct.**
 23 Q. And the board level, there is external scrutiny of those
 24 alerts as well, is that right?
 25 **A. That's right.**

Page 154

1 **A. This sort of comes to our dual registration: one,**
 2 **education, the Royal School Manchester is registered as**
 3 **a special school, and we also have registration for**
 4 **residential part, which is children's homes, there are**
 5 **seven homes and they are coming under Quality Standards**
 6 **registration where the school is assessed by minimum**
 7 **standards.**
 8 **However, what is really very important, that for**
 9 **us --**
 10 Q. Sorry, Ms McCall, the children's homes are assessed
 11 against the Quality Standards?
 12 **A. Yes, and within my role as a chief executive, I am also**
 13 **responsible individual and nominated individual for this**
 14 **part of our activities.**
 15 Q. For that purpose?
 16 **A. Yes.**
 17 Q. This morning, we heard sometimes, where the pupils have
 18 high medical needs, there is also inspection by the CQC
 19 and that is the case for your school?
 20 **A. This is also the case for us, yes.**
 21 Q. And I think you have also commissioned a number of
 22 independent safeguarding reviews?
 23 **A. We have. The last one was commissioned in 2017 and then**
 24 **the actions were implemented and revisited by the same**
 25 **team in 2018.**

Page 156

<p>1 Q. So all of the recommendations were followed up in 2 respect -- 3 A. That's correct. 4 Q. I was -- 5 A. Could I mention what else we are doing? 6 Q. You can, of course. 7 A. So within the Quality Standards, we do have the 8 independent visitor, who visits our homes on a monthly 9 basis, where he has a chance to speak to the children 10 but also to parents, staff and check the environmental 11 needs, after school activities, students' choice, so 12 this is really a very comprehensive report every month 13 with the action to complete. 14 Q. Is this what we have been describing as the 15 Regulation 44? 16 A. It is the Regulation 44 Independent Visitor. 17 Q. I think -- I suppose the question is, when you -- you 18 have described, I think, some of the very profound 19 communication difficulties which the children have, so 20 how is the Regulation 44 Visitor able to communicate 21 with those children? 22 A. Well, I have to say it is not easy. It is very 23 difficult to find people with a breadth of 24 communications qualities, understanding of complex 25 needs, but what we are trying to do, to assist the</p> <p style="text-align: center;">Page 157</p>	<p>1 independent visitor, so, whenever possible, we will 2 allocate a speech and language therapist who will 3 facilitate their communication. 4 What we have to understand that the level of 5 questioning, it will be a very simple question to put to 6 the children, "What do you like?", "What did you have 7 for tea?", "What you don't like", "Do you like this?", 8 "You don't like that ..." 9 So there is a feel of children's voice and choice, 10 but it is not only through the Reg 44 Visitor, it is 11 also through other means, like a house meeting, where 12 the children can sort of voice their preferences or the 13 Student Council at school. 14 So there is quite a lot of opportunities and I think 15 that it was Dame Lenehan who mentioned that every child 16 can communicate, and I fully support this, this view, it 17 is really about the means of communication. 18 Q. I think she said, "I have never met a child who could 19 not communicate". That is your view as well? 20 A. That's right. 21 Q. It is finding the means of communicating? 22 A. Yes. 23 Q. Looking, then, at what concrete steps you can take to 24 try and help your children voice concerns -- and you've 25 describe the communication needs and you have also</p> <p style="text-align: center;">Page 158</p>
<p>1 described that they are very vulnerable to abuse. You 2 describe this in 11.4 of your statement -- Ralph could 3 we have that, SST000083_008. Thank you. 4 You talk about high dependency levels, which you 5 have described to us: 6 "... little or no ability to communicate 7 independently. They are therefore very vulnerable to 8 abuse. It is not likely that they will understand or 9 recognise abuse in the normal sense of the word, or 10 disclose such abuse in a typical way. Consequently, we 11 help them to develop their own awareness of self and 12 others and relationships and self-worth." 13 Then you talk about a series of initiatives that you 14 drive through your school in relation to that. 15 Ralph, could we have up SST000086. 16 This is an example, I think, of something which 17 would be put up around the school; is that right? 18 A. Yes, so these posters are around the school and what 19 I really wanted to draw attention, this is 20 a safeguarding poster, which uses symbols and very 21 simple sentences and it is put around the school, it is 22 around -- put around the residential parts, specifically 23 for children and young people. 24 Our children will learn in a context. So it is 25 really very important that we are talking to them in the</p> <p style="text-align: center;">Page 159</p>	<p>1 right understood level. So by seeing these posters 2 constantly, but also trained staff who talk to the 3 children about this, not as a one-off but as a theme of 4 our work, I think it is really exceptional in terms of 5 getting the awareness and for children to understand 6 what is socially acceptable about the consent, private 7 spaces, public -- 8 Q. We are going to go on, actually, to look a little bit 9 more at sexual relationships education, but just in 10 terms of your pupils being able to speak out, this is 11 an example, I think, isn't it, of how you have this 12 around the school to help people explain that if they 13 are feeling sad or hurt, they need to tell somebody? 14 A. In a very simple way, if you are feeling sad, yes. 15 Q. Then SST000087, please, Ralph. 16 Again, this is -- again, it looks to me in very 17 simple terms, in signing terms, talking about how 18 students can express being safe, and then, as you say, 19 talking about consent and privacy. 20 So again, is this something which is widely visible 21 throughout the school? 22 A. Very, very much so, across all buildings. 23 Q. Could you tell me what the mood barometer is? My 24 understanding is, especially with those students who had 25 the most severe communication difficulties -- so we</p> <p style="text-align: center;">Page 160</p>

1 described some pupils who were using the objects of
 2 reference, for example, or if they are not able to
 3 verbalise and they are not able to sign, as you said and
 4 as Dame Christine said, every child can communicate.
 5 What does the mood barometer do and how does that help?
 6 **A. So the mood barometer is one of our tools to find a way
 7 of communicating with the children so they can have the
 8 voice, so they are very much in the centre of our
 9 attention.**
 10 Mood barometer is used very often, so it is not the
 11 one a day or once a week, like you go to the
 12 supermarket, "Are you satisfied today?", when you bought
 13 a bottle of milk, it is really on every -- activities
 14 which is finished, or part of the day, when it is
 15 finished, you will ask the child what the child is
 16 feeling, if it is feeling safe, happy, sad.
 17 This is recorded, and then the mood barometer is
 18 linked to our behaviour watch, where we are analysing
 19 what is the impact, is there any connection between the
 20 child's mood, and their level of incident? Can we
 21 prevent that incident? What is the tolerance of these
 22 children? And trying to find a space where there is
 23 very low anxieties and the children are ready to learn.
 24 Q. If a child cannot tell you even by signing, is there
 25 an ability by observation to judge mood and does that

Page 161

1 the day. But it is not only about recognising what is
 2 happening, but what can be done in order to remediate
 3 the challenging behaviour or other things.
 4 Q. You said you had 44 children, you would be able to look
 5 at the data and see when that child's mood was changing
 6 from --
 7 **A. Yes, and it sort of allows you to look at a number of
 8 individual staff. So, for instance, you might pick up
 9 if somebody has a lesson with this particular teacher,
 10 they like him very much, or her very much, or don't like
 11 him, so it is a question, what are you doing that you
 12 like or not like, what sort of technique you are using
 13 in order to have a good relationship and learning
 14 environment?**
 15 Q. So you can link it to staff behaviour as well as --
 16 **A. That's right, it is a very broad area of our interest
 17 and it is really about analysing the data and filtering
 18 what we want to know or what is happening to the child.**
 19 Q. Is that considered safeguarding data, is it something
 20 the designated safeguarding lead would be looking at?
 21 **A. Yes.**
 22 Q. Can you explain to the chair and panel what the four Rs
 23 are?
 24 **A. If I may, I would like to start that our biggest asset
 25 is the staff. And we are providing a Safe Recruitment**

Page 163

1 factor into the system as well?
 2 **A. Yes, observation is one of the biggest parts in mood
 3 barometer. Yes, we are definitely relying on what the
 4 child is telling us, but well trained staff, their voice
 5 is extremely important to us too, because these are the
 6 people who are working with the children all the time,
 7 so they know them very well. So it is the observation
 8 of, maybe flicking the eye or jumping or some little
 9 signs which show the happiness or maybe distress, maybe
 10 pain, but the observation element is really very
 11 important and highly rated.**
 12 Q. In the most practical sense, how is all of this data
 13 captured? Because it sounds very useful, but is it --
 14 is the mood barometer captured by some sort of computer
 15 package that can all be analysed?
 16 **A. Yes, these are electronic ways of gathering data and
 17 analysing the data, yes.**
 18 Q. So if a child was displaying very unusual behaviours and
 19 we know that sometimes the only way that children can
 20 express that they are suffering abuse is by behavioural
 21 changes. So if a child's behaviour changed very
 22 differently, you would feel that that would be something
 23 picked up by this --
 24 **A. That's right, it is very much a very detailed analysis
 25 of what is happening to the child at a certain point of**

Page 162

1 before even people arrive, and then there is a two-week
 2 induction programme where the safeguarding is really at
 3 the top of our agenda, then the induction in the
 4 department and, once again, the details are done there.
 5 **So the culture of being open, it is really quite
 6 crucial, so it is really allowing people to raise any
 7 concerns and have the immediate access to the employee
 8 arrangements for any sort of incident or when looking
 9 after the staff or of their wellbeing.**
 10 **And, on our ID cards, we do have a phone number to,
 11 for raising concerns, and also the famous four Rs --**
 12 Q. Maybe we could have a look at SST000085_001 and _002 --
 13 it may be this will help, Ms McCall. This,
 14 I understand, is your staff card and if we could have
 15 the next page, please, not that one -- yes.
 16 If we could enlarge that. So, as I understand it,
 17 this is the -- these are the four Rs, if you like:
 18 "Recognise the signs and indicators of abuse;
 19 "Respond as soon as possible;
 20 "Record everything you have seen, heard said or any
 21 actions; and
 22 "Refer to the designated person", and the mobile
 23 number is there.
 24 **A. So once again, it's very similar to our posters for the
 25 children. This is really for the staff. And not only**

Page 164

1 **to have the posters around the schools and different**
 2 **buildings, but also every member of staff has to wear**
 3 **their ID card and, on the back of this card, there are**
 4 **the four Rs and the phone number for the designated**
 5 **person to talk to, so there is no delay in terms of**
 6 **giving permission to people to report.**
 7 Q. The chair and panel have been hearing about a system
 8 called "neutral notification", or "low-level reporting",
 9 which I am sure you are familiar with.
 10 It sounds, from your witness statement, that that is
 11 something which is in operation in the Royal School
 12 Manchester; is that right?
 13 **A. That's right. So we are not prescribing to the staff**
 14 **what is to raise their concerns for or not; we are**
 15 **saying that if you feel uncomfortable, if you feel that**
 16 **there is something not right, tell us about this because**
 17 **we can do something about this and, if it is not**
 18 **a safeguarding issue, we can refer it to the Health &**
 19 **Safety or act in a different way.**
 20 **But the main thing is that people are comfortable**
 21 **with reporting and the more they report, the better.**
 22 **So we are not -- over harm, we are not cross that**
 23 **people are reporting and, actually, the culture of**
 24 **reporting is really very high in Seashell Trust.**
 25 Q. Is that mandatory? I think one of the features of the

Page 165

1 Dame Christine Lenahan that disabled children are often
 2 infantilised, and from Professor Hackett that there is
 3 not very much good sexual education for disabled
 4 children, which is disempowering, but might also have
 5 an effect on sexually harmful behaviour amongst disabled
 6 children as well. We are also aware there is a lack of
 7 guidance or specific guidance for disabled children at
 8 a national level.
 9 Can you tell us what work you have done with your
 10 cohort of pupils to develop a -- first of all, do you
 11 have a sex and relationships education and how have you
 12 developed it?
 13 **A. Well, I have to say that although the relationship and**
 14 **sex education curriculum will be in place,**
 15 **in September 2020, for Seashell Trust it really is**
 16 **nothing new, because relationships and sexual education**
 17 **was always part of our life curriculum.**
 18 **So we have been, since 1990s, providing the**
 19 **individualised curriculum around relationships and also**
 20 **about the sex education, and it is really quite**
 21 **a dynamic curriculum for us, depending on the needs of**
 22 **the child, the communication, the level of**
 23 **understanding, so it is really adapted to the needs of**
 24 **the children.**
 25 **It is not -- it covers the body parts, it covers the**

Page 167

1 system, as we understand it, as explained to us by
 2 Marcus Erooga, is that it has to be mandatory, if you
 3 like, for all staff to report concerns, however small
 4 they might be. Is that the system which is in operation
 5 or is it more of a sort of training --
 6 **A. I can't say for our staff it is mandatory, but**
 7 **definitely the culture creates the atmosphere that it is**
 8 **the right thing to do. And I think through our**
 9 **specialism and Safe Recruitment, we have the confidence**
 10 **that people are not hiding things and they'd rather talk**
 11 **about this openly. And obviously the actions are taken**
 12 **and the -- the things that we did, it is part of our**
 13 **daily life.**
 14 Q. The cause for concern forms that you have described, are
 15 they something which are analysed as well at the
 16 fortnightly meetings with the DSL?
 17 **A. That's right. Unless there is a higher level of**
 18 **safeguarding done, then members of the safeguarding**
 19 **group will receive that notification on the emails, so**
 20 **they can look at this straight away without waiting**
 21 **two weeks for the meetings. So it is immediate actions.**
 22 Q. I would like to look at the sex and relationships
 23 education for your pupils.
 24 I know you have been listening to some of the
 25 evidence this week that we have heard from

Page 166

1 **awareness of the body, their hygiene, private space and**
 2 **public space, as well as consent, saying no.**
 3 **So this is really the basics of our curriculum.**
 4 Q. What age range do you have in the Royal School
 5 Manchester?
 6 **A. So we are registered from 2 to 19. To 18 years old.**
 7 **But our oldest at the moment is 8 years old,**
 8 **a child -- sorry, the youngest. The youngest is**
 9 **8 years.**
 10 Q. It might be helpful, Ms McCall to see a concrete example
 11 of this for the chair and panel. Could we have
 12 SST000084 and then we are going to turn to, I think --
 13 actually, if you could just turn to SST000084 and then
 14 I will find the page reference.
 15 Yes, so this is an example -- Ms McCall, this is
 16 an example where a model is used; is that right? This
 17 is the model for a particular lesson. It is only one
 18 lesson out of very, very many lessons which you give
 19 your children about the range of things that you
 20 described.
 21 If we could go to _003, please, Ralph, and could
 22 you -- this is -- so the aim of this lesson, as
 23 I understand it, is to -- well, as is written, is "to
 24 develop understanding of masturbation as a private
 25 activity, to understand how to masturbate and to develop

Page 168

1 body awareness ..."

2 Could we go to pages _008 and _009, Ralph, together.

3 You have described the way you need to differentiate

4 what you are doing for your population of students and

5 earlier you described them learning in context.

6 Can you briefly, perhaps, in relation to what is

7 being done here, tell us why it is so important for your

8 student population to learn things in context?

9 **A. I think that the key word is children are learning in**

10 **context for us.**

11 **So we have a puppet, where we use British sign**

12 **language or we use signs, so it is a pretty much**

13 **a life-sized teenage type of puppet but the resources,**

14 **we had to adapt the resources, what is commercially**

15 **developed, and actually it is a common sense and a good**

16 **practice in any special schools, that if there are**

17 **commercial resources which are not available, it is for**

18 **the school to do the home-made and adaptation to their**

19 **resources.**

20 **So this is what happened to -- we call him Spencer,**

21 **the puppet, who sort of represents the peer group to our**

22 **children. One of the most important things is that the**

23 **children cannot associate a puppeteer with a teacher, so**

24 **for us, it is really very important that the teacher**

25 **cannot be recognised through their rings or watch, it is**

Page 169

1 children, because they are not given education about sex

2 and relationships, will, for example, display sexualised

3 behaviours in public. So my understanding of this

4 resource in particular is that it teaches your children

5 this is something -- we have not gone through the whole

6 of the resource, but in very concrete terms, what is

7 public and what is private; is that correct?

8 **A. That's right, and this is sort of the main -- it is not**

9 **about the technical actions of masturbation, but it is**

10 **more about knowing what is socially acceptable. It is**

11 **okay to feel --**

12 Q. Acknowledging their right to sexuality?

13 **A. Acknowledging the right, and accepting and not judging,**

14 **so once again, the session leader will have a very sort**

15 **of straight face without any emotions, so it is really**

16 **giving the children some privacy, but also choosing --**

17 **feeling the body, what is happening to them, and for**

18 **these children it is extremely difficult -- I suppose it**

19 **is difficult for any child to know what is private and**

20 **what is public.**

21 **But for these children, the sociable acceptable**

22 **roles are probably even more difficult to comprehend.**

23 MS BICARREGUI: Thank you very much.

24 Chair, I notice the time. Would this be a good time

25 to have a break?

Page 171

1 **very much neutral, behind --**

2 Q. In fact, we can see here the layout of the room. So the

3 teacher is not visible -- essentially, to cut through

4 it, you are teaching about, you go -- if you want to

5 masturbate, you go to your room, in a private space, and

6 that is --

7 **A. The important thing is there is a lot of work done in**

8 **preparation, room preparation, before children even**

9 **arrive to the room. It will be very small group of**

10 **children who will come with the support -- so the**

11 **learning support assistant, and all of our children are**

12 **supervised all the time. So the room cannot be big in**

13 **terms of how many people are there, so it will be**

14 **a small group of maybe two or three students, or it**

15 **might happen that there is only one student with the**

16 **learning support assistant.**

17 **Now the puppeteer cannot be seen. The curtain is**

18 **there, and there is also a session leader who is almost**

19 **like a communicator to the puppeteer to say how -- what**

20 **is happening on the other side of the curtain. So to**

21 **emphasise certain things and deliver the session in**

22 **a sort of smooth way depending on the dynamic of the**

23 **room.**

24 Q. To put it into context about what we have been listening

25 about or what we have been hearing, that many disabled

Page 170

1 THE CHAIR: Yes, we will return at 3.15.

2 (3.00 pm)

3 (A short break)

4 (3.15 pm)

5 MS BICARREGUI: Thank you very much, chair.

6 Ms McCall, we are going to turn now to look at some

7 specific issues which arose between around 1999 and

8 2002. That was a period when a number of concerns were

9 raised about practices by staff members at the Royal

10 School Manchester, wasn't it?

11 **A. That's correct.**

12 Q. Now, I am going to -- chair and panel, Ms McCall has

13 done a very detailed statement about three staff

14 members, F2, F3, and F11. I am going to ask Ms McCall

15 to explain to us issues relating to F3 and then, chair,

16 I will ask you, unusually, to adduce Ms McCall's

17 statement in relation to details in relation to F2 and

18 F11.

19 So Ms McCall, the NSPCC became involved; that is

20 right, isn't it?

21 **A. That's correct.**

22 Q. They investigated, essentially, the concerns about

23 various staff members?

24 **A. I think how it -- I know how it started, from available**

25 **documentation, that the trust commissioned two**

Page 172

<p>1 consultants to sort of investigate and help the school 2 to provide better safeguarding arrangements. 3 And during that, for some reason, the two 4 consultants has noticed some poor practice to the level 5 that they asked Stockport Local Authority to 6 investigate, and then Stockport Local Authority asked 7 the NSPCC to carry on the investigation. 8 Q. There was a number of allegations at that point, so 9 physical abuse, emotional abuse, unexplained injuries, 10 medical mismanagement and child sex abuse concerns; that 11 is right, isn't it? 12 A. That's right. 13 Q. As I said, Ms McCall, I am only going to be asking you 14 questions in relation to F3 today, but the chair and 15 panel do have your statement in relation to the other 16 two staff members. 17 So F3 was a longstanding member of staff when 18 concerns were raised about his behaviour, which 19 specifically were that he was regularly showering naked 20 with pupils in the school's communal showers until they 21 closed, and that he had also assisted pupils with 22 personal hygiene. Is that your -- 23 A. That's correct, this is my understanding. 24 Q. We are not going to go through, Ms McCall, the very 25 detailed NSPCC report, but I know that you have read</p> <p style="text-align: center;">Page 173</p>	<p>1 that report? 2 A. That's right. 3 Q. In that report, F3 was interviewed, wasn't he, by the 4 NSPCC investigators on a number of occasions; do you 5 recall that? 6 A. That's right. 7 Q. Do you also recall that the mother of one of the 8 children with whom it was said F3 was essentially 9 showing how to do intimate personal hygiene, there was 10 an interview with her conducted by the NSPCC, wasn't 11 there, as part -- 12 A. That's right. 13 Q. So if we could just quickly get up, Ralph, 14 SST000042_007, and right at the top paragraph, we see -- 15 again, as I say, I am not going to go through this line 16 by line, the allegation that RS-F3 continued hygiene 17 practices with RS-A201, despite a request by his mother 18 that he cease this practice with her child as this 19 caused him distress. 20 RS-F3 continued with a practice which was 21 distressing a child who had been sexually abused against 22 the express wishes of the child's parents. So that was 23 one of the allegations in the NSPCC report, wasn't it? 24 A. That's right. 25 Q. If we could go to _009, please, Ralph.</p> <p style="text-align: center;">Page 174</p>
<p>1 These are the recommendations in respect of F3: 2 "In view of the considered unsuitability of RS-F3 to 3 work with children, the Royal School for the Deaf [at 4 that point] Manchester, must consider carefully the 5 completion of the disciplinary process and it was also 6 recommended that the appropriate authorities were made 7 aware of the view that RS-F3 is considered a person 8 unsuitable to work with children, and consideration is 9 given to referring him to the Protection of Children Act 10 List." 11 Do you see that? 12 A. That's right. 13 Q. Disciplinary proceedings then followed, didn't they? 14 A. That's correct. 15 Q. The outcome of that was that RS-F3 was dismissed? 16 A. That's correct. But also, I would add to it that during 17 the strategy meeting, there was a unanimous decision and 18 an agreement that F3 was not suitable to work with 19 children. 20 Q. That is a very good point, actually, Ms McCall. If we 21 could get up SST000062, please, Ralph. 22 You talk about an interagency, or a multi-agency, 23 strategy meeting that was held separately to discuss, if 24 you like, the NSPCC report and we see that there. 25 If we could go to the next page, please. Yes.</p> <p style="text-align: center;">Page 175</p>	<p>1 Again, the conclusion -- we see the conclusion of the 2 NSPCC and then the disciplinary proceeding. Sorry, I am 3 just looking for the conclusion that he should no longer 4 work with children and there it is at the top: 5 "This conclusion was agreed by all present at the 6 meeting." 7 So the NSPCC say that and then the interagency 8 strategy meeting say the same thing? 9 A. That's right. 10 Q. And then -- and, again, we will not go to the details 11 but at SST000035, we see that RS-F3 was dismissed. If 12 you could go to the next page, please, Ralph. 13 It goes through in detail and it also says at the 14 bottom: 15 "I also need to let you know I have been contacted 16 by the DfE regarding List 99 ..." 17 Pausing there, Ms McCall, List 99 is a list of 18 people deemed inappropriate to work with children; is 19 that your understanding? 20 A. That's right. 21 Q. "... and that I am duty bound to make them aware of the 22 outcome of the meeting of 20 August, and they will be in 23 touch with you in due course." 24 So a very strong recommendation from the NSPCC, 25 a gross misconduct dismissal and a multi-agency meeting</p> <p style="text-align: center;">Page 176</p>

1 all saying that RS-F3 is not suitable to work with
 2 children?
 3 **A. That's right, and also the trust's position was exactly**
 4 **the same.**
 5 Q. I suppose, looking at it with your eyes now and with
 6 your cohort of pupils, the vulnerability of your cohort
 7 of pupils, what do you say about the conduct of
 8 showering with pupils and engaging -- displaying --
 9 demonstrating personal hygiene to pupils in that way?
 10 **A. Well, myself, as well as a trust position on this one,**
 11 **now in current situation, this is unacceptable behaviour**
 12 **and it is very clear-cut, it cannot be tolerated.**
 13 Q. When you looked at the paperwork from the time, were you
 14 satisfied that it would have been clear to RS-F3 at the
 15 time that this was behaviour that would not be tolerated
 16 in the Royal School Manchester?
 17 **A. Well, from the documentation available, what I can see,**
 18 **there are some inconsistencies within the way F3 was**
 19 **trying to portray it, the actions, his actions. So this**
 20 **was something which is really quite difficult to**
 21 **understand and one -- at one time, he accepts the**
 22 **allegation and accepts that this is not the right thing**
 23 **to behave. On the other hand, later on, he changes his**
 24 **views on that.**
 25 Q. Okay.

Page 177

1 inappropriate physical contact with children in his care
 2 while showering with them naked and demonstrating
 3 intimate personal hygiene."
 4 It goes through a set of reasoning, the conclusion
 5 of which is that he should be added to the Protection of
 6 Children Act List.
 7 Is that your understanding of this document from the
 8 Department of Health?
 9 **A. That's correct.**
 10 Q. It was a very clear decision?
 11 **A. Yes, at the time, yes.**
 12 Q. Now, we -- you know and it is in your statement, that,
 13 in fact, RS-F3 was not placed on the Protection of
 14 Children Act List, was he?
 15 **A. Yes.**
 16 Q. The reason for that -- Ralph, if we could get up
 17 DBS000099. Now, this is an internal memo within the
 18 Department of Health, and if we could go to the first
 19 bit of black, sort of halfway down, it says,
 20 "I think" -- sorry, just above that, please Ralph, sorry
 21 the first bit:
 22 "I think I would be content to carry this case
 23 through under the Protection of Children Act scheme but,
 24 before giving more consideration to this, would you
 25 please establish the position re List 99?"

Page 179

1 Now, at this point, there is a referral to the
 2 Department of Health, for him to be considered for the
 3 Protection of Children Act List and also a referral
 4 which the Department for Education had set in motion for
 5 him to be considered for List 99; is that right?
 6 **A. That's correct, and if I may add in the context that,**
 7 **in October 2000, the POCA reporting requirements came to**
 8 **light and this was the time that maybe people didn't**
 9 **know exactly how it works or what should be done from**
 10 **the Department of Health position and then List 99 from**
 11 **the education part.**
 12 Q. Ralph, if we could get up DBS000126, this is the final
 13 decision from the -- well, the final decision, the
 14 decision that the Department for Health came to in
 15 relation to RS-F3. Again, the allegations are that he
 16 showered naked with children and ignored a request from
 17 the mother of one of the children to cease showering
 18 with her son while he was in care, and "demonstrated
 19 intimate personal hygiene with a resident", et cetera.
 20 If we could go to the next page, please, thank you.
 21 At the bottom, "Are we of the opinion -- if you could go
 22 down, please Ralph:
 23 "Are we of the opinion that the person is unsuitable
 24 to work with children? He has clearly carried out his
 25 duties in an inappropriate manner which resulted in

Page 178

1 So again, my understanding of that, Ms McCall is
 2 that they were -- they thought they would put him on the
 3 POCA list, but they ought to check about List 99.
 4 It says:
 5 "He was employed by the Royal School for the Deaf.
 6 He was not a teacher, but List 99 exists to cover all
 7 who work in educational establishments, so please ask
 8 the DfES if they considered this case and with what
 9 result."
 10 Then, if we could get up DBS000108. Now, this is
 11 a memo between the Department of Health and the
 12 Department of Education. We see, at the top, the
 13 Department of Health saying that they had not been able
 14 to make consideration in respect of the POCA, and ask
 15 whether the DfES could refrain from issuing
 16 a notification in respect of List 99:
 17 "Mr Atkinson said the DfES were not intending to
 18 place RS-F3 on List 99, but he was happy not to issue
 19 any notification until early next week."
 20 Do you see that?
 21 **A. Yes.**
 22 Q. Then there's a further telephone conversation, which
 23 says -- which makes clear that the DfES have the same
 24 material -- so they were looking at the same material we
 25 have looked at, albeit very briefly -- but they consider

Page 180

1 there is enough doubt about the allegations to justify
 2 not including him on List 99.
 3 Their view is that showering naked with children was
 4 part of the culture at the time and the other
 5 allegations have not been substantiated sufficiently.
 6 Then it goes on to say:
 7 "... asked if they had any guidelines as to what
 8 criteria they use when considering referrals to List 99
 9 but Mr Atkinson said there are none."
 10 So they will be notifying RS-F3 next week.
 11 So they have decided in the Department for
 12 Education, if you like, that they are not going to put
 13 RS-F3 on List 99. What is the result of that in terms
 14 of the decision of the Department of Health? Can you
 15 help us with that Ms McCall?
 16 **A. So F3 has been temporarily placed on the POCA list, so**
 17 **from the Department of Health, but because – my**
 18 **understanding is, because the Department of Education**
 19 **make the decision of not putting on the List 99, the**
 20 **Department of Health wrote to us saying that, actually,**
 21 **this is a matter for a Department of Education rather**
 22 **than Health. So F3 was in between the two branches and**
 23 **it appears that the two organisations, the Department of**
 24 **Health and the Department of Education, although they**
 25 **had exactly the same information, there was a lack of**

Page 181

1 **A. Yes, I mean, once again, it is unacceptable, at this --**
 2 **currently, it is not acceptable. We would have held**
 3 **exactly the same views as we did 20 years ago, that this**
 4 **behaviour is not acceptable, the person is not fit to**
 5 **work with children, regardless if it is in the care**
 6 **services or education services, as a local learning**
 7 **support assistant. So we would have a very strong**
 8 **recommendation and follow this through, again, that this**
 9 **person should be put on the list.**
 10 Q. There were inconsistencies, weren't there, between
 11 things said in representations and things which you had
 12 available to you, as the trust, in terms of the
 13 disciplinary hearing?
 14 **A. That's right.**
 15 MS BICARREGUI: Thank you very much, Ms McCall. I do not
 16 have any further questions for you. But if you could
 17 stay there, the chair and panel may have some?
 18 THE CHAIR: No, we have no further questions. Thank you
 19 very much Ms McCall.
 20 **A. Thank you.**
 21 MS BICARREGUI: Chair and panel, I am handing over to
 22 Ms Scolding.
 23 MS SCOLDING: Chair and panel, before we swear the next
 24 witness, it is only right that I should record that
 25 Ms Sharpling has realised this afternoon she has met

Page 183

1 **clarity, criteria, when to put people on List 99.**
 2 Q. Thank you. The trust, at the time, queried this
 3 decision of the Department of Health?
 4 **A. Yes, we did.**
 5 Q. But there was no appeal mechanism, if you like, to do
 6 anything about it?
 7 **A. That's correct.**
 8 Q. Thank you, Ms McCall.
 9 There are some other questions in relation to the
 10 DfES placing him on the list, but essentially, if
 11 I could shortcut them, but if you could tell me if you
 12 concur with this reasoning, the Department for Education
 13 had asked for representations, hadn't it, from F3,
 14 RS-F3?
 15 **A. That's right.**
 16 Q. Those representations came from him in the form of
 17 a letter?
 18 **A. Yes.**
 19 Q. And you, I think, now have seen those representations?
 20 **A. Yes.**
 21 Q. Based on all of the information that you have seen from
 22 the trust, if you had had the chance to make
 23 representations on what was said, would the trust have
 24 had anything to say about the representations made by
 25 RS-F3?

Page 182

1 Ms Young once before. Ms Sharpling, besides, obviously,
 2 being a member of your panel, is also one of
 3 Her Majesty's Inspectorate of Constabulary and Ms Young
 4 was at one time, although not in her current role, chief
 5 operating officer of HMIC.
 6 In that connection, both Ms Sharpling and Ms Young
 7 identify they have met each other during the course of
 8 their business on one occasion.
 9 In my respectful submission to you, I do not think
 10 this raises any causes for concern but if any core
 11 participant wishes to raise or make any observations,
 12 please could they do so now?
 13 Thank you.
 14 THE CHAIR: Please proceed.
 15 MS SUSAN YOUNG (sworn)
 16 DR SUZANNE SMITH (sworn)
 17 Examination by MS SCOLDING
 18 MS SCOLDING: Good afternoon Ms Young and Dr Smith. Thank
 19 you very much for coming.
 20 I just have a few preliminary issues.
 21 Firstly, this is not a test of memory, you have
 22 witness statements and various other documents in front
 23 of you, please feel free to refer to them.
 24 Secondly, although we are not due to have a break
 25 before the end of proceedings today, we can stop at any

Page 184

1 time and for any reason, please just do indicate that
2 you wish to do so.
3 Thirdly, as I have already indicated, you should
4 both have paper bundles in front of you, with your
5 witness statement and some other documents.
6 There is also a screen. Any document that I am
7 going to refer to in any detail will come up on that
8 screen as well.
9 Please, again, let me know if there needs to be any
10 alterations or adjustments to the vision.
11 Lastly, you are operating and giving evidence
12 together. It is sometimes unfortunately known as being
13 in a "hot tub".
14 I am going to direct my questions at the person
15 I think is best able to answer them but I recognise I am
16 not the expert in this field, so please do let me know,
17 and if either or both of you feel or wish to comment,
18 then, again, please feel free to intervene.
19 So turning now, first to Ms Young, could I ask you
20 to turn behind tab A/1 of your bundle, please.
21 Chair and panel, it is at F/2 -- I think it is at
22 F/1 tab 8 and F/1, tab 9 -- Ms Young at tab 8 and
23 Dr Smith at tab 9 of either F/1 or F/2. Thank you.
24 Apologies. Sorry.
25 You have now had a chance to get your witness

Page 185

1 Service. Therefore, you put into operation the policy
2 which Ms Young and the Home Office set; that's right,
3 isn't it?
4 DR SMITH: Yes, it is.
5 MS SCOLDING: You have approximately 27 years' experience in
6 the sector of safeguarding and you have a doctorate in
7 child protection.
8 DR SMITH: That's right, yes.
9 MS SCOLDING: I am going to look to Ms Young first and I am
10 going to apologise in advance if any of the questions
11 I ask seem incredibly simple, but this is a relatively
12 complicated area of law, so we want to try and establish
13 the structure, and then I am going to pass to Dr Smith,
14 but obviously that doesn't mean you cannot intervene at
15 any time.
16 So firstly, you are the policy element, in effect,
17 along with the Ministry of Justice, the Department for
18 Education and the Department of Health and Social Care
19 responsible for identifying policy in respect of the
20 Rehabilitation of Offenders and Safer Recruitment in
21 terms of vetting and barring; is that right.
22 MS YOUNG: Yes, in terms of Disclosure and Barring.
23 MS SCOLDING: As far as the issue of convictions are
24 concerned, obviously the Rehabilitation of Offenders Act
25 1974 is the main statute. Can you -- that is what

Page 187

1 statement up, can I just confirm that you have signed
2 this witness statement?
3 MS YOUNG: Yes.
4 MS SCOLDING: And it is true, to the best of your knowledge
5 and belief?
6 MS YOUNG: Yes.
7 MS SCOLDING: Ms Young, just to introduce you, I understand
8 you are the director of the Public Protection
9 Directorate within the Home Office; is that right?
10 MS YOUNG: That's correct.
11 MS SCOLDING: Therefore, your policy responsibilities
12 include that concerning the Disclosure and Barring
13 regime, amongst other things?
14 MS YOUNG: Yes, amongst other things.
15 MS SCOLDING: Right and Dr Smith, if I can now turn to you,
16 can I ask you that you look behind tab A/1 of your
17 bundle?
18 DR SMITH: Yes.
19 MS SCOLDING: Did you sign this witness statement?
20 DR SMITH: I did.
21 MS SCOLDING: Is it true, to the best of your knowledge and
22 belief?
23 DR SMITH: It is.
24 MS SCOLDING: You are, Dr Smith, as I understand it,
25 director of safeguarding at the Disclosure and Barring

Page 186

1 I would call the disclosure part of the scheme, so we
2 have got the disclosure -- the Disclosure and Barring
3 Service.
4 MS YOUNG: Yes.
5 MS SCOLDING: The D part of the scheme is disclosure.
6 MS YOUNG: That's right.
7 MS SCOLDING: What is disclosure under the scheme? What is
8 being disclosed?
9 MS YOUNG: It is previous convictions, including cautions,
10 under certain circumstances, and then, depending on the
11 level of certificate, also information from police
12 forces -- soft intelligence, if you like -- that is
13 relevant for the certificate that is being issued.
14 MS SCOLDING: Right. Is it only sorts of employers who can
15 ask for the disclosure of a certificate for conviction
16 or with soft intelligence or is it any employer who can
17 ask for that?
18 MS YOUNG: So it is the employer who can ask where the role
19 is a specific role. So, for example, for a standard
20 disclosure certificate, that is for people who are
21 employing in professions such as accountants or
22 solicitors will get a standard certificate; people who
23 are working with children or vulnerable people can have
24 enhanced certificates.
25 MS SCOLDING: I think, if we look at paragraph 11 of your

Page 188

<p>1 witness statement, you set out the four types of 2 certificate. 3 MS YOUNG: That's right. 4 MS SCOLDING: Ralph, that is HOM003302_003. 5 Hopefully -- there we are. And if you wouldn't mind 6 enlarging paragraph 11, please. 7 These are the four levels of certification and who 8 can apply for them. So we have the basic certificate, 9 so that is anyone can apply -- anybody can apply for 10 that? 11 MS YOUNG: Yes, and those are applied for by the person who 12 is the person themselves, and that can be disclosed by 13 them to anyone that they want to have that information. 14 MS SCOLDING: So I could apply for that basic certificate 15 just thinking, "Well, it would be useful to know if I've 16 got any convictions or any soft intelligence information 17 I have forgotten about", and I could apply for that? 18 I would not have to be employed undertaking a particular 19 role to do so? 20 MS YOUNG: No, you would only get unspent conviction 21 information on that certificate. 22 MS SCOLDING: "Unspent convictions"? Just so we are clear 23 about what that means. 24 MS YOUNG: That means, under the Rehabilitation of Offenders 25 Act, that sets out those offences, and some offences,</p> <p style="text-align: center;">Page 189</p>	<p>1 after a period of time, will no longer fall to be 2 disclosed to an employer, for example. 3 MS SCOLDING: But as I understand it, and, again, this 4 system is quite complicated about when convictions 5 become spent and when they don't, most serious 6 convictions of sex against children, or adults, are 7 likely never to become spent. 8 MS YOUNG: That's correct. 9 MS SCOLDING: So anything particularly serious, so any kind 10 of offences -- basically, offences of violence, offences 11 of -- and sexual offences, are unlikely to become spent 12 unless they are minor in nature? 13 MS YOUNG: Yes, and also offences where there has been -- 14 custodial sentences over a certain length will not 15 become spent either. 16 MS SCOLDING: Then there are standard certificates which are 17 what you have just explained to me, and that includes 18 both spent and unspent convictions and also cautions? 19 MS YOUNG: Yes. 20 MS SCOLDING: I think, within this inquiry, we know quite 21 a lot about the process of cautioning, so I don't think 22 I need to elaborate on that. 23 Then enhanced certificates, those are -- who 24 basically has to apply, or can apply, for an enhanced 25 certificate?</p> <p style="text-align: center;">Page 190</p>
<p>1 MS YOUNG: So the employer applies through a registered 2 body, employers can themselves be registered bodies, or 3 for employers who perhaps only apply for certificates 4 occasionally, can use a third party registered body to 5 make the application. 6 MS SCOLDING: So is it the case, therefore, that self 7 employed people cannot apply for enhanced certificates. 8 MS YOUNG: That's correct. 9 MS SCOLDING: So if, for example, I were to set up a private 10 tutoring service, it probably wouldn't be a terribly 11 successful one, but if I were to set that up and run it 12 in my home, I would not be able to come to you and say 13 "I would like an enhanced certificate in order so that 14 I can show everybody that there are no problems or 15 I have no blemishes on my record"? 16 MS YOUNG: That's correct. 17 MS SCOLDING: So the only thing that I could get would be 18 a basic certificate, as I understand it? 19 MS YOUNG: Yes. 20 MS SCOLDING: Is that something which should happen? Isn't 21 that an obvious lacuna -- and I may well use the word 22 "lacuna" on a number of occasions. Isn't that a lacuna 23 that particularly, not so much in respect of activity 24 that takes place in school, but activity which might be 25 educationally related that might take place in someone's</p> <p style="text-align: center;">Page 191</p>	<p>1 home -- I'm thinking, firstly, of private tuition and, 2 obviously, what we talked about last week, music 3 schools, isn't that something which is slightly 4 problematic, that self-employed people cannot apply on 5 their own behalf, so to speak. 6 MS YOUNG: So the reason that self-employed people cannot 7 apply on their own behalf is because nobody has the 8 right to see other people's spent convictions. 9 So if you were to have that certificate, if it has 10 nothing on it, then obviously you may well want to show 11 it to other people, but the reason that an employer gets 12 a certificate is so that he or she can make a decision 13 about whether to employ that person or not. 14 So if you are employing yourself, you are asking for 15 information which you already know to make a decision 16 about something which, if you have set up your tutoring 17 company, you have already decided. 18 MS SCOLDING: Okay, but doesn't that leave -- I understand, 19 in terms of the relationship -- of the employment 20 relationship, but I suppose I am thinking about in terms 21 of the assurance of the public-type relationship, in 22 that there is, therefore, a whole class of people that 23 cannot apply for and cannot demonstrate their good 24 standing, so to speak, because of the way the rules are 25 currently constructed.</p> <p style="text-align: center;">Page 192</p>

<p>1 MS YOUNG: So they can apply for a basic certificate and 2 that would show they don't have any unspent convictions; 3 and as we have said, the most serious of those offences 4 would always be on that certificate. 5 So you can prove it to that extent, but, yes, there 6 is no way of getting the enhanced information. 7 MS SCOLDING: And the enhanced certificate, as I understand 8 it, that applies to both individuals which are paid and 9 also voluntary activities. 10 MS YOUNG: Yes, that's correct. 11 MS SCOLDING: So if you are working for a particular 12 employer, if you are an employer or you are working via 13 an agency within a school or a hospital or something 14 like that, you would always need to have an enhanced 15 certificate? 16 MS YOUNG: Yes, that's right. 17 MS SCOLDING: So the next level up, so to speak, is the 18 enhanced certificate with barred list check. 19 That is only for those who are working in regulated 20 activity with children and vulnerable adults, and 21 I suppose the question is, what does "regulated 22 activity" mean in this context? It might be useful for 23 us to go to paragraph 15 of your witness statement, 24 Ralph, it is on the next page, which provides us with 25 the definition in respect of children -- there</p> <p style="text-align: center;">Page 193</p>	<p>1 a definition in respect of adults and there is 2 a definition in respect of children. 3 MS YOUNG: Yes. 4 MS SCOLDING: Can you tell us, in layman's language, who -- 5 when the situation would happen that you would have 6 an enhanced check with a barred list as well? 7 MS YOUNG: There are three elements. So one is around 8 teaching, training, instructing, caring for or 9 supervising children, or providing advice, guidance on 10 physical emotional or educational wellbeing or driving 11 a vehicle only for children, and also looking at work in 12 a limited range of establishments, so places which 13 include schools and colleges, so that is for any role in 14 there. So, for example, cleaning staff in a school 15 would meet the requirement for regulated activity, as 16 long as -- so it is regulated activity if it is done 17 regularly and, for the purpose of the Act, that is more 18 than three times in 30 days, so effectively, if you are 19 doing it once a week, then you are in regulated 20 activity. 21 Then we have also got the definition of relevant 22 personal care or healthcare, so helping with eating and 23 drinking, toileting, washing, bathing. 24 MS SCOLDING: So you have to be performing either a task 25 frequently, so teaching, training, instructing and</p> <p style="text-align: center;">Page 194</p>
<p>1 caring, you have to be doing it frequently, so that is 2 more than three times in a month? 3 MS YOUNG: More than three times in a month. 4 MS SCOLDING: But if you work for a school or a college and 5 you have contact with children, irrespective of how 6 irregularly that might be, you don't have to meet the 7 frequency requirements; is that right? 8 MS YOUNG: So you would meet the frequency requirement for 9 if you were cleaning in a school, but in relation to the 10 personal care aspects, there is no frequency requirement 11 around personal care. 12 MS SCOLDING: Right, okay. 13 So it is not necessarily the most straightforward, 14 shall we say, because it involves identifying, firstly, 15 the role, secondly, the establishment and, thirdly, the 16 frequency -- that's as I understand -- 17 MS YOUNG: Yes. 18 MS SCOLDING: -- how it works. 19 What some people have told this investigation is 20 that there are quite a number of weaknesses within the 21 definition of regulated activities as it currently 22 exists. 23 Firstly, in respect of the frequency element, 24 because, for example, the NSPCC have said to us it is 25 not necessarily about how often it gets done, it is</p> <p style="text-align: center;">Page 195</p>	<p>1 about whether or not that person is in a significant 2 position of trust. So, for example, a bishop -- say, 3 for example, we had an example in the Anglican 4 investigation of a bishop who used to go in and give 5 assemblies, now, he would not qualify under the 6 frequency; however, he was in a position of great trust 7 and he used that in order to try and engage in sexual 8 offending with young boys, so that is a sort of obvious 9 example of a gap. 10 Do you have anything you would like to say about 11 that? 12 MS HUMPHREYS: I think the definition of regulated activity, 13 and the checks that are put in place around individuals 14 are just one part of the safeguarding policies and 15 procedures that need to be in place in any establishment 16 where we are looking after children. So in terms of 17 somebody who is a less frequent visitor in a school, 18 even when they hold a position which can engender that 19 large amount of trust, it is the overall safeguarding 20 practices in that organisation that will help keep the 21 children safe. 22 Also, because, clearly, in order for something to 23 come up on the certificate, the person would have had to 24 do something which was reported to the police or 25 resulted in a conviction and, if there had not been</p> <p style="text-align: center;">Page 196</p>

<p>1 reports made before, then their certificate would be 2 clear. That is why it is important that this is seen as 3 a part of the overall safeguarding of children and not 4 the sole thing to keep them safe. 5 MS SCOLDING: Right. It is also the case that a number of 6 people have identified that this whole definition is 7 quite complicated. I think even the Disclosure and 8 Barring Service themselves have identified in previous 9 evidence to another investigation that there are 10 problems in people understanding what this means, 11 particularly the frequency. I think, people are, like, 12 "Is this three times in 30 days, or how does this 13 work?", and what is meant, for example, by teaching, 14 training, instructing or caring for? It's because, for 15 example, the Independent Schools Inspectorate identifies 16 to us that somebody who is the proprietor of a school 17 would not necessarily fall in the conduct of regulated 18 activity. 19 MS YOUNG: Proprietors of schools are specifically in the 20 changes that were made under the Protection of Freedoms 21 Act were taken out of regulated activity, so they are 22 still eligible for enhanced disclosure checks, but if 23 they were a proprietor of a school that was engaging in 24 any of these activities, say, for example, as the 25 proprietor they were mentoring children around business</p> <p style="text-align: center;">Page 197</p>	<p>1 skills, for example, then they may fall into regulated 2 activity and then would be eligible for the enhanced 3 with barred list check, but proprietors are always 4 eligible for enhanced checks as proprietors. 5 MS SCOLDING: But just not for a barred list check? 6 MS YOUNG: Yes. 7 MS SCOLDING: So technically -- and I understand we are 8 talking about hypothetical situations here -- somebody 9 could have resigned from a job, and I am thinking about 10 some of the examples we had last week, they could have 11 resigned from a job because of a consensual sexual 12 relationship they had with somebody who was 16, before 13 the law changed, but who worked at the school where they 14 were employed; they would have resigned, and there 15 wouldn't have been a criminal investigation because it 16 wasn't a criminal offence. However, they would, or they 17 may, have been placed on the barred list, or on the 18 predecessor of the barred list, but there would be no 19 way, if they then became a proprietor of a school, for 20 anybody else to know that that had been the position. 21 Am I right or am I just barking completely up the 22 wrong tree? 23 MS YOUNG: So, theoretically, that is possible. I think 24 that the number of occasions where somebody would be on 25 the barred list but without there being the other</p> <p style="text-align: center;">Page 198</p>
<p>1 information is an increasingly reducing number. 2 MS SCOLDING: Yes. It is an increasingly reducing number 3 but it is still likely to be a significant number of 4 people whose activities are, shall we say, somewhat 5 dubious but possibly not criminal? 6 MS YOUNG: So, potentially, I don't have the figures of the 7 number of people who would be on a barred list but would 8 have nothing on an enhanced disclosure certificate. 9 MS SCOLDING: That may well be something that it would be 10 useful to be supplied, to work out whether or not it is 11 something which is more a theoretical than a real, but 12 I think that is something that has been raised by 13 a number of organisations and institutions. 14 The other two areas which had been in regulated 15 activity but which were removed by the 2012 Act were 16 supervised volunteers working in specified places. So 17 now, if you are the subject of supervision -- and we 18 will come on to talk about what supervision means in 19 a moment -- you will not be the subject the barred list 20 check. You still have to have the enhanced disclosure 21 bit, so you have the "D" bit but not the "B" bit; that 22 is right, isn't it? 23 MS YOUNG: So if the person who is employing you, or 24 engaging you as a volunteer, has established you that 25 the supervision in their view is sufficient for you not</p> <p style="text-align: center;">Page 199</p>	<p>1 to be in regulated activity, then you don't need to be, 2 but they have to be -- they have to satisfy themselves 3 using their professional judgment that that supervision 4 meets the safeguarding needs for their establishment and 5 the situation which you are volunteering in. 6 MS SCOLDING: Right. 7 If we could go to paragraph 23, please, Ralph, and 8 that the previous document HOM003302_006, please. 9 This is sets out what supervision is. Now, there is 10 no definition under the statute as to what supervision 11 is, as I understand it? 12 MS YOUNG: No. 13 MS SCOLDING: That is right. 14 But the Act simply says there must be supervision by 15 a person who is in regulated activity; the supervision 16 must be regular and day-to-day, and the supervision must 17 be reasonable in all the circumstances. 18 MS YOUNG: Yes. 19 MS SCOLDING: Now, I am assuming that operates on the basis 20 that everybody is going to behave well and be cautious? 21 MS YOUNG: So it operates on an expectation that people with 22 responsibility for safeguarding children will take those 23 professional responsibilities seriously, and the changes 24 that were made in the Protection of Freedoms Act were 25 about the government expecting that professionals who</p> <p style="text-align: center;">Page 200</p>

1 are engaged in safeguarding are best placed to make
 2 determinations around whether that supervision is
 3 suitable or not.
 4 MS SCOLDING: Well, I understand from your witness statement
 5 that the government in fact said they were to review the
 6 criminal records and vetting and barring regime and
 7 scale it back to common sense levels.
 8 I suppose it begs the question whose common sense,
 9 really, because, from different parts of the lens, so
 10 from a school angle, they want to be as clear as
 11 possible that people who are entering their
 12 establishment are safe --
 13 MS YOUNG: Yes.
 14 MS SCOLDING: -- to the most significant degree, from other
 15 people who might be entering that school -- and I think
 16 I remember at the time there was quite a big debate
 17 about famous authors who came into school and they
 18 indicated their concern about having to be subject to
 19 the DBS checking regime. They thought that it was
 20 an infringement of their responsibilities.
 21 I suppose the question that lots of people have
 22 raised to us is whether or not the 2012 Act really
 23 scaled back too far on the absolute need to try and keep
 24 children as safe as possible within a school context.
 25 MS YOUNG: So I think that the 2012 Act, really the main

Page 201

1 was the Sunita Mason Review, which made recommendations
 2 in that respect, and many of the changes which were put
 3 forward in the Protection of Freedoms Act came from the
 4 recommendations in the Sunita Mason Review.
 5 MS SCOLDING: Can we go back to the issue of supervision,
 6 which we understand here, and it says quite clearly, it
 7 must be supervision, it must be there, and statutory
 8 guidance, which is published, as I understand it, by the
 9 Department for Education, sets out what is meant by
 10 "supervision". So can we have a look at HOM000032_083,
 11 please, Ralph, and can we go to page 2, please.
 12 So that identifies what the guidance says: it must
 13 not be concentrated on the first few weeks, it must take
 14 place on an ongoing basis, reasonable depends on all the
 15 circumstances including their age, their number, who
 16 else is there, the nature of the individual's work and
 17 in law and organisation, because they are supervised, is
 18 not in regulated activity.
 19 So, again, it largely relies on the good judgment
 20 and discretion of the individuals concerned?
 21 MS YOUNG: Yes.
 22 MS SCOLDING: Now, obviously this inquiry is largely focused
 23 upon individuals who don't exercise good judgment when
 24 it comes to issues concerning the safety of children in
 25 one way or another.

Page 203

1 effect that it had was to not put into place some of the
 2 things which the Safeguarding Vulnerable Groups Act had
 3 brought in in 2006 which had not yet been implemented.
 4 So that was a scheme for registration for anybody
 5 involved in regulated activity, and then ongoing
 6 monitoring of those individuals, and then a separate
 7 scheme for those with less contact with children and,
 8 when they were talking about scaling back to sensible
 9 proportions, it is predominantly around not bringing in
 10 some of those provisions which had been made in the
 11 2006 Act.
 12 MS SCOLDING: But of course some of those provisions which
 13 were made in the 2006 Act, to do with registration and
 14 regulation, precisely came out because largely of the
 15 Bichard Inquiry and the Singleton Review, and various
 16 other reviews, where there had been significant concerns
 17 expressed about the absence of safer checks.
 18 MS YOUNG: Yes.
 19 MS SCOLDING: So, you know, the sector might say to you,
 20 "Yes, but we wanted those; the reason that the Act got
 21 passed in the first place was because we wanted it and
 22 we thought it was needed"; it was not responsible for
 23 the government, therefore, to remove that simply on the
 24 basis of something which is alleged to be common sense?
 25 MS YOUNG: So it wasn't done just on common sense. So there

Page 202

1 Do you think maybe the approach that is taken here
 2 is slightly naive, given the reality of situations where
 3 people will try and evade the rules or think they don't
 4 apply to them, and that there should be a better
 5 definition of supervision, or in fact, as the NSPCC
 6 suggests, that in fact everybody should be the subject
 7 of checks if they are working either in a paid or
 8 a voluntary capacity within a school setting,
 9 irrespective of the level of supervision they have?
 10 MS YOUNG: So I think that a lot of things have changed
 11 since some of the evidence which I know that the inquiry
 12 has heard, and certainly I think that the number of
 13 single points of decision or single points of failure
 14 within systems are less than there were before.
 15 I think that the government, in making the changes
 16 that it made in 2012, was looking to enable people with
 17 responsibility for safeguarding to make the decisions
 18 that they felt were appropriate and in the interests of
 19 the child and to make sure that they thought about this
 20 as part of safeguarding of children as a whole, in
 21 totality.
 22 So I don't think it was naivety, I think it is about
 23 respecting the professionalism of those with
 24 safeguarding responsibility.
 25 MS SCOLDING: But if one looks at the guidance and one sees,

Page 204

<p>1 it almost identifies -- because it says, "Supervision is 2 regular or day-to-day", but then, if one looks at the 3 statutory guidance, I would suggest that looks more like 4 what I might call constant supervision, rather than 5 regular supervision, because regular supervision might 6 be popping in once a week. What you really mean is that 7 someone is around who is in regulated activity for most 8 of the time. 9 MS YOUNG: Yes -- yes. 10 MS SCOLDING: So wouldn't it be more sensible to refine that 11 definition from regular to something which is slightly 12 more prescriptive in terms of constant supervision, or 13 one can think of plenty of examples from other sorts of 14 statute. Would that be something that you would 15 consider doing or might be helpful? 16 MS YOUNG: In terms of the guidance, then it certainly is 17 something which we could work with the Department for 18 Education to refine their guidance. This is not Home 19 Office guidance. 20 MS SCOLDING: No. 21 MS YOUNG: But -- 22 MS SCOLDING: I suppose the question is whether or not that 23 guidance needs to be reflected in statute? 24 MS YOUNG: So that is not something which I have been asked 25 to consider previously and, clearly, if that were to be</p> <p style="text-align: center;">Page 205</p>	<p>1 a recommendation, then the government would consider 2 that and its implications. 3 MS SCOLDING: Thank you. 4 The last thing I want to ask you expressly -- and 5 thank you very much for your assistance -- is, as I 6 understand it from your witness statement, there are no 7 plans at present to change either the definition of 8 regulated activity, the definition of supervision or 9 provide any additional guidance; is that right? 10 MS YOUNG: So the government is obviously interested in what 11 this inquiry has to say and will seriously consider all 12 the recommendations of this inquiry. 13 In terms of issuing guidance, the Home Office 14 generally doesn't issue guidance around these matters. 15 They will go to the Department for Education, the 16 Department for Health and Social Care, Disclosure and 17 Barring Service issues and amount of guidance. I can't 18 say whether they are planning to issue further guidance 19 on those, but at the moment there are no plans for 20 a review of the definition, the legal definition, of 21 regulated activity. 22 MS SCOLDING: Thank you very much. 23 Dr Smith, thank you for your patience. 24 So you are responsible at the DBS for implementing 25 the policy, in effect?</p> <p style="text-align: center;">Page 206</p>
<p>1 DR SMITH: Yes. 2 MS SCOLDING: You do publish guidance about the operation of 3 the regime and how in practice it works. 4 Now, I am going to ask you the same question I asked 5 Dr Young. Do you think it strikes the right balance at 6 the moment between protecting children and protecting 7 the rights of those who are subject to the regime? 8 DR SMITH: I think that it is a difficult balance to strike 9 and, on the whole, I think, yes, the balance is correct. 10 However, if there was an opportunity to review that 11 and explore that, as Ms Young says, as a result of this 12 inquiry, DBS would be more than happy to contribute to 13 that, using the information that we get from our 14 customers and the insight that we gather. 15 MS SCOLDING: Okay. 16 Now, we had an individual who used to work for the 17 Disclosure and Barring Service, Ms Adele Downey, who 18 provided this inquiry with a witness statement 19 in January 2018, in which she said that the DBS receives 20 regular feedback from customers about how complicated 21 the definition of regulated activity is and which work 22 roles are eligible for which level of disclosure check. 23 Is that still your experience in the middle of 2019? 24 DR SMITH: It is improving. We have undertaken a huge 25 amount of issuing of guidance, undertaking stakeholder</p> <p style="text-align: center;">Page 207</p>	<p>1 engagement events, going across the country to help 2 clarify the definition of regulated activity and we have 3 our customer services department that takes any requests 4 from it. 5 It is still one of the main areas that people query, 6 raise queries with us about, but we are still working on 7 trying to clarify that as much as possible. So we have 8 issued a lot of sector-specific guidance for people to 9 help them apply the definition in different sectors. 10 MS SCOLDING: But, however, do you think it would help if 11 the definition was slightly clearer or if there were 12 more of a bright line rule. At the moment there is 13 a degree of complexity, I think, as we have examined. 14 It might not be as attractive, but would it be easier 15 for you to try to explain it to somebody if you could 16 easily say "You are in"/"You are out"? 17 DR SMITH: Certainly any ideas about simplifying or 18 clarifying it, I would be really happy to work with the 19 Home Office in doing that. At the minute, we have to 20 work with what the policy says. 21 MS SCOLDING: I suppose the question is, do you think it 22 should be simplified, from a personal perspective? 23 DR SMITH: From a personal point of view -- and I am not 24 speaking on behalf of the DBS here -- 25 MS SCOLDING: Yes?</p> <p style="text-align: center;">Page 208</p>

<p>1 DR SMITH: -- I think simplification to some degree would be 2 welcomed. 3 MS SCOLDING: So that would be to make it clearer, to make 4 it easy for people to understand when you are in and 5 when you are out? 6 DR SMITH: And when you are out, yes. 7 MS SCOLDING: Ms Downey also identifies the fact that, once 8 somebody has been placed on the barred list -- so that 9 is the list of people who may not have convictions, but 10 they are a risk of harm, and we will come on to talk 11 about that in a moment -- there are no further powers 12 for you to then follow up if that person is then working 13 in regulated activity? 14 DR SMITH: That's correct. 15 MS SCOLDING: Again, is that something which, from your 16 personal experience or from the DBS, depending on which 17 view, you think would be helpful? 18 DR SMITH: I think it would be really helpful if we had 19 powers at the DBS that could help us share information 20 or have access to information from other departments 21 such as the General Registry Office or HMRC, so that we 22 could establish the level of risk in terms of whether 23 the person is still working in regulated activity. 24 MS SCOLDING: How would that help you or how would help the 25 protection of children, if you were to be able to do</p> <p style="text-align: center;">Page 209</p>	<p>1 that? 2 DR SMITH: If we were to be able to do that, we would be 3 able to inform the police and ask for a prosecution for 4 breach of bar, if a person was barred, but if we don't 5 know, obviously we cannot do that. 6 MS SCOLDING: So the position at the moment is people could 7 be put on the list and, if they breach their 8 condition -- and obviously being put on the list 9 involves the fact that you cannot participate in 10 regulated activity. 11 DR SMITH: That's correct. 12 MS SCOLDING: So you cannot tell whether or not they then do 13 go on to operate in regulated activity? 14 DR SMITH: That's correct. 15 MS SCOLDING: So therefore you cannot effectively prosecute 16 anyone? 17 DR SMITH: The only way we could find out is if that person 18 applied for another enhanced disclosure with barred list 19 check, and that would come via our department and that 20 is when we would put together an evidence pack and work 21 with the police and ask the police to make a prosecution 22 there. 23 MS SCOLDING: Have you ever done that? Has that ever 24 happened, to your knowledge? 25 DR SMITH: Prosecuting people for breach of bar? Yes, we</p> <p style="text-align: center;">Page 210</p>
<p>1 have. Yes. 2 I have the figures available for you if you would 3 like those at a later stage but, yes, we do. 4 MS SCOLDING: I am now going to pass on to how somebody gets 5 onto the barred list, and I don't think we need to go 6 through it in any great detail but there is either what 7 is called an automatic bar, so people who have committed 8 the most serious offences against children, so if, for 9 example, they are convicted of rape, they are convicted 10 of indecent assault, those sorts of matters, they will 11 automatically go on to the barred list and there is no 12 right of any appeal or review or representations; that's 13 right, isn't it? 14 DR SMITH: That's correct, yes, and it doesn't depend about 15 whether or not they are working in regulated activity. 16 MS SCOLDING: Right. 17 The next way is what is called an auto bar with 18 representations. What is the difference between the 19 two, in terms of who gets to make representations and 20 who doesn't? 21 DR SMITH: The auto bar with representation offences include 22 things like murder, kidnap, cruelty, female genital 23 mutilation and supplying of controlled drugs. 24 MS SCOLDING: Okay, so they get to make representations? 25 DR SMITH: They do, yes.</p> <p style="text-align: center;">Page 211</p>	<p>1 MS SCOLDING: Okay. 2 The third way, which is probably the one which most 3 commonly occurs is where an individual has not committed 4 a criminal offence but is referred because an employer 5 has either dismissed them or removed them or because 6 they have resigned before those things can happen, from 7 working in regulated activity, following either harm or 8 risk of harm to a child? 9 DR SMITH: That's correct. 10 MS SCOLDING: Is that right? 11 DR SMITH: Yes. 12 MS SCOLDING: In that circumstance, the individual has the 13 right to make representations and also to appeal against 14 the decision? 15 DR SMITH: That's correct. 16 MS SCOLDING: Now, when do individuals have to make 17 referrals and when may they make referrals -- when do 18 organisations, rather, not individuals, have to make 19 referrals when may they make referrals? 20 DR SMITH: Organisations who are a provider of personnel 21 working in regulated active, or a regulated activity 22 provider, have a duty to refer and -- 23 MS SCOLDING: So there is a mandatory obligation? 24 DR SMITH: Yes. 25 MS SCOLDING: So if I was the chair of governing bodies of</p> <p style="text-align: center;">Page 212</p>

<p>1 a school, and I had dismissed somebody whom I had 2 suspected of sexting -- let's think of a current 3 example -- sexting a 17 year old boy with suggestive 4 pictures but everybody had decided it wouldn't be a good 5 idea to prosecute me, that person, for whatever reason, 6 I would be under a mandatory duty to refer that? 7 DR SMITH: That's right. If there is a feeling that that in 8 itself represented relevant conduct and that presented 9 a risk to children. 10 MS SCOLDING: Right, and you are largely relying on people 11 using and making those referrals, aren't you? 12 DR SMITH: Yes. 13 MS SCOLDING: Can I identify -- and in fact it is a criminal 14 offence not to make a referral? 15 DR SMITH: That's correct. 16 MS SCOLDING: Has anybody ever been prosecuted for failing 17 to make a referral? 18 DR SMITH: No. 19 MS SCOLDING: Why is that? 20 Because we know that people have failed to make 21 referrals; for example, we have got an example within 22 the Catholic investigation, within St Benedict's, 23 Ealing, where there was a failure to make referrals and 24 there are numerous other examples that we could give 25 you.</p> <p style="text-align: center;">Page 213</p>	<p>1 DR SMITH: Our sense is that we don't get as many referrals 2 into the barring service as one would expect. However, 3 we wouldn't know if somebody hadn't made a referral. 4 MS SCOLDING: Yes. 5 So, again, is that a case maybe of better 6 information sharing by organisations such as Ofsted or 7 such as -- I mean, I am assuming, do Ofsted and the ISI 8 refer matters to you where you think that a school 9 hasn't done so, to the best of your knowledge? 10 DR SMITH: To the best of my knowledge, not as far as I am 11 aware. Most of the other referrals that we get are from 12 keepers of registers or from supervisory authorities, so 13 the -- 14 MS SCOLDING: Who is that in practice? 15 DR SMITH: The GMC, NMC, in the health sector; but also from 16 the Teachers' Regulatory Agency, and that might be 17 an issue in terms of the employers may be expecting that 18 those agencies make the referrals. 19 MS SCOLDING: Okay, so there a mandatory referral process 20 and then there is a discretionary referral process? 21 Who has a discretion to refer and in what 22 circumstances? 23 DR SMITH: Anybody can make a referral to the barring 24 service if they are concerned that somebody presents 25 a risk to children.</p> <p style="text-align: center;">Page 214</p>
<p>1 MS SCOLDING: Okay. 2 Then the decision made as to when -- the referral is 3 slightly more complicated than that, because I set out 4 the easiest of examples. In order for a referral to be 5 compulsory, as I understand it, somebody has to be 6 guilty of relevant conduct and that relevant conduct has 7 to either have caused harm or be a risk of harm? 8 DR SMITH: That's right. That is the harm test. 9 MS SCOLDING: So, again, there are some significant areas of 10 discretion and judgment? 11 DR SMITH: Yes. 12 MS SCOLDING: Do people generally get it right? 13 DR SMITH: No. 14 MS SCOLDING: In what way do they get it wrong? Is it that 15 they over-refer or under-refer, or both? 16 DR SMITH: So the barring rate is about 30 per cent, so we 17 only bar 30 per cent of the cases that we actually 18 close, and we do get some referrals that, for want of 19 a better word, are inappropriate. They don't meet 20 anything like the harm test or relevant conduct or 21 regulated activity. 22 MS SCOLDING: So kind of "He looked at me a bit funny on a 23 few occasions", it would be an extreme example but the 24 sort of example where you might have referrals? 25 DR SMITH: Absolutely that, yes.</p> <p style="text-align: center;">Page 215</p>	<p>1 MS SCOLDING: So once there has been a referral, and you are 2 content that somebody has been carrying out regulated 3 activity, because, for example, if I was a lorry driver 4 and I was engaging in nefarious activities with 5 underaged girls, I wouldn't be carrying out regulated 6 activity, would I? So irrespective of how much harm 7 I cause to children, I would not go on a barred list? 8 DR SMITH: No. 9 MS SCOLDING: So that is the limits of the barred list; it 10 is only really relevant if you get caught engaging in 11 risky or harmful activity when you are doing something 12 to do with a school, or a health organisation, or a care 13 organisation, broadly? 14 DR SMITH: Or that you have engaged in regulated activity, 15 you are or you are likely to be. So if you were a lorry 16 driver who also has a teaching qualification, that might 17 put you on the barred list. 18 MS SCOLDING: Okay. All right. 19 You then have something called a Structured Judgment 20 Process. Could you explain, very briefly, roughly what 21 that means, and when people are likely to be then put on 22 the list? 23 DR SMITH: So the Structured Judgment Process is a tool that 24 is used at stage 3 of the barring decision-making 25 process and it is not always used but it is an available</p> <p style="text-align: center;">Page 216</p>

1 tool to help people do their evidence, for the
 2 caseworkers to do their evidence evaluation, and to
 3 weigh the evidence that is in the information that is
 4 presented to them. It is as simple as that, really.
 5 MS SCOLDING: Chair, I note the time. I have literally got
 6 about five minutes more worth of evidence. Would it be
 7 acceptable to carry to just to finish this witness?
 8 Thank you very much.
 9 The problem is that -- well, a problem that some
 10 individuals have identified to us, is the application
 11 goes in, you accept it, the individual then has a right
 12 to make representations, and these are in the auto bar
 13 with representations or the discretionary/mandatory
 14 representations, but there is no means by which the
 15 referring party can either comment on or provide further
 16 representations after that stage.
 17 So they cannot reply and say, "Actually, what Joe
 18 Bloggs, the lorry driver who also has a teaching
 19 qualification, has told you is a pack of lies?"
 20 DR SMITH: So, you are correct, we don't go back to
 21 employers to say, "This is what the referred individual
 22 has said, do you want to reply to that?" We don't do
 23 that.
 24 However, there is plenty of opportunity for us, if
 25 we are reading the representations, to query, to go back

Page 217

1 are on a barred list, we would have to give them that
 2 information.
 3 MS SCOLDING: And, again, you don't tell the referring
 4 agency if somebody has gone onto the barred list or if
 5 they haven't?
 6 DR SMITH: No. That is right.
 7 MS SCOLDING: So at the moment they have no right of appeal
 8 or review. Do you think that is something which they
 9 should have?
 10 I am just thinking in the light of Ms McCall's
 11 evidence, if they would have, they would have probably
 12 appealed or sought a review of your decision but of
 13 course, if you don't know what the decision is, then you
 14 cannot put a case together, can you?
 15 DR SMITH: They can claim legitimate interest under the
 16 legislation, and that is one way of being informed about
 17 what the barring decision is. They could make another
 18 referral. Or the other person who might be able to
 19 claim legitimate interest with regard to children is the
 20 LADO, and they might be able to find that information.
 21 Now, that doesn't help the person --
 22 MS SCOLDING: No. So the school would have to contact the
 23 LADO? So Ms McCall would have had to have contacted the
 24 LADO and said to the LADO, "Look, you have got
 25 a legitimate interest, you need to find out what is

Page 219

1 to the employer and ask for more information so that we
 2 can be clear on the evidence.
 3 MS SCOLDING: But I suppose, again, you don't know what you
 4 don't know.
 5 DR SMITH: That's right.
 6 MS SCOLDING: In that, if something is sort of wholly
 7 substandard, you might not even have the information to
 8 know which questions to ask?
 9 DR SMITH: That's right, yes.
 10 MS SCOLDING: So do you think it would be useful to have
 11 a right of reply by the referring body? Because, at the
 12 moment, once the referral is made, the referring body
 13 completely drops out of the picture, as I understand it.
 14 DR SMITH: That's right.
 15 MS SCOLDING: Do you think it would be useful?
 16 DR SMITH: I think it would be difficult, because it would
 17 be how that plays out in terms of confidentiality, in
 18 terms of where it stops -- so, for example, if we place
 19 somebody on a barred list, and the circumstances change
 20 or there is some new information that the person didn't
 21 have in their representations and they want us to send
 22 us that later on, and we remove that person from the
 23 barred list, or the person is successful in appeal from
 24 being removed from the barred list, then we would have
 25 to go and tell everybody else who we have told that they

Page 218

1 going on here and then tell us"?
 2 DR SMITH: That would be up for the LADO to decide if that
 3 is in the child's best interests, or children's best
 4 interest, and also weigh it up with the confidentiality
 5 requirements.
 6 MS SCOLDING: Also, the DBS can also review someone's
 7 inclusion on a barred list at any time?
 8 DR SMITH: Yes.
 9 MS SCOLDING: But, again, there is not necessarily a right
 10 of review if somebody has not gone on the barred list,
 11 other than by a fresh referral?
 12 DR SMITH: That's right, yes.
 13 MS SCOLDING: Okay, so, again, possibly in the context of
 14 what we were talking about with Ms McCall earlier, that
 15 is potentially problematic because, once a negative
 16 decision has been made, it is then very difficult, if
 17 the same circumstances are, you know, somebody might
 18 make a different decision two or three years later, do
 19 you not think?
 20 DR SMITH: Sometimes you can say that, as in most things in
 21 safeguarding, that understanding changes about various
 22 aspects, that actually a different decision might be
 23 arrived at several years later.
 24 MS SCOLDING: Yes, and shouldn't there be a right to sort of
 25 review your homework, so to speak? So to sort think

Page 220

1 about whether or not the decision is the right decision,
 2 either one way or another, on a regular basis?
 3 DR SMITH: At the DBS, we have a quality assurance process
 4 that does that constantly. We constantly take
 5 a 10 per cent sample of all closed cases and assess
 6 whether or not the right decision has been made, and
 7 there are other occasions where, if a new referral comes
 8 in and we look at the old referral, we might then be
 9 able to say, actually, the wrong decision was made in
 10 that case.
 11 So we do have a process by which we can review
 12 decisions. We can reactivate cases in the light of new
 13 information and as part of our quality assurance
 14 process.
 15 MS SCOLDING: Okay, thank you.
 16 I have no further questions for you, Dr Smith.
 17 Thank you very much.
 18 Chair and panel, do you have any questions?
 19 Questions from THE PANEL
 20 THE CHAIR: Ms Sharpling?
 21 MS SHARPLING: Forgive me, Dr Smith, if you have already
 22 said this, but what is the volume of referrals you get
 23 on a yearly basis?
 24 DR SMITH: Altogether, including the auto bar referrals, it
 25 is about 50,000.

Page 221

1 MS SHARPLING: 50,000?
 2 DR SMITH: Yes.
 3 MS SHARPLING: Thank you.
 4 THE CHAIR: We have no further questions.
 5 Thank you very much.
 6 MS SCOLDING: Thank you both very much.
 7 Chair and panel, we have no further evidence for
 8 today. May we adjourn until 10.00 am tomorrow morning?
 9 THE CHAIR: Thank you.
 10 (4.22 pm)
 11 (The inquiry adjourned until 10.00 am the following day)
 12
 13
 14 I N D E X
 15
 16 MS AMANDA SPIELMAN (sworn)2
 17
 18 MS HELEN HUMPHREYS (sworn)2
 19
 20 Examination by MS SCOLDING2
 21
 22 Questions from THE PANEL131
 23
 24 MS JOLANTA MCCALL (sworn)140
 25
 Examination by MS BICARREGUI140
 MS SUSAN YOUNG (sworn)184
 DR SUZANNE SMITH (sworn)184
 Examination by MS SCOLDING184
 Questions from THE PANEL221

Page 222

A	101:13 105:24	achieved 77:5	210:13 211:15	88:4
A(i) 3:20	138:15 146:20	Acknowledging	212:7,21 215:21	adulthood 146:3
A/1 1:18 3:2 141:1	159:1,8,9,10	171:12,13	216:3,6,11,14	adults 18:14 88:12
185:20 186:16	162:20 164:18	act 6:6 17:25 32:15	actual 23:19 63:17	89:1 124:22 190:6
A/2 3:2	173:9,9,10	32:16 54:6 59:19	64:2 91:23 117:1	193:20 194:1
A/5 1:9	abused 52:10	71:25 85:10 86:4	152:5	advance 187:10
abilities 30:5	174:21	87:1,3 107:15	adapt 99:6 108:4	advances 143:4
ability 18:14 23:4	academic 78:3	135:23 165:19	169:14	advent 13:13
79:17 127:3	academy 4:23	175:9 178:3 179:6	adaptation 169:18	advert 151:19
129:23 159:6	121:13	179:14,23 187:24	adapted 167:23	advertise 151:16,18
161:25	accept 42:5 49:20	189:25 194:17	add 8:23 14:3 27:3	advice 21:11 26:21
able 19:16 29:7,11	60:17 217:11	197:21 199:15	39:19 74:25 97:9	26:21 52:17 57:22
40:23 50:4 120:19	acceptable 77:21	200:14,24 201:22	175:16 178:6	57:23 70:7 118:24
121:2 132:23	115:5 160:6	201:25 202:2,11	add-on 88:25	194:9
137:12 140:15	171:10,21 183:2,4	202:13,20 203:3	added 26:7 179:5	advised 92:14
142:6 146:19	217:7	acted 50:14 91:16	addition 65:24	advocacy 123:9
157:20 160:10	accepting 171:13	action 56:11 61:12	additional 15:6	124:16
161:2,3 163:4	accepts 177:21,22	63:21,25 67:9	19:9 36:19 74:16	advocate 122:2
180:13 185:15	access 42:12 120:15	82:16 100:24	143:18 149:15	advocates 123:25
191:12 209:25	120:24 121:6	105:15,16 106:17	206:9	124:18,20
210:2,3 219:18,20	122:21 136:7	111:16,25,25	address 2:20 9:1	AEGIS 116:13
221:9	164:7 209:20	112:11 113:4,13	addressed 57:1	118:24 119:12
able-bodied 145:1	accommodate	113:15 114:9	79:22	affairs 129:23
abroad 119:23	18:12 138:4	142:13 157:13	addresses 150:3	afternoon 140:17
absence 202:17	accommodated	actions 52:6 71:14	addressing 122:25	183:25 184:18
absolute 127:25	136:21	156:24 164:21	adduce 172:16	age 52:22,24,25
128:15 201:23	accommodates	166:11,21 171:9	Adele 207:17	136:20 168:4
absolutely 8:2,14	19:14	177:19,19	adequate 91:12	203:15
12:22 17:14 18:25	accommodating	active 25:1 61:14	92:18 101:24	agencies 31:20,25
37:19,23 41:2	19:21	212:21	102:3 133:2	70:11 77:6 214:18
42:12,21 43:14	accommodation	activities 34:14	adequately 136:9	agency 66:20
44:17 49:18 50:12	23:18 51:11 58:8	156:14 157:11	adjourn 222:8	193:13 214:16
51:22 55:2 60:7	accompanied 30:14	161:13 193:9	adjourned 222:11	219:4
60:14,16 62:9	account 49:6 56:20	195:21 197:24	Adjournment	agenda 164:3
65:5 71:9 72:6	97:14	199:4 216:4	115:14	aggressive 52:16
73:1 95:18 96:6	accountable 131:8	activity 111:12	adjusting 138:3	Agnew 130:4
98:14 101:12	accountants 188:21	168:25 191:23,24	adjustments	ago 120:3 130:21
104:20 120:4,19	accoutrements	193:20,22 194:15	185:10	132:10 183:3
122:18 124:16	19:8	194:16,20 196:12	admission 36:11,13	agree 23:9 39:16
133:17 135:7	accredit 43:15	197:18,21 198:2	74:15	60:22 65:5 126:14
140:11 215:25	accumulation	199:15 200:1,15	admitted 85:14	agreed 28:2 176:5
absorb 89:10	100:25	202:5 203:18	137:5,9,9	agreeing 2:5
absurd 98:5	accurate 28:6 52:9	205:7 206:8,21	admittedly 63:11	137:13
abuse 32:6 91:13	accused 58:11	207:21 208:2	adult 53:21,22 87:1	agreement 8:6
91:15 93:12	achieve 127:15	209:13,23 210:10	87:8,18,19,25	175:18

<p>aim 168:22 aims 146:3 air 139:7 aired 120:23 albeit 180:25 alert 154:3 alerts 154:1,24 aligned 46:13 alive 77:13 allegation 54:2 174:16 177:22 allegations 55:1 101:13 105:19 173:8 174:23 178:15 181:1,5 alleged 52:13 64:12 202:24 alleging 64:21,23 allocate 158:2 allocated 152:22 allow 69:9,11 94:16 allowance 119:24 119:25 allowed 49:16 50:16 64:5,8 94:14 110:5 121:10 allowing 164:6 allows 163:7 alongside 26:4 alterations 185:10 altered 2:18 Altogether 221:24 Amanda 1:7 2:1 105:7 118:18 222:15 amend 22:1 amended 6:10 amount 5:6 86:10 129:18 131:9 196:19 206:17 207:25 analogy 127:19 analysed 162:15 166:15</p>	<p>analysing 161:18 162:17 163:17 analysis 153:20 162:24 and/or 16:22 angle 201:10 Anglican 196:3 annex 15:25 annual 129:13 annually 48:10,11 anomaly 116:11 118:18 answer 26:3 129:3 135:12 138:6 185:15 answered 15:17 answering 115:22 anxieties 148:10 161:23 anybody 59:17 71:5 73:6 93:25 99:18 189:9 198:20 202:4 213:16 214:23 anymore 139:14,14 anyway 75:2 Apologies 185:24 apologise 3:18 112:18 187:10 apparent 52:7 143:23 appeal 104:21 182:5 211:12 212:13 218:23 219:7 appealed 219:12 appear 33:20 70:10 140:14 appearance 112:23 appeared 70:11 93:13 94:24 98:8 appears 33:24 111:23 181:23 application 5:21 191:5 217:10</p>	<p>applications 109:14 110:9 applied 189:11 210:18 applies 9:8,9 191:1 193:8 apply 8:11,11 37:11 137:23 189:8,9,9,14,17 190:24,24 191:3,7 192:4,7,23 193:1 204:4 208:9 appoint 78:21 125:16 appointed 19:22 42:8,15 approach 14:10 22:21 54:19 61:14 61:14 84:1,1,18 110:11 113:24 122:16 204:1 approached 56:6 56:10 appropriate 43:7 54:3 63:19,24 66:25 67:16,20 104:5 105:4 175:6 204:18 appropriately 39:22 75:18 approve 137:25 approximately 151:21 187:5 April 74:4 75:17,24 76:11 architecture 138:21 area 27:4 64:8,13 69:10 87:7 116:15 137:11 163:16 187:12 areas 12:13 32:2 48:19 57:15,16 58:7 67:23 107:13 107:22 116:7</p>	<p>142:4 145:8 199:14 208:5 215:9 arguably 95:24 argument 10:4 arisen 115:19 arises 125:2 arising 71:21 arose 45:25 172:7 arrangement 92:11 117:3,16 118:7,8 118:14 119:10 130:1 arrangements 16:19 24:21 41:12 67:20 75:19 87:12 116:25 118:10,15 164:8 173:2 arrive 37:17 164:1 170:9 arrived 56:3 220:23 artificial 92:13,15 asked 20:24,25 21:7 61:2,10 74:11 112:24 118:10 173:5,6 181:7 182:13 205:24 207:4 asking 64:20 80:4 128:25 129:9 140:6 173:13 192:14 aspect 20:13 97:16 97:20 aspects 9:8 10:16 24:12 79:18 138:3 195:10 220:22 aspirational 8:2 assault 52:15,16 211:10 assaulted 52:10 assembled 47:18 assemblies 196:5 assertive 59:14</p>	<p>assess 50:6 83:2,2 221:5 assessed 156:6,10 assessments 67:5 71:2 asset 163:24 assist 102:3 157:25 assistance 11:6 26:10,10 206:5 assistant 45:3 170:11,16 183:7 assisted 173:21 associate 169:23 Association 20:3 31:6,7 73:21 assume 45:1 96:23 107:15 assumed 106:7 assuming 45:2 96:23 200:19 214:7 assurance 41:11 67:14,20 69:18 70:6 72:6,9 77:11 81:11 82:20,22 83:4,14 117:10 123:15 127:17 128:10,14,14 130:9,12,16 131:14 133:3,21 192:21 221:3,13 assure 29:18 127:3 asymmetry 131:3 137:14 Atkinson 180:17 181:9 atmosphere 166:7 attach 53:9 attachments 1:15 attempt 128:17 attend 16:25 25:10 83:11 attended 36:2 attending 8:17 16:25</p>
--	--	--	--	--

attention 11:5 159:19 161:9	B	49:2,10 60:24 66:14 67:2 133:22	belief 3:5,14 4:1 141:7 186:5,22	119:22 145:5 150:18 154:14
attractive 208:14	back 81:22 199:21	based 23:14 97:14	believe 27:18	160:8 179:19,21
August 176:22	21:9 25:5 46:4	109:7 145:25	110:23 123:5	199:21,21,21
authoritative 22:21	48:2 50:7 57:1	155:17 182:21	135:18 139:10	215:22
authorities 86:23	59:3 61:23 71:19	bases 49:11 143:12	beneath 36:1	bizarre 111:3,4
87:3 93:11 117:22	84:10,12 87:18	basic 71:11 74:8	Benedict's 213:22	black 179:19
117:24 118:11,15	90:5 96:14 98:25	152:8 189:8,14	benefit 78:9 90:9	blanked 121:18
145:13,18 155:16	99:6 103:21 118:6	191:18 193:1	126:9 130:2	blemishes 191:15
175:6 214:12	128:25 135:19	basically 11:11	best 3:4,13,25	blind 146:24 147:3
authority 35:5	136:4 141:2	29:24 43:24 48:18	29:19 84:7 97:19	blocked 122:22
46:24 72:12 85:20	147:24 152:6	60:23 61:22 81:6	112:5 122:10	Bloggs 217:18
86:1,4,17,24,25	165:3 201:7,23	82:12 101:6	141:6 185:15	board 131:12 151:5
87:11 99:3 118:23	202:8 203:5	190:10,24	186:4,21 201:1	151:20,24 152:4,5
149:15 153:7	217:20,25	basics 154:6 168:3	214:9,10 220:3,3	152:7,11,13,18,25
155:12,13,13,16	background 80:2	basis 92:25 102:19	better 2:22 7:4	153:2,3,6,12,19
155:18 173:5,6	132:24	111:11 125:14	11:24 13:17 29:17	154:20,23 155:3
authors 201:17	baked 50:8,10	126:6 154:19	47:20,22 138:15	boarders 23:25
autism 18:16 29:10	balance 79:13	157:9 200:19	139:18 150:4,6	24:1 60:3
35:25 74:8 144:10	128:11 132:9	202:24 203:14	154:11 165:21	boarding 6:22 7:2
autistic 18:17 29:12	138:21 207:5,8,9	221:2,23	173:2 204:4 214:5	19:6,22 23:18
36:15 74:6 147:19	balancing 14:6	bathing 194:23	215:19	31:7 32:24 33:4,4
149:1,22	banter 60:15	beans 50:8,11	beyond 77:24 116:6	33:21 34:13,13,14
auto 211:17,21	bar 210:4,25 211:7	beast 78:16	121:15	34:15,22 35:17
217:12 221:24	211:17,21 215:17	beautifully-crafted	Bicarregui 139:21	39:8 42:4,7 44:1
automatic 211:7	217:12 221:24	15:10,15	139:23 140:4,5	45:20 46:9 47:7,9
automatically	barking 198:21	bedevils 117:11	171:23 172:5	47:21,24 48:12
97:23 211:11	barometer 160:23	began 142:20	183:15,21 222:20	50:22 60:2 61:4
available 169:17	161:5,6,10,17	beginning 56:7,10	Richard 202:15	65:1 84:14 85:23
172:24 177:17	162:3,14	142:15	big 117:23 148:24	116:21 117:25
183:12 211:2	barred 44:6 110:25	begs 201:8	170:12 201:16	120:2,10 121:25
216:25	193:18 194:6	behalf 129:1,9	bigger 45:15	124:6 136:19
averagely 14:8	198:3,5,17,18,25	192:5,7 208:24	biggest 162:2	bodies 77:25 79:21
avoid 119:14	199:7,19 209:8	behave 177:23	163:24	80:6 88:4 152:21
aware 26:15 53:8	210:4,18 211:5,11	200:20	birth 87:2	191:2 212:25
55:7 92:8 116:5	216:7,9,17 218:19	behaviour 96:8	bishop 196:2,4	body 71:14 72:11
121:10 167:6	218:23,24 219:1,4	144:11 150:1	bit 1:21 9:3 19:2	80:15 109:4
175:7 176:21	220:7,10	161:18 162:21	20:23 32:10 40:4	125:16 167:25
214:11	barring 142:13	163:3,15 167:5	40:5,25 43:12,16	168:1 169:1
awareness 74:9	186:12,25 187:21	173:18 177:11,15	51:2,8 54:14,18	171:17 191:2,4
159:11 160:5	187:22 188:2	183:4	60:15 72:18 78:20	218:11,12
168:1 169:1	197:8 201:6	behavioural 93:8	79:3,9 90:22	boots 65:7
awful 18:16 60:19	206:17 207:17	162:20	94:25 103:14	bottle 161:13
69:15 86:10	214:2,23 215:16	behaviours 162:18	111:20 114:8	bottom 1:14 22:2
	216:24 219:17	171:3	116:10 117:6	65:23 176:14
	base 29:8 48:25,25			

178:21	65:17 87:24 89:17	capable 120:19	93:25 101:21	certain 73:2,2 95:4
bought 161:12	202:3	capacity 137:18	133:15 135:15	140:20 142:14
bound 176:21	budget 127:7,13	144:23 145:7,16	143:14 146:9	162:25 170:21
boundaries 96:6	128:2	204:8	156:19,20 179:22	188:10 190:14
box 29:4 44:4,4,5	building 144:24	capping 145:3	180:8 191:6 197:5	certainly 33:24
boxes 105:20	buildings 144:25	captured 162:13,14	214:5 219:14	34:4 40:1 49:25
boy 213:3	160:22 165:2	card 164:14 165:3	221:10	70:1,23 79:2
boys 75:21 196:8	built 35:4 90:1	165:3	cases 16:15 66:24	98:20 116:5 135:8
bracelet 53:7	104:15 144:25	cards 164:10	67:18 110:12	137:4 204:12
branches 181:22	bullying 35:24	care 4:15 8:5,25 9:4	112:4 121:1	205:16 208:17
breach 210:4,7,25	51:10 57:4 58:7	9:16 12:10,25	135:11 136:15	certificate 16:2
breadth 110:14	58:12 60:8,11,15	15:22 17:24 18:15	139:2 215:17	43:8 188:11,13,15
157:23	60:20	25:15,16,18,19,20	221:5,12	188:20,22 189:2,8
break 2:12,13 35:7	bumping 10:1	26:5 27:11 28:2,8	caseworkers 217:2	189:14,21 190:25
35:11,13 114:25	bundle 1:8,11,18	28:15 29:12 41:4	cast 99:20	191:13,18 192:9
115:4,5 140:16,17	3:1,20 27:20	67:5 70:15 81:23	catalogue 62:16	192:12 193:1,4,7
171:25 172:3	140:12 141:1,10	82:3,23,24 84:2	63:1	193:15,18 196:23
184:24	185:20 186:17	87:1,19,24 88:4,5	categories 37:6	197:1 199:8
breaks 108:9	bundles 2:25 185:4	88:15 89:7 90:17	categorisation	certificates 188:24
breathe 108:12	burden 75:1	103:11 116:14	32:21	190:16,23 191:3,7
briefing 56:16	business 184:8	117:7,20 124:17	category 33:17	certification 189:7
briefings 56:15	197:25	124:21 127:4,11	Catholic 213:22	cetera 53:9,9 84:18
briefly 43:10 52:2	C	131:19,20,22	caught 47:8 216:10	84:19 178:19
129:1 153:1 155:1	cabinets 105:20	132:2,6,8,11,20	cause 110:13 154:2	chain 84:25
169:6 180:25	106:20	132:24 134:9	154:4 166:14	chains 4:22
216:20	cake 127:20	136:11 143:6,11	216:7	chair 1:3,5,8,12
bright 208:12	calibration 101:18	144:5 178:18	caused 174:19	20:19 27:19 35:9
bring 9:2 10:6 48:5	call 24:9 30:9 35:16	179:1 183:5	215:7	51:17,18 76:3
68:18 77:3 104:6	46:13 121:19,25	187:18 194:22	causes 153:14	114:24 115:5,6,7
112:2	122:3 139:23	195:10,11 206:16	184:10	115:16 121:16
bringing 47:13	169:20 188:1	216:12	cautioning 190:21	131:16,18,25
202:9	205:4	carefully 11:14	cautions 188:9	132:4,9,25 133:5
brings 9:12,17	called 5:8 11:6	51:8 175:4	190:18	133:7,14,18,23,25
89:20	15:25 78:15 123:5	caring 194:8 195:1	cautious 200:20	134:12 135:4,10
British 116:22	165:8 211:7,17	197:14	CCG 27:12	135:17,21 136:2,9
148:6 169:11	216:19	carried 30:24 36:21	cease 174:18	136:13 137:7,23
broad 10:22 163:16	calling 140:13	77:12 78:6 178:24	178:17	138:2,9 139:20
broader 115:18	calm 22:21	carry 65:11 90:5	cellars 105:21	141:9 146:5,18
broadly 4:14 74:23	campaign 53:6	110:25 135:10	cent 143:18 215:16	147:2 150:12
108:11 110:10	64:22	173:7 179:22	215:17 221:5	153:4 163:22
134:4 142:4	cancellation 103:18	217:7	central 41:19,21	165:7 168:11
216:13	104:3	carrying 216:2,5	42:1,14,22,23	171:24 172:1,5,12
broke 70:12	candour 106:25	case 5:6 10:16	43:4,12	172:15 173:14
broken 145:14	107:8 108:10	23:21 32:1 47:6	centre 161:8	183:17,18,21,23
brought 8:25 11:4		54:10 56:3,17	CEO 145:2	184:14 185:21

212:25 217:5 221:18,20 222:4,7 222:9 chairing 152:24 challenge 72:1 75:3 120:22 challenges 128:19 134:19 challenging 7:22 144:11 149:25 163:3 chance 141:25 157:9 182:22 185:25 chanced 46:1 change 36:11,11,18 37:9,11,12,13 51:14,19,20 56:11 80:13 86:10 89:6 89:17 106:2 120:7 129:23 132:22 136:20,22,24 137:16,18,21,24 138:12,14 206:7 218:19 changed 36:5 49:2 69:18 70:23 74:16 101:11,12 112:10 120:14 133:23 136:21 142:7,24 142:25 143:2,5,13 143:16 162:21 198:13 204:10 changes 50:3 80:14 128:19 136:10 137:21 162:21 177:23 197:20 200:23 203:2 204:15 220:21 changing 136:5 143:25 163:5 channels 122:8,9 characterised 101:5 charge 75:21	139:11,13 charismatic 108:20 charity 76:13,14 151:1,4,4 check 1:16 14:20 16:5 28:12 44:6,7 44:12 45:10 75:23 106:20 126:11 133:22 157:10 180:3 193:18 194:6 198:3,5 199:20 207:22 210:19 checked 133:15 checking 41:25 201:19 checklist 14:24 15:18 checks 44:9,10 45:7 71:11 111:8 196:13 197:22 198:4 202:17 204:7 Chelfham 5:16 68:5 85:3,21 93:6 Chetham's 41:20 41:22 43:10 44:21 46:23 68:4 chief 4:4,7 111:19 139:24 141:11 156:12 184:4 child 8:5,15 9:15 11:2 36:22 51:25 53:1 58:11 59:2 62:12 66:24 68:24 71:6 91:14 106:14 113:25 118:22 119:16,19 121:18 124:21 125:12,14 135:16 145:25 147:8,11,12,14 148:1,3 149:22,23 149:24 150:3,9 158:15,18 161:4 161:15,15,24	162:4,18,25 163:18 167:22 168:8 171:19 173:10 174:18,21 187:7 204:19 212:8 child's 72:7 161:20 162:21 163:5 174:22 220:3 Childline 121:17 children 6:6 8:19 10:11,17,19,22 13:6,10,13,19,20 14:1 16:22,24,24 17:1,1,5,12 18:5,6 18:8,12,13,16,19 19:14,21 22:9 23:4,16 24:7 25:8 25:19 27:6,10 28:8,15 29:7,9,12 32:16 34:4,5,8,15 35:24 36:2,3,6,14 36:15,16 37:17 39:21,21 42:12 50:19,22 51:1 59:19 60:20 64:8 65:1 68:16,16 69:8,9,11 71:3 74:7,16 79:9 85:14 86:4 87:3 88:10,24,24 90:2 90:11 92:22,24 93:2,3,8,10,11,13 93:17 94:1,10,23 96:19 97:3 98:6,7 102:1,6,8,9,9,11 104:4 105:8,10 116:8,16,21,22,24 117:4 119:7,13,22 120:9,11,18,21 121:2,5,8,10,15 122:7,9,10,19,22 123:13 124:2,9,13 124:17,20,25 125:5,6,10 126:17	127:5 130:6 136:21 137:9,22 138:15,25 143:5,8 143:16,18,21,24 144:3,6,9,14,17 144:18,22,25 145:1,12,16,20 146:4,7,11,17,19 146:24 147:3,19 147:19,20 148:9 148:12,13,16,18 148:19,20,24 149:2,2,7,12,18 149:20 150:5,8,17 155:23 157:9,19 157:21 158:6,12 158:24 159:23,24 160:3,5 161:7,22 161:23 162:6,19 163:4 164:25 167:1,4,6,7,24 168:19 169:9,22 169:23 170:8,10 170:11 171:1,4,16 171:18,21 174:8 175:3,8,9,19 176:4,18 177:2 178:3,16,17,24 179:1,6,14,23 181:3 183:5 188:23 190:6 193:20,25 194:2,9 194:11 195:5 196:16,21 197:3 197:25 200:22 201:24 202:7 203:24 204:20 207:6 209:25 211:8 213:9 214:25 216:7 219:19 children's 4:8,15 4:17 8:12,16 9:9 14:9 16:6,9,13,17 16:23 17:4,5,17	17:24 18:4 19:3 19:13,13,19 24:16 26:25 27:11 28:7 36:20 38:3 41:6 53:18,18,22 54:5 54:5 58:21 61:19 76:15,17 85:5,15 85:22 86:3,8 87:4 87:5,7,8,25 88:5 88:18 91:2,6,9,10 91:20 92:18 94:18 94:19,23 95:3,15 95:25 96:16,16,24 97:4,8 99:22 100:16 101:9 104:2,7 106:12 113:24 114:18 116:11 117:19 120:15 123:7,25 124:7 125:11,13 125:22 131:24 132:15 141:17 148:25 149:16 155:22 156:4,10 158:9 220:3 chimes 73:20 choice 39:14 49:23 114:23 157:11 158:9 choices 146:1 147:25 choose 15:6 148:1 chooses 122:3 choosing 171:16 chosen 62:8 Christine 18:21 20:14,24,25 21:7 24:7 161:4 167:1 Christine's 27:16 chummy 40:25 chunk 127:13 ciphers 140:20 circumstance 212:12 circumstances 54:2
--	--	--	--	---

61:17 64:4 65:13 69:23 72:1 95:4 101:19 188:10 200:17 203:15 214:22 218:19 220:17 claim 219:15,19 clarify 20:1 141:21 208:2,7 clarifying 208:18 clarity 47:5 182:1 class 192:22 classrooms 111:3 clean 134:15 cleaning 194:14 195:9 clear 13:2,16 22:4 23:1 42:3 54:15 54:17 55:17 56:3 61:25 66:16 81:12 93:15 94:5 96:7 109:17 113:23 118:13,18 123:11 124:11 125:22 128:12 130:3 177:14 179:10 180:23 189:22 197:2 201:10 218:2 clear-cut 177:12 clearer 46:11 208:11 209:3 clearly 80:14,17 113:20 122:4 178:24 196:22 203:6 205:25 Climbie 118:6 119:1 clinical 26:10,14 close 16:22 27:13 40:8 62:4 112:5 116:23 120:19 155:17 215:18 closed 10:8 61:22 76:5 85:5,5 103:4	105:15 173:21 221:5 closely 155:6 closer 143:11 closing 10:15 closure 20:9 club 79:4 coast 117:25 code 15:19 coherent 83:25 cohort 125:7 143:5 143:16,20 144:1 144:14 148:15,21 150:5 167:10 177:6,6 coincide 47:24 Coley 43:22 collaborative 130:5 colleague 20:8 40:9 college 141:18 151:8,14 195:4 colleges 194:13 combination 72:10 combined 65:24 come 8:7 19:8 24:23 26:23 28:13 28:19 29:1 43:9,9 55:18 56:2 59:5 69:13 72:25 80:6 84:13 90:12 93:9 94:1 98:25 100:1 100:22 118:4 119:7 121:23 122:8 123:21,25 125:17 126:5 128:25 135:19 136:17 138:6 153:21 154:14 170:10 185:7 191:12 196:23 199:18 209:10 210:19 comes 22:7 60:9 71:11 82:21 123:16 156:1	203:24 221:7 comfortable 165:20 coming 2:5 61:23 107:25 120:11 145:12 153:11 156:5 184:19 comment 12:21 22:8 94:7 98:5 185:17 217:15 commentaries 89:24 commentary 11:7 11:11 comments 5:23 66:13,15 109:7 143:3 commercial 136:6 169:17 commercially 169:14 commission 57:2 59:5,20,22 76:13 76:14 87:24 135:13 commissioned 21:10 57:9,14 129:15,17 156:21 156:23 172:25 Commissioner 76:16,17 149:1 Commissioners 134:9 committed 211:7 212:3 committee 112:21 112:23,25 committees 152:4 common 8:25 9:2 12:25 15:22 23:7 45:24 91:25 103:11 169:15 201:7,8 202:24,25 commonly 96:4 212:3 communal 173:20	communicate 29:7 120:19 146:17,19 147:8,20 148:14 157:20 158:16,19 159:6 161:4 communicating 63:8 99:10,11 158:21 161:7 communication 18:14 37:16 120:16,22,24 122:20 124:14 144:19 146:25 147:5,7,18 148:23 149:2,4 150:1 157:19 158:3,17 158:25 160:25 167:22 communications 144:8 146:2 157:24 communicator 170:19 communities 124:15 community 16:22 119:9 company 151:3 192:17 compared 88:11 126:20 compatible 102:11 competence 107:19 competent 14:8 19:18 complain 50:20 complaint 51:23 53:12,13 54:12 58:14 61:8,21 62:2,3,4,7,12 84:12 90:15 100:24 complaints 49:22 50:24 61:25 63:9 66:12 68:18 81:7	82:13 83:1 100:19 100:22,25 complete 108:15 157:13 completely 12:20 60:23 64:9 66:3 69:10 82:13 87:13 122:13 125:23 149:24 198:21 218:13 completion 175:5 complex 8:16 18:13 19:14 23:5 27:6 30:3 36:14,16 143:19,24 144:6 149:7,20 150:8 157:24 complexities 17:9 18:20 71:3 complexity 18:4 23:15 25:24 30:2 39:22 125:4 126:20 143:20 144:12 145:5 146:22 150:10 208:13 compliance 14:17 14:25 103:6,13,16 103:17,19,20 104:6 151:3 compliances 103:7 complicated 187:12 190:4 197:7 207:20 215:3 complimentary 38:21 comply 11:1 94:19 103:16 complying 38:5 components 152:15 composition 37:10 79:20 80:13,15 comprehend 171:22 comprehensive
---	---	---	---	---

<p>7:14 157:12 compulsion 98:17 compulsory 73:5 126:2 215:5 computer 162:14 concealed 99:8 concealment 94:4 concentrate 42:7 concentrated 203:13 concept 9:11 concern 22:11 49:25 53:22 55:10 110:13 116:11 154:3,4 166:14 184:10 201:18 concerned 10:20 52:5 60:12 96:18 117:22 128:17 187:24 203:20 214:24 concerning 55:13 186:12 203:24 concerns 13:22 14:14 31:18 51:5 51:10 53:21 63:6 70:1 78:7 84:11 99:11,22 102:24 106:14 111:15,22 113:9,12 116:8 133:11 139:1 153:15 154:9 158:24 164:7,11 165:14 166:3 172:8,22 173:10 173:18 202:16 conclusion 66:6 176:1,1,3,5 179:4 concrete 154:15 158:23 168:10 171:6 concur 182:12 condition 210:8 conditions 137:8,9 conduct 66:21</p>	<p>177:7 197:17 213:8 215:6,6,20 conducted 174:10 confidence 104:14 104:18 114:20 166:9 confident 21:6 23:7 29:18 66:1 105:3 confidentiality 218:17 220:4 confirm 3:3,10,22 141:6 186:1 confusion 28:23 29:1 31:16 34:1 34:19 congruent 119:11 connection 161:19 184:6 consecutive 41:6 consensual 198:11 consent 52:22 160:6,19 168:2 consequences 22:9 Consequently 159:10 consider 7:25 12:23 94:10 139:12 152:19 175:4 180:25 205:15,25 206:1,11 considerable 111:23 116:8 considerably 37:1 consideration 175:8 179:24 180:14 considered 70:2 163:19 175:2,7 178:2,5 180:8 considering 102:12 181:8 consistency 11:13 114:2 consistent 123:9 consistently 84:15</p>	<p>consists 153:4 Constabulary 184:3 constant 205:4,12 constantly 14:6 52:12 160:2 221:4 221:4 constrained 139:8 constraints 79:20 constructed 192:25 consultants 173:1,4 contact 38:1 40:12 55:7 70:5 93:5 179:1 195:5 202:7 219:22 contacted 53:4 176:15 219:23 contacting 54:23 contagious 101:6 101:22 contain 13:25 contained 28:18 contemplate 99:7 139:7 contemplated 110:15 content 11:22 179:22 216:2 context 22:6 25:24 57:8 64:25 71:21 72:5 76:22,25 79:7,19,23 94:22 96:2 100:4 120:11 123:14 124:19 151:11 159:24 169:5,8,10 170:24 178:6 193:22 201:24 220:13 contexts 9:9,10 72:16 90:3 contextual 22:9 continue 113:9,12 continued 174:16 174:20 continuous 45:9</p>	<p>contrast 113:23 contribute 2:22,23 207:12 control 86:24 97:24 109:18 controlled 211:23 controllers 79:14 controlling 93:20 110:2 controls 79:23,25 conversation 78:4 89:21 116:17 134:25 180:22 conversations 77:24 78:1 90:7 90:16 129:24 134:20 139:7 convicted 211:9,9 conviction 188:15 189:20 196:25 convictions 187:23 188:9 189:16,22 190:4,6,18 192:8 193:2 209:9 cooperation 46:17 cooperative 130:6 cope 34:7 copy 81:1 130:4 core 116:7 141:10 149:13 184:10 corner 1:14 corporate 5:8 correct 4:6 33:1 133:7 141:8,8,13 141:20,24 142:22 145:10 150:25 151:7 152:2 154:22 157:3 171:7 172:11,21 173:23 175:14,16 178:6 179:9 182:7 186:10 190:8 191:8,16 193:10 207:9 209:14 210:11,14 211:14</p>	<p>212:9,15 213:15 217:20 correspondence 102:25 cosiness 45:14 cost 123:18 126:19 costs 109:23 cosy 40:5 79:4 Council 158:13 counsel 76:24 counted 47:10 country 16:20 110:11 116:9 208:1 couple 56:16 course 12:20 21:25 25:9 35:8 44:18 48:8 64:9 74:12 81:4 106:3 118:7 118:25 119:20 130:5 138:16 140:22 157:6 176:23 184:7 202:12 219:13 courses 119:7 court 11:15 cover 180:6 covering 58:7 covers 167:25,25 CQC 24:11,19,22 24:24 25:1,4,12 25:22 26:4,14,20 26:24,25 27:4,9 27:14 153:7 156:18 cracks 45:19 CRB 71:10 cream 127:20 created 33:13 92:10,13 creates 134:13 166:7 creation 86:7,7 87:23 criminal 105:18</p>
--	--	--	--	--

198:15,16 199:5 201:6 212:4 213:13 crisis 87:19 criteria 36:11,13 74:15 95:14,23 136:5 137:2 181:8 182:1 critical 66:17 72:1 criticism 48:21 cropped 39:25 56:14 cross 165:22 cross-checking 67:4 cross-Ofsted 83:20 crossover 97:5 crucial 164:6 crudest 144:2 cruelty 211:22 CSCI 33:20 86:2,8 88:3 118:9 CSCI's 127:13 culpable 31:22 cultural 122:15 culture 51:1 68:20 69:15 77:12 78:5 93:20 154:7,16 164:5 165:23 166:7 181:4 cup 147:15 cupboard 15:10 curious 73:1 current 7:10 13:10 101:19 120:13 129:9,12 177:11 184:4 213:2 currently 4:3 6:24 26:13 39:19 44:15 73:17 121:4 123:7 136:9 183:2 192:25 195:21 curriculum 126:4 145:11,23,25 146:7,10 167:14	167:17,19,21 168:3 curtain 170:17,20 custard 127:20 custodial 190:14 customer 208:3 customers 207:14 207:20 cut 90:3 144:23 170:3 cut-off 119:17 cut-offs 117:10 cuts 126:22,24 cutting 134:23 cycle 41:9 cycles 41:10 <hr/> D D 188:5 199:21 222:14 daily 166:13 damage 93:12 Dame 18:21 20:14 20:24,25 21:7 24:7 27:16 158:15 161:4 167:1 data 162:12,16,17 163:5,17,19 database 82:8,10 date 43:25 119:17 dated 3:17 17:25 dates 42:24 daughter 52:7,7 64:23 day 1:3 8:11 16:21 39:10 45:21 47:7 47:21 116:14 124:10 133:2 146:12 161:11,14 163:1 222:11 day-long 25:9 day-to-day 111:11 150:23 200:16 205:2 days 18:8 35:4 58:2	58:5 76:23 100:9 118:23 119:9,13 155:23,24 194:18 197:12 DBS 43:8 44:7 75:23 201:19 206:24 207:12,19 208:24 209:16,19 220:6 221:3 DBS000099 179:17 DBS000108 180:10 DBS000126 178:12 de 130:14 deaf 142:20 143:8 143:18 144:3,4,25 146:24 147:3 175:3 180:5 deaf/blind 147:8 deal 2:23 46:5 53:24 56:23 74:9 78:2 84:23 87:1 108:9 119:22 129:7 146:22 dealing 5:25 62:21 dealt 54:12,18 61:25 84:23 98:16 150:14 Dean 5:17 debate 201:16 decade 112:5 decay 80:18 decay/deteriorati... 80:18 decide 73:15 220:2 decided 23:10 54:6 106:16 181:11 192:17 213:4 decides 65:7 decision 23:14 31:21 55:20,22 68:19 79:15 145:3 175:17 178:13,13 178:14 179:10 181:14,19 182:3 192:12,15 204:13	212:14 215:2 219:12,13,17 220:16,18,22 221:1,1,6,9 decision-making 216:24 decisions 145:8 204:17 221:12 decreasing 130:24 deemed 176:18 defective 81:9 Defence 119:24 definitely 60:7 67:19,22 70:19 92:8 99:24 118:19 162:3 166:7 definition 32:11,14 117:14,16 193:25 194:1,2,21 195:21 196:12 197:6 200:10 204:5 205:11 206:7,8,20 206:20 207:21 208:2,9,11 definitive 11:14 degree 14:7 130:1 201:14 208:13 209:1 degrees 128:4 delay 165:5 delegate 151:24 deliberate 107:23 137:3 deliberately 105:22 119:13 120:24 deliver 170:21 delivered 25:6,20 25:21 Demand 10:12 demonstrate 19:16 61:3 192:23 demonstrated 178:18 demonstrating 177:9 179:2	department 37:4,8 56:24 57:1 62:23 110:7 111:16 114:1 129:16 134:4 164:4 178:2 178:4,10,14 179:8 179:18 180:11,12 180:13 181:11,14 181:17,18,20,21 181:23,24 182:3 182:12 187:17,18 203:9 205:17 206:15,16 208:3 210:19 departments 153:9 209:20 depend 211:14 dependence 107:6 dependency 159:4 depending 69:20 148:3 167:21 170:22 188:10 209:16 depends 7:5 24:24 76:25 203:14 deploying 29:6 deprivation 95:9 depth 22:20 deputies 153:9 deputy 43:25 44:5 66:22 describe 24:7 31:23 32:23 33:3 76:6 80:24 149:6,18 155:4 158:25 159:2 described 24:6 40:8 146:21,21 149:8 157:18 159:1,5 161:1 166:14 168:20 169:3,5 describing 150:5 157:14 description 7:10 designated 153:8
--	---	--	--	--

153:22 163:20 164:22 165:4 designed 79:21 134:23 despite 92:16 94:5 174:17 detail 5:25 12:19 12:21 84:24 129:4 142:1 176:13 185:7 211:6 detailed 162:24 172:13 173:25 details 52:15 164:4 172:17 176:10 determinations 201:2 develop 25:3 124:3 126:17 159:11 167:10 168:24,25 developed 167:12 169:15 development 4:24 82:17 83:15,16 95:9 98:8 153:15 developmental 78:8 134:25 devised 82:23 DfE 13:5,8 28:17 32:20 38:1 57:9 57:13,22 58:14 59:3,15,17,21,22 61:10,11 63:3,3,6 64:15 65:13 85:7 94:14 95:8 96:14 100:23 105:16 112:13 113:12 114:12 134:8 135:13 136:9,23 137:11,24 138:8 176:16 DfES 180:8,15,17 180:23 182:10 diagnosis 134:15 dialogue 77:17 134:21	differ 107:18 difference 7:1 35:22 40:23 51:7 89:3 94:9,12 106:10 120:17 124:1,1 127:2 211:18 differences 122:15 different 6:23 8:20 9:9 14:2 16:19 17:9 18:2,3 37:22 37:25 49:10,14 59:13 66:3 77:6 78:13,15,16 79:1 83:10 85:24 90:3 90:10 94:20 95:14 97:11,14,25 99:18 103:8 118:15 122:13,16,24 123:17 124:5 125:23 126:17 129:25 135:6 144:15 147:18 149:21,24 152:20 155:15 165:1,19 201:9 208:9 220:18,22 differentiate 169:3 differently 118:16 162:22 differing 23:2 difficult 7:15 13:25 34:7 63:13 68:10 122:7 137:20 157:23 171:18,19 171:22 177:20 207:8 218:16 220:16 difficulties 29:3 32:1 34:6 37:15 37:16 47:2 58:24 81:6 84:5 85:1 93:9 100:21 102:19 124:14 126:14 144:12,13	144:19 148:23 157:19 160:25 difficulty 22:12 dilemma 114:6 diminishing 20:11 dint 132:16 direct 100:18 135:10 185:14 direction 118:19 directly 20:20 23:4 124:23 151:13 director 55:12,13 82:2 90:16 112:22 152:16,16,22,24 153:4 186:8,25 Directorate 186:9 directors 110:1 150:22 151:1,2,18 151:24 152:11 disabilities 88:12 88:13 disability 23:7 31:23 disabled 13:20 167:1,3,5,7 170:25 disciplinary 82:16 142:13 175:5,13 176:2 183:13 disclose 159:10 disclosed 188:8 189:12 190:2 disclosure 186:12 186:25 187:22 188:1,2,2,5,7,15 188:20 197:7,22 199:8,20 206:16 207:17,22 210:18 disclosures 122:8 discouraged 92:9 discover 64:5 136:19 discrepancy 63:11 discrete 26:1,5 discretion 149:17	203:20 214:21 215:10 discretionary 214:20 discretionary/ma... 217:13 discrimination 31:23 discuss 14:14 175:23 discussed 84:6 discussing 35:14 discussion 78:6 112:12 139:4 disease 101:6 diseases 101:22 disempowering 167:4 dismissal 176:25 dismissed 175:15 176:11 212:5 213:1 display 171:2 displayed 121:16 displaying 162:18 177:8 disposed 123:13 disprove 106:9 disputed 33:15,15 disrupting 104:7 disruption 105:10 disruptive 104:5 dissimilar 87:22 distill 138:14 distinction 47:6 122:19 distinguish 77:8 155:12 distinguishing 149:14 distress 148:25 162:9 174:19 distressing 174:21 diverse 14:2 diversity 28:12	120:7 doctor 52:18,20 doctorate 187:6 document 6:16 12:18 13:4,14,15 15:25 27:19,25 49:9 68:23 179:7 185:6 200:8 documentary 14:17 14:25 documentation 2:15 172:25 177:17 documents 2:17 15:7 53:11 105:22 140:13,14 141:22 141:23 184:22 185:5 doggy 116:14 doing 4:20 7:17,17 7:18,18,21,22,23 29:19 43:3 46:5 55:4 59:15 102:9 102:9 108:1,5 122:5 130:18 157:5 163:11 169:4 194:19 195:1 205:15 208:19 216:11 door 19:20 double 14:20 16:5 47:9 doubt 47:4 99:4 181:1 Downey 207:17 209:7 Dr 184:16,18 185:23 186:15,18 186:20,23,24 187:4,8,13 206:23 207:1,5,8,24 208:17,23 209:1,6 209:14,18 210:2 210:11,14,17,25 211:14,21,25
---	--	---	---	---

212:9,11,15,20,24 213:7,12,15,18 214:1,10,15,23 215:8,11,13,16,25 216:8,14,23 217:20 218:5,9,14 218:16 219:6,15 220:2,8,12,20 221:3,16,21,24 222:2,22 draft 133:15 drafted 39:19 drains-up 80:23 draw 159:19 drawn 31:5 draws 9:10 drink 147:14 drinking 194:23 drinks 147:17 drive 159:14 driver 216:3,16 217:18 driving 194:10 drops 218:13 drugs 211:23 DSL 51:16 155:8 166:16 dual 156:1 dubious 199:5 due 176:23 184:24 duration 117:5 duties 178:25 duty 98:21 106:24 108:10 176:21 212:22 213:6 dynamic 145:25 167:21 170:22 dyslexia 34:6 36:4 36:7 dyspraxia 34:6 36:4,7	Ealing 213:23 earlier 42:17 70:4 113:10 114:25 115:4 134:20 137:3,8 146:10 169:5 220:14 Earls 5:15 28:20 31:14 32:22 33:16 34:4 36:3 44:19 56:4,14 90:14 133:4 early 4:14 14:14 56:14 70:14 78:11 180:19 earth 60:10 easier 38:3 67:24 81:19 208:14 easiest 215:4 easily 70:16 208:16 easy 32:17 122:11 157:22 209:4 eating 194:22 EBR 66:9 echo 78:1 educated 143:8 education 4:8,19 4:20 5:1 9:7 10:3 10:23 13:11,14 16:11 27:7 28:15 32:15 37:4,8 46:9 47:25 56:25 57:1 62:23 84:2 89:9 90:17 97:9,17 98:7 110:7 111:16 126:16 127:10 129:16 134:4,7,9 143:6,11 144:5 146:4 156:2 160:9 166:23 167:3,11 167:14,16,20 171:1 178:4,11 180:12 181:12,18 181:21,24 182:12 183:6 187:18 203:9 205:18	206:15 educational 51:25 74:20 78:22 115:24 118:14,21 180:7 194:10 educationally 39:20 191:25 effect 10:9 17:16 25:17 106:3 108:21 119:23 130:14 167:5 187:16 202:1 206:25 effective 7:13 32:4 67:17 89:17 effectively 7:23 66:24 90:10 130:21 194:18 210:15 effectiveness 31:9 44:24 131:7 efficient 7:14 127:16 effort 14:17 77:22 eight 82:2 89:17 either 60:24 68:19 69:19 73:9 88:12 89:3 123:8 185:17 185:23 190:15 194:24 204:7 206:7 211:6 212:5 212:7 215:7 217:15 221:2 elaborate 190:22 elderly 88:13 elected 150:21 electronic 154:1 162:16 element 85:23,23 91:10 101:22 162:10 187:16 195:23 elements 194:7 eligible 197:22 198:2,4 207:22	else's 27:24 119:19 emails 154:4 166:19 embed 154:15 embedded 17:24 150:16 emerged 35:23 53:3 emergency 85:6,10 85:12,17 135:25 emotion 25:7 emotional 18:19 36:16 93:8 98:8 101:14 173:9 194:10 emotions 171:15 emphasis 14:10,18 78:3 88:23 emphasise 170:21 employ 131:5 192:13 employed 6:19 44:7 44:9,11,13 87:5 180:5 189:18 191:7 198:14 employee 164:7 employer 188:16 188:18 190:2 191:1 192:11 193:12,12 212:4 218:1 employers 188:14 191:2,3 214:17 217:21 employing 188:21 192:14 199:23 employment 45:9 192:19 enable 204:16 enclosing 56:25 encouraged 154:12 encouraging 154:8 endeavouring 72:13 enforceable 19:25	enforcement 83:1 113:4,13 engage 118:17,17 196:7 engaged 201:1 216:14 engagement 208:1 engaging 177:8 197:23 199:24 216:4,10 engender 196:18 English 148:6 enhanced 65:25 188:24 190:23,24 191:7,13 193:6,7 193:14,18 194:6 197:22 198:2,4 199:8,20 210:18 enlarge 164:16 enlarged 2:18 enlarging 189:6 enormous 131:9 enormously 87:4 117:3 enquiries 138:2,5 enquiry 63:18 ensure 21:3 29:10 30:6,9 83:25 ensuring 69:18 84:10 entail 4:11 entails 4:12 entering 201:11,15 entire 99:20 entirely 18:11 135:22 environment 93:20 143:2 145:2 163:14 environmental 157:10 equally 19:20 23:22 75:3 equipped 72:20 114:16
E				
E 141:10 222:14 E/10 141:10				

equivalent 132:7	everyone's 35:3	218:18	experienced 20:9	150:11 215:23
Erooga 166:2	evidence 2:6,19 8:7	examples 46:1 68:3	experiences 63:11	extremely 13:16
error 35:2	21:17 48:25,25	137:4 198:10	expert 185:16	37:25 54:25 55:17
errors 153:15	49:1,9,11 60:24	205:13 213:24	expertise 25:2	96:18 130:5
escalated 55:11	66:14 67:2,2 69:3	215:4	29:16 77:4 79:6	137:20 148:8
escalating 154:20	81:11 106:9	excellent 80:6	109:15 114:20	162:5 171:18
escapes 87:19	115:10,19 119:11	132:16,23	145:16	eye 162:8
especially 79:6	121:23 123:10,23	exceptional 160:4	experts 31:5 79:17	eyes 108:22 177:5
160:24	126:1,13 133:22	excessive 96:13,15	explain 59:6 69:13	
essentially 100:23	137:12 140:1	exchange 148:8	147:1 153:1	F
117:7 150:20	142:3 146:11	excitement 82:11	160:12 163:22	F 1 8,18
170:3 172:22	166:25 185:11	excuse 27:3	172:15 208:15	F/1 185:22,22,23
174:8 182:10	197:9 204:11	executed 105:19	216:20	F/2 185:21,23
establish 28:6	210:20 217:1,2,3	execution 56:11	explained 166:1	F11 140:21 172:14
133:2 179:25	217:6 218:2	executive 139:24	190:17	172:18
187:12 209:22	219:11 222:7	141:11 151:24	explains 11:10,12	F2 172:14,17
established 28:3	evidence-based	152:4 156:12	explanation 97:1,2	F3 140:21 172:14
133:20 199:24	82:25	exercise 59:18,23	explicit 134:1	172:15 173:14,17
establishing 77:11	exactly 65:6 108:13	65:15 203:23	explicitly 12:1	174:3,8 175:1,18
establishment	125:4 151:13	exerting 110:2	57:10	177:18 181:16,22
195:15 196:15	177:3 178:9	111:10	exploded 103:3	182:13
200:4 201:12	181:25 183:3	exhibit 27:20	exploration 60:7	face 60:17 108:3
establishments	Examination 2:3	exist 33:5 83:22	explore 32:3 60:17	171:15
180:7 194:12	140:4 184:17	121:4 124:19	145:5 207:11	facilitate 158:3
et 53:9,9 84:18,19	222:17,20,23	existing 109:13	exposed 51:9	fact 1:10 15:17
178:19	examined 208:13	exists 180:6 195:22	express 113:9,12	22:19 24:7,10
ether 55:16	example 12:1,3	expanding 11:23	129:19,21 160:18	28:6 31:4 33:18
European 116:24	14:5 16:7 28:20	expand 13:1,6 15:2	162:20 174:22	35:15,15 38:7
evade 204:3	37:15 39:1 46:23	15:24 73:11 214:2	expressed 113:21	50:25 51:13 54:22
evaluated 133:7	47:6 69:6 72:18	expectation 9:12	113:21 202:17	56:13 59:17 73:20
evaluation 13:2	73:18 77:11 83:10	111:2 200:21	expressly 206:4	81:17 85:22 86:25
89:24 131:6 217:2	90:14 106:18,18	expectations 73:18	extend 116:6 136:6	91:21 92:17 94:1
evening 49:24	109:20 110:20	120:9,13,14	137:13	94:3,4 97:23
146:14	121:12 141:17	expected 12:2	extends 99:9	98:11 100:7
event 27:12 56:4	146:23 159:16	13:16 14:24 40:11	extensive 12:6	108:18 111:7
112:21 119:2	160:11 161:2	68:23 72:20	19:16 30:14 64:7	112:6,16,18
events 25:4 31:3,8	168:10,15,16	expecting 200:25	extent 9:17 63:12	116:13 119:11
208:1	171:2 188:19	214:17	79:22 104:7 155:8	128:13 137:1
everybody 34:1,4	190:2 191:9	expedition 111:16	193:5	155:3 170:2
70:12 77:16 79:4	194:14 195:24	experience 4:16 5:4	external 154:23	179:13 201:5
86:13 107:15	196:2,3,3,9	8:18 19:16 22:24	155:1,4	204:5,6 209:7
108:10 114:25	197:13,15,24	29:23 30:4 74:19	extract 112:16	210:9 213:13
191:14 200:20	198:1 211:9 213:3	78:23 123:22	extraordinarily	factor 162:1
204:6 213:4	213:21,21 215:23	132:17 187:5	56:6 73:10 96:21	factors 39:3
218:25	215:24 216:3	207:23 209:16	extreme 93:14	fail 137:19 149:9

failed 53:2 66:7 145:14 213:20	feel 2:9,24 105:2 131:4 137:16	finished 30:25 31:2 161:14,15	follow-up 56:12 112:24	87:15 91:18 96:13 96:15 97:2 105:11
failing 10:13 66:23 66:25 113:18 213:16	158:9 162:22 165:15,15 171:11 184:23 185:17,18	first 2:25 3:1 5:12 5:24 6:9,21 13:15 28:5 31:14 32:7 33:13 38:20 44:4 54:4 56:15 69:8 71:17 85:8 103:23 106:5 115:23 134:14 139:1 167:10 179:18,21 185:19 187:9 202:21 203:13	followed 112:23 157:1 175:13	105:17,19 108:20 108:24 111:6 113:18 121:14 122:5 132:13,22
failure 56:7 61:3 103:16,18 204:13 213:23	feeling 139:8 160:13,14 161:16 161:16 171:17 213:7	106:5 115:23 134:14 139:1 167:10 179:18,21 185:19 187:9 202:21 203:13	following 13:6 20:13 28:4 31:21 50:7,11 54:22 123:1 132:25 145:11,23 212:7 222:11	founded 68:1
failures 71:6	feels 2:22 116:10 117:8 131:3,11 137:14	106:5 115:23 134:14 139:1 167:10 179:18,21 185:19 187:9 202:21 203:13	follows 15:11 19:1	founding 4:21
fair 89:12 90:8 110:11 120:9	fees 109:22 128:7,7	106:5 115:23 134:14 139:1 167:10 179:18,21 185:19 187:9 202:21 203:13	food 49:23,23 50:5 50:18 51:2	four 4:13,14 23:22 24:1 57:5 85:24 102:15 163:22 164:11,17 165:4 189:1,7
fairly 12:6 73:2 97:19 133:25	feet 65:8	firstly 2:7 9:11 28:5 31:16 45:24 59:14 67:12 85:16,21 98:16 106:1 121:24,24 184:21 187:16 192:1 195:14,23	foot 99:6	framework 9:1,4,6 9:7 12:25 15:23 21:15 22:6 67:21 97:18 102:20 103:9,11 152:8
faith 110:9 121:7	fell 29:4 118:14	31:16 45:24 59:14 67:12 85:16,21 98:16 106:1 121:24,24 184:21 187:16 192:1 195:14,23	force 94:15,17 95:13 96:10,11	frameworks 12:11 84:4 107:14 134:22
fall 9:19 27:24 33:17 45:22 68:22 190:1 197:17 198:1	felt 37:24 96:12,19 204:18	fit 19:17 21:22 97:19 183:4	forced 108:8	frank 82:19 107:2
fallback 117:6	female 211:22	fitness 44:12 110:16	forces 188:12	frankly 111:3
falling 45:18 47:17 90:19,22	field 31:5 185:16	fitted 102:20	Foreign 119:25	free 2:9,24 121:6 184:23 185:18
familiar 165:9	figures 199:6 211:2	five 20:9 52:9 217:6	forgive 1:22 221:21	free-ish 121:6
familiarisation 139:5	files 16:3 42:18	flag 139:12	forgotten 148:16 148:24 149:6 189:17	Freedoms 197:20 200:24 203:3
families 32:16 119:8	filtering 163:17	flawed 42:9 48:24 60:23	form 99:15 119:3 122:2 182:16	freelance 4:20
family 116:24 120:12,20 122:20	final 136:3 178:12 178:13	flaws 42:16 133:13	formal 70:15 90:5 112:13	frequency 48:1 87:12 195:7,8,10 195:16,23 196:6 197:11
famous 164:11 201:17	finally 105:15	flicking 162:8	forms 154:19 166:14	frequent 196:17
fantastic 75:7	find 7:16,20 11:21 32:11 33:10,18 40:13 47:20 57:18 58:13 59:10,25 61:8 68:8 69:5 76:20 78:19 80:8 106:9,19 111:3 144:15,16 157:23 161:6,22 168:14 210:17 219:20,25	floor 148:3	fortnightly 153:14 153:24,25 154:2 154:19 166:16	frequently 104:13 112:12 123:12 153:20 194:25 195:1
far 1:18 9:2,13 10:12 26:15 38:3 41:11 43:7 46:15 54:23 59:14 82:4 89:16 96:18 105:2 137:5 187:23 201:23 214:10	finding 43:12 69:16 106:2 158:21	flow 101:2	forward 28:3 65:17 203:3	fresh 220:11
fantastic 75:7	findings 66:15	focus 7:25 51:13,21 81:24 86:20,21 88:22,24 92:21 102:6 116:17 143:24 152:10	fostering 117:14,16 118:8,10,15 119:10	Friday 116:14
far 1:18 9:2,13 10:12 26:15 38:3 41:11 43:7 46:15 54:23 59:14 82:4 89:16 96:18 105:2 137:5 187:23 201:23 214:10	finds 43:24	focused 98:2 203:22	fostering/adoption 83:11	friend 40:9 72:1
fault 67:12	fine 1:17 12:22 45:12 61:18 84:22 101:8 140:11	focusing 6:8 25:8	found 1:8 31:22 34:7 41:18 43:16 43:22 60:1 61:9 63:24 66:20 67:8 70:14,15 74:6 75:18 81:6 87:14	friendly 40:22
features 165:25	finish 27:25 28:3 30:25 31:1,2,9 217:7	follow 66:19 106:20 183:8 209:12	friends 79:4 122:20	front 1:12 2:16 3:1 3:21 22:5 140:12
February 82:3				
fed 29:1				
fee 34:10 109:21				
feed 90:5				
feedback 207:20				

141:1 184:22 185:4 fruit 127:20 fulfil 73:18 90:9 126:10 full 4:7 47:18 63:7 107:2 fully 53:8 63:13 75:25 120:13,13 131:2 158:16 function 107:8 134:6 functioning 138:4 functions 77:9 114:17 funding 126:22 funnily 215:22 further 12:21 45:7 62:5 65:25 67:9 74:4 89:9 113:3 128:17 131:15 139:20 180:22 183:16,18 206:18 209:11 217:15 221:16 222:4,7 future 77:23 138:16	209:21 generally 41:14 47:7 71:16 95:10 109:12 206:14 215:12 genital 211:22 genuinely 139:15 geography 23:16 gestures 148:6 getting 2:16 5:2 20:18 21:4,5,6,12 32:4 38:10 40:25 47:17 54:19 55:16 60:5 77:19 79:13 130:11 160:5 193:6 gift 22:1 girl 52:21 girls 60:5 216:5 girls' 43:25 45:4,6 51:11 58:8 give 8:7 9:18 12:2 110:20 121:12,23 128:10 138:7 142:9,24 154:16 168:18 196:4 213:24 219:1 given 55:2 69:14 72:15 76:19 85:10 102:2 117:3 146:23 171:1 175:9 204:2 gives 118:24 giving 2:19 146:1 147:11 165:6 171:16 179:24 185:11 GMC 214:15 go 5:23 7:19 12:3 16:11,12 17:6 18:10 21:19 27:1 30:19 34:9 41:13 43:17 48:2,7,17 50:16 52:14 53:5 57:17,24 58:16	59:20 63:1 64:9 65:2,7,14,14 67:25 69:10,11 70:3 71:5 72:2 75:6 76:19 77:6 81:21 82:12 83:5 83:8,18 84:25 90:15 96:18 100:23 103:21 111:2 113:6 136:18 137:20 147:12 160:8 161:11 168:21 169:2 170:4,5 173:24 174:15,25 175:25 176:10,12 178:20,21 179:18 193:23 196:4 200:7 203:5,11 206:15 210:13 211:5,11 216:7 217:20,25 218:25 goes 22:16 74:1 176:13 179:4 181:6 217:11 going 1:21 2:8 5:12 5:14,15,17,18,19 5:25 8:17 16:17 17:13,14 18:5,7 19:2 25:13,15,23 25:25 28:19 32:5 35:16 36:1 38:12 38:15 41:21 45:16 45:16 46:4 47:22 48:3 49:16 54:6 58:13,13,15 59:10 59:10 61:4 62:10 64:13 68:6 69:7 72:17 73:6 74:4 76:22 78:21 79:18 81:19 84:23 86:11 89:6,13 90:18,20 90:20 93:3,3,4 94:7 100:8 103:2 105:10 111:8	114:22 118:4,17 118:17 121:25 136:3 139:25 140:5 142:3 143:10 146:20 147:9,10 150:12 150:16 154:14 160:8 168:12 172:6,12,14 173:13,24 174:15 181:12 185:7,14 187:9,10,13 200:20 207:4 208:1 211:4 220:1 gong 63:5 good 1:3,5 2:4 9:22 10:2 12:11 14:5 66:1 81:7,12 85:11 92:22,23 93:5 94:15,18 95:15 96:25 97:20 98:8 102:7 104:1 110:9 114:19 130:8 134:12 145:15 163:13 167:3 169:15 171:24 175:20 184:18 192:23 203:19,23 213:4 Gordon 129:1 gourmet 50:10 governance 78:19 79:2,12 80:3 155:2 governing 71:14 72:11 77:25 79:21 80:6,15 109:4 125:16 212:25 government 127:22 134:24 135:10 150:20 200:25 201:5 202:23 204:15 206:1,10 governor 80:9,11 governors 51:17,18	71:13,24 72:2,15 72:20 73:3,12,16 76:3 79:13,15,17 121:16 128:10 151:5,10,12,16,17 151:20 Governors' 73:21 great 10:8 46:5 63:12 78:2 105:12 146:21 196:6 211:6 great-aunt 118:8 119:4 greater 105:9 gross 176:25 ground 2:8 53:8 138:23 grounds 23:19 64:7 71:4 103:18 group 4:25 25:1 27:25 28:2,3 30:2 30:25 31:2,9 83:20 116:18 120:23 132:14,21 149:7 150:21,22 153:11,13,22 154:1 166:19 169:21 170:9,14 groups 29:25 60:3 116:16,20 122:24 202:2 growing 36:22 grown 143:21 guard 41:3 guardian 118:13,14 118:22 119:3 guardianship 115:25 116:25 117:2,3,9 guidance 11:1,14 12:14 13:5,7,23 25:3 42:3 46:11 55:17 67:21 87:11 94:14 96:6,10 167:7,7 194:9
G				
gain 26:20 galvanising 56:4 gap 90:22 149:7 196:9 gaps 81:10 90:19 gardens 115:25 gas 16:2 gather 207:14 gathered 69:2 83:14 gathering 162:16 general 5:19,21,23 40:17 72:4 79:12 98:25 109:10 111:13 113:5 115:18 133:14				

203:8,12 204:25 205:3,16,18,19,23 206:9,13,14,17,18 207:2,25 208:8 guide 38:8 guidelines 181:7 guilty 215:6	67:15 77:5 78:14 94:13 97:4 116:10 162:25 163:2,18 170:20 171:17 happens 58:2,4 75:24 110:3 125:20 happiness 162:9 happy 23:9 51:2 104:14 130:5 161:16 180:18 207:12 208:18 harassed 52:12 harassment 52:11 53:6 64:23,25 hard 73:17 109:15 harder 99:6 harm 93:23 94:1,5 101:14,14 165:22 209:10 212:7,8 215:7,7,8,20 216:6 harmed 52:6 harmful 167:5 216:11 hat 86:13 114:13 head 19:6,22 36:12 43:25 44:5 45:3,5 51:16 53:8 63:22 66:11,13,17,22 73:6 75:7 76:2 110:22 111:1 headmaster 53:4 60:2 65:24 heads 27:25 153:9 health 11:17 24:6,8 24:9,10,12 25:7,8 25:11,14 27:7 36:17 88:1 165:18 178:2,10,14 179:8 179:18 180:11,13 181:14,17,20,22 181:24 182:3 187:18 206:16 214:15 216:12	healthcare 194:22 hear 92:11 heard 5:3 21:23 87:23 115:19,25 140:9 143:3 146:10 155:21 156:17 164:20 166:25 204:12 hearing 1:4 39:25 66:4 144:9 149:23 165:7 170:25 183:13 heart 27:23,24 82:9 154:18 heartbreaking 145:17 heavily 64:8 96:9 131:4 heavy 65:7 heavy-handed 64:17 65:4 held 4:5,9 175:23 183:2 Helen 1:7,13 2:2 9:18 20:21 69:21 118:4 222:16 hell 70:12 help 80:15 108:10 134:19 135:1 142:6 158:24 159:11 160:12 161:5 164:13 173:1 181:15 196:20 208:1,9,10 209:19,24,24 217:1 219:21 helpful 13:10 17:20 17:22 38:8 74:24 84:25 101:19 117:15 118:19 168:10 205:15 209:17,18 helping 90:4 194:22 helps 27:5,5 38:11	77:17 90:2 100:17 hidden 105:22 106:3,21 hiding 107:25 166:10 high 95:24 102:13 147:24 148:7 156:18 159:4 165:24 high-functioning 35:25 high-priority 84:1 high-profile 70:2 higher 166:17 higher-level 153:20 highest 152:15 highly 32:9 66:17 104:4 162:11 historic 129:5 141:22 historically 110:8 history 139:15 hits 108:13 HMI 55:11 90:17 131:20 132:2 HMIC 184:5 HMRC 209:21 hold 49:20 196:18 holiday 117:4 holistic 9:7 holistically 150:3 HOM000032_083 203:10 HOM003302_003 189:4 HOM003302_006 200:8 home 8:13,16 16:7 16:9,13,17,23 17:4,6,24 19:13 19:13,19 38:3 65:2 85:5,15,22 91:6,9,10,20 92:18 94:18,23 95:3,15 96:16,24	97:4,8 101:9 102:14 105:8 108:1 117:4 123:25 124:7 125:11,13,22 143:11 155:12,22 186:9 187:2 191:12 192:1 205:18 206:13 208:19 Home's 94:19 home-made 169:18 homes 9:9 14:9 17:17 19:3 24:16 28:7 41:7 86:3 87:1,9 91:2 96:1 96:16 100:16 104:2 105:21 113:24 123:7 131:24 132:15 141:17 156:4,5,10 157:8 homework 134:17 220:25 honest 108:14,15 honestly 107:15 hopefully 65:12 189:5 hospital 193:13 hot 185:13 hotline 26:20 hour's 140:17 hours 2:9 17:8 55:21 136:4 house 43:25 44:5 45:4,6 158:11 huge 207:24 Humphreys 1:7,11 1:13 2:2,5,25 3:6 3:8,12,15 5:3,25 6:11,12,15 7:5 8:2 8:14 9:22 10:17 10:25 11:24 12:5 12:17,23 13:13 15:1,6,17,22
--	---	--	---	---

16:18 17:3,8,11 17:14,20,22 18:4 18:25 19:12 20:7 20:21 21:1,25 22:13 23:12 24:15 24:18,21 25:18 26:2,16,18 27:13 27:17 28:11,22 29:5,17 30:1,8,23 31:2,17 32:13,20 32:25 33:2,6,10 33:23 34:10,21 35:4,17,20 36:2 37:11,19,23 39:7 39:16 40:2,8,12 40:19 41:2,4 42:3 42:12,21 43:1,14 43:18 44:3,17,23 45:7,12 46:4,18 46:21 47:23 48:11 48:16,24 49:12,18 50:2,6,12,21 51:9 51:17,22 52:24 53:14,17,21 54:4 54:15 55:2,7,17 57:12,20 58:3,9 58:20,25 59:11,13 59:16,18 60:7,14 60:24 61:6,15,20 61:24 62:9,14,20 63:15 64:4,14 65:5,9,11 66:7,18 67:1,19 68:10,13 69:23 70:19 71:1 71:9,23 74:3,13 75:3 76:2,9,12,17 76:25 79:11 80:6 80:12 81:25 82:8 82:15,18,23 84:12 84:21 85:12 86:3 86:7,16,23 87:15 87:18,22 88:3,9 88:15,22 89:5 90:14,24 91:4 92:3,20 93:1,13	94:2,9 95:1,6,13 95:18,21,25 96:8 97:2 98:2,3,6,14 98:19 99:24 101:7 101:9,12 102:3,5 102:17,20 103:5 103:15 104:20 105:1 106:5,22 111:12 115:22 116:1 118:6 119:4 119:15 121:9 125:9,22 128:3 130:18 131:22 132:2,5,10 133:4 133:6,9,17,20,24 135:13,19 136:12 136:17 137:20 196:12 222:16 hurt 160:13 hygiene 168:1 173:22 174:9,16 177:9 178:19 179:3 hypothesis 69:5 hypothetical 198:8 I ID 164:10 165:3 idea 213:5 ideas 208:17 identification 60:5 94:6 identified 18:21 22:12 29:22 30:19 32:1 37:21 38:22 42:16,17 44:20 49:4,15 50:14 51:6 54:10 70:17 71:4,8 74:13 81:5 91:12 93:7 99:21 104:10 108:18 112:6 117:20 123:4,24 130:13 133:13 197:6,8 217:10	identifies 52:15 103:1 197:15 203:12 205:1 209:7 identify 27:6 30:12 32:18 38:16 43:6 45:14 49:10 52:21 68:7 70:8 74:5 77:4 93:6,21 104:8 105:14 106:1 111:14 126:24 135:24 184:7 213:13 identifying 35:22 47:12 76:24 92:16 105:23 187:19 195:14 identity 44:9 idiosyncratic 5:22 61:2 ignored 178:16 ii 3:20 illness 101:6 imagine 25:12 59:16 79:8 96:5 immediate 104:3 164:7 166:21 immediately 55:11 154:5 impact 15:8,12 22:5 50:6 60:21 75:4,11,13 161:19 impaired 144:9,10 149:23 impairment 147:4 imperfect 118:21 implausible 109:22 implement 23:10 implemented 22:19 84:20 156:24 202:3 implementing 206:24 implication 56:20 127:22,24 128:9	implications 84:3 128:21 136:10 206:2 important 43:7,8 50:21 72:19,19 75:4 89:22,23 96:5 99:9 100:16 100:20,20 108:16 120:17 143:1 145:10 148:9 153:25 155:11 156:8 159:25 162:5,11 169:7,22 169:24 170:7 197:2 importantly 82:20 impossible 68:11 80:4,4 129:19 impressed 22:20 23:3 improve 8:4 131:11 improvement 10:5 134:2,6,7,10,16 135:2,5 improving 207:24 in"/"You 208:16 inadequate 10:17 10:18 58:10 75:20 78:19 93:24 94:11 102:2 103:5 121:14 inappropriate 53:7 93:19 176:18 178:25 179:1 215:19 incidence 148:18 incident 63:17 64:2 161:20,21 164:8 incidents 52:16 63:23 64:10,12 66:20 67:4,6 71:14 75:17 97:4 98:22 100:4,5,9 100:10 101:4 include 7:6,9,11	30:21 186:12 194:13 211:21 included 6:17 includes 151:9 190:17 including 6:18 65:19 105:23 181:2 188:9 203:15 221:24 inclusion 220:7 inconsistencies 177:18 183:10 inconsistency 99:17 increased 128:11 136:19 increasingly 108:3 199:1,2 incredibly 139:2 187:11 indecent 211:10 independent 6:2,3 6:3 10:16 11:4 32:12,18,19 38:19 38:22 39:18 41:16 59:19 73:9,13,21 79:2,23 85:4 100:21 107:2,5 109:8,12,20 110:11,16,22 111:6,22 113:7 120:6 121:21 122:2 123:3,3 124:4 125:17 128:6,24 129:5,10 129:14 151:9,10 151:12,16,17,20 151:22 153:6 156:22 157:8,16 158:1 197:15 independently 159:7 indicate 185:1 indicated 185:3 201:18
--	---	---	---	---

<p>indicators 164:18</p> <p>individual 2:21 27:5 56:8 66:22 67:13 70:20 86:19 108:19 111:3 156:13,13 163:8 207:16 212:3,12 217:11,21</p> <p>individual's 203:16</p> <p>individualised 167:19</p> <p>individuals 14:19 62:6 72:10 73:15 106:25 109:19 193:8 196:13 202:6 203:20,23 212:16,18 217:10</p> <p>induction 164:2,3</p> <p>inevitably 128:20</p> <p>infantilised 167:2</p> <p>influence 110:2 111:10</p> <p>influences 131:10</p> <p>inform 7:8 53:2 210:3</p> <p>information 16:4 22:10 24:25 54:16 62:16 63:1,4 81:9 81:12 85:18,19 98:24 99:14,16 100:17,19 101:3 113:3,5 119:6 130:2 181:25 182:21 188:11 189:13,16,21 192:15 193:6 199:1 207:13 209:19,20 214:6 217:3 218:1,7,20 219:2,20 221:13</p> <p>informed 99:5 219:16</p> <p>informs 83:15</p> <p>infringement 201:20</p>	<p>inherent 35:6</p> <p>initially 33:10 59:4</p> <p>initiatives 159:13</p> <p>injured 92:2</p> <p>injuries 173:9</p> <p>injury 91:23,24 101:13</p> <p>inquiry 138:10 140:8 190:20 202:15 203:22 204:11 206:11,12 207:12,18 222:11</p> <p>insight 114:20 138:7 207:14</p> <p>inspect 22:4,5 24:23 26:4 39:5,7 39:9,11,11 41:5 45:16,16 46:9,9 47:20,24 48:7,10 63:13 75:6 83:10 87:8 108:25,25 111:21 113:7 131:23</p> <p>inspected 6:1,2,4 33:8,11,16,19,20 34:22 35:15 38:13 38:14 48:11 67:21 85:22,24 86:4 91:1,8,9,10 97:15 103:12 112:7 113:17 155:24</p> <p>inspecting 4:17 7:16 29:15 48:9 61:19 83:9 91:2</p> <p>inspection 4:13 5:13,16 8:20,25 9:4,6,7 11:6 12:11 12:14,25 14:16,21 15:23 21:15,16,18 22:17 23:13,21 24:1,5,22 30:9 32:4 34:21 38:20 41:13,17 42:8,16 43:3 44:21,22,23 45:1,13 46:3,6</p>	<p>48:4,18,23,24 49:1,3,4,5,19 50:3 51:5,21 57:3,6,8 57:14 60:22 62:11 62:17,17 63:7 64:19 65:17,18,20 65:22 67:17 70:2 70:7,9 74:2,14 75:16 76:5 77:2,9 77:15 78:1,18 82:4,25 83:8,13 84:5,14 86:5,22 86:24,25 87:2,11 91:17 93:16 96:22 97:9,13 98:25 99:14 101:23 103:9,11 106:15 107:7 114:21 126:25 127:14,21 127:24 128:14 130:7 133:1,10,12 133:15 134:21 135:14 136:18 156:18</p> <p>inspections 5:14 11:13 16:10,15 21:3,12 22:25 27:15 38:8,16 41:6 46:12,13,19 47:23 67:15 70:17 74:25 76:22 77:1 78:15 81:7 85:2 89:4 98:2 106:4 127:4 135:25</p> <p>inspector 4:4,7 15:24 26:19,22 39:14 40:4,4,15 40:24 41:5,15 42:13 50:3 55:7 58:15 60:13 61:18 66:5,10 67:3,7,13 83:5,7,9 87:6 91:22 92:21 97:18 111:20 132:11 135:5,6</p>	<p>inspectorate 11:4 38:19 41:17 72:11 89:11 107:3,6 111:6 128:24 129:6,11,14 134:17 184:3 197:15</p> <p>inspectorates 47:3 85:19 89:11,25 90:10 135:8 136:2</p> <p>inspectors 12:7 14:24 15:19 22:8 22:18 23:1,8,11 23:13,22 24:2 25:7,9 26:23 27:14 29:6,11,14 30:7,10 42:2,3 43:23 46:12 49:1 54:13 56:8 74:11 76:8,10 81:9 87:8 88:17 131:6,19,22 132:6,16,23</p> <p>inspectors' 23:4</p> <p>instance 143:17 163:8</p> <p>institution 14:12 124:7 139:6</p> <p>institutions 25:13 27:5,8 39:15 79:19 85:24 86:18 109:19 114:13 121:1,7 199:13</p> <p>instructing 194:8 194:25 197:14</p> <p>instrumental 126:5</p> <p>integral 124:11</p> <p>integrity 99:1,4,9 107:7 108:9</p> <p>intelligence 188:12 188:16 189:16</p> <p>intended 90:9</p> <p>intending 108:11 108:11,11 115:3 180:17</p> <p>intends 107:15</p>	<p>intense 22:23</p> <p>intent 119:16,18</p> <p>intention 108:1 134:24</p> <p>intentionally 137:5</p> <p>intents 34:11</p> <p>interagency 175:22 176:7</p> <p>interest 163:16 219:15,19,25 220:4</p> <p>interested 15:12,14 64:15 129:6 146:18 206:10</p> <p>interesting 32:10 32:11 85:16</p> <p>interests 79:16 130:6 204:18 220:3</p> <p>internal 102:25 133:2 138:7 179:17</p> <p>internally 62:15</p> <p>international 120:1 122:12</p> <p>interpreted 118:16</p> <p>interpreting 40:6</p> <p>interrogate 137:12</p> <p>interrogates 136:10</p> <p>intervene 185:18 187:14</p> <p>intervention 85:6 91:14,19 101:1 102:13</p> <p>interview 19:17,18 66:11 73:6 174:10</p> <p>interviewed 174:3</p> <p>interviews 60:1,3</p> <p>intimate 25:15 174:9 178:19 179:3</p> <p>intrinsically 97:23</p> <p>introduce 106:5 186:7</p> <p>introduced 6:5,10</p>
--	---	---	---	--

19:10 103:9 introduces 9:4 introduction 73:22 106:24 introductions 21:21 invariably 116:23 investigate 63:17 64:1 135:15 173:1 173:6 investigated 64:2 67:8 93:16 172:22 investigation 58:18 58:18,19,22 59:2 78:13 128:19 173:7 195:19 196:4 197:9 198:15 213:22 investigations 135:11 investigators 174:4 invite 35:7 invited 21:10 153:6 involve 147:2 involved 4:25 24:12 31:25 54:19 77:16 105:18 106:25 109:19 110:16 111:9 151:13 172:19 202:5 involvement 27:11 involves 195:14 210:9 involving 130:1 IRO 124:23 irony 48:15 irregularly 195:6 irrespective 65:13 195:5 204:9 216:6 ISI 38:7,18 39:6,10 40:3,4,11,24 45:16,16,19 46:8 46:23,25 76:13,14 129:8 130:9,24,25 131:14 214:7	ISI001487 43:17 ISI001593 48:3 ISI001593_003 38:10 ISI001598_004 11:8 issue 24:5 32:3,7 41:16 47:12 54:4 67:10,14,16,25 71:16,22 84:19 85:12 98:11 100:3 104:21 109:10,11 109:12 111:5,20 116:4 117:21,23 124:15 125:2 165:18 180:18 187:23 203:5 206:14,18 214:17 issued 188:13 208:8 issues 2:7 5:19 22:7 23:20 25:11 31:12 38:16 39:23 53:3 53:25,25 56:23 67:11 71:20 84:6 90:2 92:17 96:23 98:15 106:23 108:3,9,17,23 109:3 114:22 118:1,12 125:25 129:5 142:13 153:21 172:7,15 184:20 203:24 206:17 issuing 180:15 206:13 207:25 iterate 131:11 iterative 84:8	198:9,11 Joe 217:17 join 27:14 153:6 joined 82:3 89:7 joined-up 90:7 joint 24:21 25:2,3,4 27:4 89:25 130:1 Jolanta 139:22,24 140:3 222:19 judge 74:24 93:24 161:25 judged 10:18 103:5 judging 38:24 171:13 judgment 10:10 49:6 57:21 70:10 97:13,19 102:18 102:20,21 200:3 203:19,23 215:10 216:19,23 judgmental 78:9 judgments 84:16 97:25 July 3:17,18 24:1 105:15 jumping 162:8 June 76:4,9 78:18 101:24 103:3 Justice 187:17 justification 102:13 justify 101:1,1 123:18 126:19 181:1	138:14 169:9 kick 37:13 kidnap 211:22 kind 9:1 10:21 12:15 17:16 19:4 34:1 36:25 50:8 73:23 78:10 80:23 91:24 99:2 105:20 109:15 110:2 111:24 114:23 117:2 126:2 139:6 190:9 215:22 kinds 109:8 123:17 126:15 know 2:14,17 6:1 17:25 20:7 34:24 39:16 40:22 42:24 45:22 46:4,25 60:19 65:4 68:1,1 68:7,8 72:23,25 77:25 78:2 79:7,9 81:21 93:17 94:2 94:3 101:6,7 104:24 105:7 107:1 109:5 114:24 119:5 127:3 129:3 140:18 147:16 149:11 162:7,19 163:18 166:24 171:19 172:24 173:25 176:15 178:9 179:12 185:9,16 189:15 190:20 192:15 198:20 202:19 204:11 210:5 213:20 214:3 218:3,4,8 219:13 220:17 knowing 171:10 knowledge 3:5,14 4:1 22:21 29:8,11 65:25 69:24 77:4 141:7 186:4,21	210:24 214:9,10 known 19:17 64:13 83:7 185:12 knows 50:10 101:8
L				
				label 37:18 labelled 37:21 lack 52:6 92:6 149:4 167:6 181:25 lacuna 191:21,22 191:22 LADO 53:14,16,20 53:24 54:8,21 55:5 56:21,22 62:19,21 81:13 91:20,22 92:1,7 98:11,12 99:3,13 99:14,19,23 100:2 155:19 219:20,23 219:24,24 220:2 LADOs 54:14 92:3 92:7,9 98:16 99:15,18 lady 116:13 landscape 18:1,2,3 language 26:11 34:14 40:6 118:1 119:7 148:6 150:1 158:2 169:12 194:4 lap 68:22 large 1:22 5:6 6:16 23:18 37:14 77:2 110:5 196:19 largely 5:24 6:6 18:11 25:13,14 34:10 66:23 93:11 108:24 128:2 202:14 203:19,22 213:10 larger 88:11 109:1 largest 4:22 Lastly 140:19

<p>142:12 185:11 late 133:1 latest 6:24 launched 25:5 law 9:13,25 10:1,1 11:15 151:3,4 187:12 198:13 203:17 lay 98:3 layers 123:17 127:17,19,21,23 128:1 layman's 194:4 layout 170:2 lead 10:15 66:23 83:7 135:4 153:8 153:22 163:20 leader 170:18 171:14 leaders 50:13 99:4 leadership 22:7 77:24 81:10 99:1 102:1 151:25 152:4 learn 75:12 159:24 161:23 169:8 learning 22:16 30:13 34:5 82:16 88:12 144:12,13 163:13 169:5,9 170:11,16 183:6 learnt 14:16 leave 192:18 led 57:6 left 18:11 51:15 73:14 75:21 76:2 legal 11:12 32:10 107:14 206:20 legislation 15:3 18:1 119:15 219:16 legitimate 219:15 219:19,25 Lenehan 18:21 21:1,7 28:4</p>	<p>158:15 167:1 Lenehan's 20:14 length 190:14 lens 201:9 lesson 163:9 168:17 168:18,22 lessons 168:18 let's 58:5 65:21 147:7 213:2 letter 52:4 55:14 56:25 62:1,7 112:13,17,18,19 113:10 130:4 182:17 letters 63:22 66:5 level 14:13 23:2,7 27:4 29:16 30:4 36:24 46:16 47:5 55:22 72:21 73:3 73:11,19 117:2 125:4 130:9,14,15 132:8 144:17 148:10 152:15 154:3,23 158:4 160:1 161:20 166:17 167:8,22 173:4 188:11 193:17 204:9 207:22 209:22 levels 18:15 107:18 159:4 189:7 201:7 levy 123:9 liberty 95:10 licensing 116:3 lies 217:19 life 145:9,25 166:13 167:17 life-sized 169:13 light 95:9 178:8 219:10 221:12 likelihood 46:15 138:24 limited 13:19 71:15 194:12 limits 216:9</p>	<p>line 60:11 174:15 174:16 208:12 link 163:15 linked 161:18 links 66:2 list 16:1 28:6 30:22 44:6 175:10 176:16,17,17 178:3,5,10 179:6 179:14,25 180:3,3 180:6,16,18 181:2 181:8,13,16,19 182:1,10 183:9 193:18 194:6 198:3,5,17,18,25 199:7,19 209:8,9 210:7,8,18 211:5 211:11 216:7,9,17 216:22 218:19,23 218:24 219:1,4 220:7,10 listen 68:17 listened 126:13 listener 121:21 122:3 123:3 124:4 listening 147:22 166:24 170:24 literally 217:5 little 7:1 9:3 20:23 40:5 49:12 54:14 70:15 78:20 86:24 90:22 94:25 111:18 131:14 145:5 150:17 154:14 159:6 160:8 162:8 live 17:5 50:22 56:13 105:11,13 116:22 119:8,23 lives 93:12 104:7 living 8:16 10:17 14:12 17:12 88:10 88:14 104:4 local 35:5 46:23 53:18 72:12 82:4</p>	<p>85:20 86:1,4,16 86:23,24,25 87:3 87:11 93:11 99:3 117:21 118:11,15 118:23 145:12,18 149:15 153:7 155:6,12,12,13,15 155:16,18 173:5,6 183:6 locally 23:14 log 149:16 long 4:5 30:22 35:8 87:15 92:4,5 95:11 112:8 116:4 120:12 132:24 194:16 longer 21:22 32:11 40:16 42:20 98:21 110:24 144:3,4 176:3 190:1 longstanding 173:17 look 11:21 15:7,8 15:14,20 16:11,12 20:15 23:21 26:24 27:1,6,21 32:20 37:7 41:1 42:5,14 42:15,22,25 44:4 50:15 51:5 52:2 53:10 57:3,16 58:5,12 59:4,7 65:21 66:10 68:1 68:6,14,16 90:21 104:18 117:1,8 118:4,10,22 119:16,18 122:7 124:18 140:15 141:2 142:8 143:17 150:13,16 150:17 154:4,14 160:8 163:4,7 164:12 166:20,22 172:6 186:16 187:9 188:25 203:10 219:24</p>	<p>221:8 looked 9:15 17:19 27:10 34:12 42:4 42:19 49:2 51:7 57:11,15 61:10 63:6,19 67:3 84:11,12 87:14 89:4 92:22 118:7 124:20 125:5,8 177:13 180:25 215:22 looked-after 93:10 125:6 looking 12:7 24:12 25:2,3,25 26:5 34:12 42:10 45:17 45:17,19,21 60:6 67:5 68:2,7,9 70:3 71:13 79:11 85:18 97:10 102:14 108:6 122:17 124:15 127:4 128:18 130:24 137:17 141:22 142:4,12 148:7 154:18 158:23 163:20 164:8 176:3 177:5 180:24 194:11 196:16 204:16 looks 8:12 9:8,22 10:2 12:9,12,12 19:2 29:22 58:17 134:14 153:15 160:16 204:25 205:2,3 loop 84:8 loose 1:12 3:10 70:12 Lord 130:4 lorry 216:3,15 217:18 lost 55:16 lot 2:8 5:8 14:10,18 18:8,16 29:9</p>
--	---	--	---	--

33:14 47:20 50:25 60:9 69:3,15 72:15 78:7 103:15 105:22 116:9 120:15 149:17 155:21 158:14 170:7 190:21 204:10 208:8 lots 7:7 16:19 24:25 28:23 42:10 49:22 51:15 54:19 76:21 86:20 103:7 117:25 118:1 154:17 201:21 lovely 72:8 low 109:22 148:17 161:23 low-level 165:8 lower 148:10 lower-level 100:25 lunch 115:4,4 Luncheon 115:14	55:22 79:15 84:8 93:14,17 101:18 102:8 124:17 127:24 138:20 139:5 146:1 204:15 213:11 manage 19:19 38:4 107:24 manageable 14:8 managed 18:9 36:7 75:18 82:2 management 4:21 82:4 84:17 96:9 102:1 150:23 manager 19:12 41:12 70:5 77:23 83:8 managers 30:8,9 50:13 83:2 89:21 99:4 managing 4:17 132:15,15 Manchester 5:18 69:12 140:2 141:18,19 142:5 142:19 143:15,23 156:2 165:12 168:5 172:10 175:4 177:16 mandation 73:8 mandatory 165:25 166:2,6 212:23 213:6 214:19 manner 12:7 178:25 March 103:5 Marcus 166:2 Maria 112:19,20 marker 117:15 market 75:1 109:2 marking 134:17 married 110:23 Mason 203:1,4 masses 13:23 masturbate 168:25	170:5 masturbation 168:24 171:9 mat 147:21,23 148:2 material 5:7 37:11 37:13 136:22,24 137:16,18,21 180:24,24 matrix 75:7 mats 147:18 matter 53:14,15,17 55:8 63:21 117:5 134:10 181:21 matters 6:17 55:14 58:22 63:12 67:8 102:7 124:16 206:14 211:10 214:8 maximise 138:24 maximising 101:2 McCall 139:22,24 140:3,5,25 141:11 142:3,17 146:16 148:11 150:14 155:20 156:10 164:13 168:10,15 172:6,12,14,19 173:13,24 175:20 176:17 180:1 181:15 182:8 183:15,19 219:23 220:14 222:19 McCall's 142:16 172:16 219:10 meal 50:10 mean 7:6 15:13 17:23 20:7 21:4 28:19 35:5 39:10 40:13 46:16,22 47:2 49:13 53:24 55:13 61:6 65:23 71:11 76:6 81:24 86:20 92:4,18 103:19 115:9	118:20 122:16 127:17 147:20,21 148:16 149:10 151:10 183:1 187:14 193:22 205:6 214:7 meaningful 23:6 means 9:17 24:22 45:18 60:8,18 69:4 85:14 107:7 120:16 127:17 130:11 146:1,8,25 147:4 149:3,8,21 150:1 151:12 158:11,17,21 189:23,24 197:10 199:18 216:21 217:14 meant 62:16 71:4 80:10 132:13 197:13 203:9 measles 101:20 measure 95:12 measures 78:4 142:10 mechanism 72:8,14 182:5 medical 44:12 52:17 144:8,20 150:1 153:15 156:18 173:10 medicine 143:4 mediocre 10:10 meet 30:7 36:20 95:6 145:16 154:2 194:15 195:6,8 215:19 meeting 10:14 94:11 145:19 154:3 158:11 175:17,23 176:6,8 176:22,25 meetings 166:16,21 meets 77:21 92:12 151:6 153:13,20	153:24 200:4 member 68:25 75:8 94:16 151:25 165:2 173:17 184:2 members 94:17 140:20 142:14 150:21 151:15 155:4 166:18 172:9,14,23 173:16 members' 154:4 membership 153:5 memo 179:17 180:11 memories 56:13 memory 2:8 5:9 140:10 184:21 mental 24:10 25:8 25:10 mention 140:6,22 157:5 mentioned 59:6 137:3 148:15 158:15 mentoring 197:25 merged 90:11 merging 17:16 met 91:13 92:15 158:18 183:25 184:7 Michael 80:22 middle 69:11 207:23 milk 161:13 Mill 68:5 85:3,21 93:6 Miller 112:19,20 Mills 5:16 mind 11:23 20:18 38:10 60:10 189:5 minders 113:25 mine 50:1 minimis 130:14 minimum 6:5,7
M				
magic 20:22 main 36:3 134:22 146:3 152:13,23 155:16 165:20 171:8 187:25 201:25 208:5 mainstream 34:7 36:8 121:25 122:14 124:6,9 143:13 maintain 94:15,17 95:14 maintained 18:9 73:5 121:12 Majesty's 4:3,7 184:3 major 49:25 majority 39:5,9,15 88:3 132:6 143:16 151:22 making 47:18				

7:19 14:22 15:2,4 19:23,24 22:14 29:23 30:4 33:13 33:14 77:21 109:24 120:5 121:4,22 156:6 ministers 129:25 135:10 Ministry 119:24 187:17 minor 190:12 minute 41:22 97:6 208:19 minutes 2:13 23:19 115:1,2 217:6 miraculously 47:1 misconduct 176:25 mismanagement 173:10 missing 7:15 93:4,4 102:11 mistreated 138:25 misunderstood 62:7 mix 124:13 Mob 65:9 mob-handed 76:7 mobile 121:8,11 164:22 model 14:15,16 128:15 134:8,15 168:16,17 models 127:14 130:2,7 modern 117:9 122:21 moment 13:14 19:4 37:3 68:6 74:18 77:21 87:20 98:24 114:4 130:13 139:16 144:21 149:19 168:7 199:19 206:19 207:6 208:12 209:11 210:6	218:12 219:7 money 127:11 monitoring 130:14 154:19 202:6 month 157:12 195:2,3 monthly 125:14 157:8 months 44:7,8,10 44:13 56:16 70:13 132:10 mood 160:23 161:5 161:6,10,17,20,25 162:2,14 163:5 morning 1:3,5,6 2:4 155:21 156:17 222:8 mother 174:7,17 178:17 motion 178:4 motor 37:15 move 31:11 119:13 moved 34:23 82:1 86:8 89:5,9 moves 83:9 121:20 MSI 147:19 multi-agency 175:22 176:25 multi-sensory 147:4 multiple 47:3 mum 65:2 murder 211:22 music 71:19 125:24 126:3,4,11,15 192:2 Muslim 121:9 mutilation 211:23 mutual 130:2 <hr/> N <hr/> N 222:14 naive 204:2 naivety 204:22 naked 173:19	178:16 179:2 181:3 name 87:19 names 140:22 narrative 49:7 narrowly 109:9,25 national 6:5,7 7:19 14:21 15:1,3 19:23,24 20:3 22:14 31:6 33:13 33:14 55:13 74:5 87:24 120:5 121:4 121:21 145:11,23 151:19 167:8 nationally 148:20 naturally 143:20 nature 34:3 35:14 36:5 38:14 54:16 55:10 77:1 88:5 89:4 114:19 126:18 190:12 203:16 NC 86:2 NCSC 33:11,12,19 35:4 86:3,7 88:1,3 near 109:23 nearly 80:8 neat 117:12 neatly 121:20 necessarily 7:5,6 10:15 18:6,10 29:17 73:24 79:5 96:4 103:15 123:12 124:13 126:19 127:21 133:22 134:14 136:15 195:13,25 197:17 220:9 necessary 24:2 26:2 77:2 necessitate 104:3 need 2:13,17 7:7 10:8,10 13:23 18:10,14 19:4,15 22:17 23:20 25:19	25:24 26:24 29:10 35:8 42:24,25 48:17 49:8 50:15 53:10 54:21,22,23 56:23 57:15 60:17 70:21 74:19 77:3 77:22 79:6,9 81:3 82:10 84:9 101:7 104:18,19 109:4 111:7 116:25 117:8 122:16,23 124:18,24 128:20 134:21 139:10 140:10,16,18 144:17 148:11 149:16,17 150:17 160:13 169:3 176:15 190:22 193:14 196:15 200:1 201:23 211:5 219:25 needed 23:1 29:5 56:25 57:9 117:10 120:18 126:2 137:25 202:22 needing 56:10 needs 8:16,19 13:20 14:1 18:4 18:13 19:14,15,22 23:5,15 24:8,9,10 27:6 28:8,16 30:13 31:21 36:6 36:14,20 39:20,21 52:1 74:17,20 76:21,21 78:22 79:10 95:21 106:24 108:4 116:2 120:21 124:14 125:10 130:10 135:1 142:7,23,25 143:19,24 144:6,8 144:20 145:16,19 145:24 149:11,15 149:16,21 150:1,4	150:8 156:18 157:11,25 158:25 167:21,23 185:9 200:4 205:23 nefarious 216:4 negative 220:15 neurological 144:7 neutral 154:12 165:8 170:1 never 42:18,18 46:13,14 64:6 158:18 190:7 new 75:22 82:8 85:9 103:9 134:22 137:15 167:16 218:20 221:7,12 night 50:9 nine 113:18 NMC 214:15 NMS 6:15,20 8:10 9:20 10:25 11:2 17:18 21:22 96:8 125:15,19 nominated 156:13 non-association 108:25 non-compliance 107:23 137:3 non-compliant 112:4 non-special 37:7 norm 135:7 normal 139:5 159:9 note 20:18 40:2 57:22,23 114:24 143:1 146:5 217:5 notes 2:10 notice 85:12 103:13 103:16,16,17,19 103:20 104:21 171:24 noticed 173:4 notices 103:6,8 notification 165:8 166:19 180:16,19
---	---	---	--	---

<p>notifications 37:2,9 55:18 99:10 100:1 notified 20:8 63:23 100:6 notify 98:21 100:23 136:22 notifying 181:10 notion 106:6 notwithstanding 56:18 77:20 97:20 120:20 NSPCC 172:19 173:7,25 174:4,10 174:23 175:24 176:2,7,24 195:24 204:5 number 1:23 8:7 17:5 18:17,19 20:2,3 21:14 23:23 24:15 26:1 31:20 32:2,2 33:12 37:14,21 38:8 46:8 56:9 64:11 70:11,14 72:5 88:11 89:8 98:15,16 107:22 107:23 108:21,22 119:25 121:9 125:16 129:24 130:20 137:6 141:17 145:3 148:13 155:23 156:21 163:7 164:10,23 165:4 172:8 173:8 174:4 191:22 195:20 197:5 198:24 199:1,2,3,7,13 203:15 204:12 numbers 119:21 121:18 136:19 numerous 100:9 213:24 nurse 25:20,21 52:18,18</p>	<p>nurseries 113:25 nursing 25:16,18 nuts-and-bolts 12:15 NVQ 132:8</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 115:8 object 147:6,11,15 objects 147:1 148:4 161:1 obligation 99:13,15 108:14 212:23 obligations 134:3 obliged 103:24 observation 161:25 162:2,7,10 observational 30:5 observations 184:11 observe 75:12 83:9 obvious 122:5 191:21 196:8 obviously 5:3 8:10 12:10 35:2 39:5 49:19 54:25 78:20 80:21 88:15 100:6 101:18 119:25 129:7,22 130:25 146:18 148:5 152:13 166:11 184:1 187:14,24 192:2,10 203:22 206:10 210:5,8 occasion 5:4 65:6 184:8 occasionally 150:21 191:4 occasions 52:10 104:11 174:4 191:22 198:24 215:23 221:7 occupational 26:11 occur 46:7 occurs 212:3</p>	<p>October 1:1 44:2 52:5 178:7 odd 131:12 offence 198:16 212:4 213:14 offences 189:25,25 190:10,10,10,11 190:13 193:3 211:8,21 Offenders 187:20 187:24 189:24 offending 196:8 office 88:16 119:25 186:9 187:2 205:19 206:13 208:19 209:21 officer 153:10 184:5 offices 88:19 OFS001284_001 52:3 OFS005099 81:1 OFS009562 57:23 OFS009801_004 65:22 OFS011575 112:15 OFS011578_014 62:24 OFS011578_018 81:18 OFS011660 49:9 OFS011753_002 20:19 OFS011754_002 27:19 OFS011756_001 1:14 Ofsted 13:9 16:11 16:11,12 20:15 22:4 38:18 41:19 42:1 45:16,17,20 52:4 53:12 54:16 56:5 61:22 62:2 62:15 75:18 81:10 82:1 84:13 85:2</p>	<p>86:9 89:2,7,10 90:23 91:1,7,11 113:17 115:24 116:1 118:9 126:6 127:3 130:25 131:19 133:2 134:1,6 135:8,10 135:24 155:21 214:6,7 Ofsted's 86:18 106:1 oftentimes 50:1 okay 16:5 17:7 20:12 21:1,19 22:15 24:15 35:2 38:7 40:3 41:16 45:10 48:2 51:23 54:9 55:15 56:21 57:17 58:4 59:24 60:25 62:10 75:15 89:2 90:13 92:16 98:9 100:3 111:13 113:1 125:21 130:23 132:25 133:25 134:12 135:21 148:15 151:16 171:11 177:25 192:18 195:12 207:15 212:1 214:19 215:1 216:18 220:13 221:15 Okay,so 211:24 old 52:9 168:6,7 213:3 221:8 older 102:15 oldest 102:15 168:7 once 21:9 148:3 161:11 164:4,24 171:14 183:1 184:1 194:19 205:6 209:7 216:1 218:12 220:15 one-off 160:3 one-size-fits-all</p>	<p>122:18 ones 106:16 ongoing 202:5 203:14 online 65:25 onwards 38:9 open 40:23 68:22 113:19 154:7 164:5 openly 166:11 operate 57:13 108:12 134:7 138:25 210:13 operates 200:19,21 operating 134:23 137:1 152:20 184:5 185:11 operation 151:13 165:11 166:4 187:1 207:2 opinion 21:13 129:19 178:21,23 opportunities 158:14 opportunity 131:1 138:11,13 207:10 217:24 opposed 33:9 106:13 orally 148:14 order 8:4 19:18 36:8,12,20 39:21 89:14 94:15,18 95:15 119:13 123:8 136:24 138:4 145:1 163:2 163:13 191:13 196:7,22 215:4 ordinary 35:16 144:16 organisation 5:9 86:14 89:5 90:25 91:2 104:6 145:20 146:6 155:14,17 196:20 203:17</p>
---	--	--	---	--

216:12,13 organisational 86:21 organisations 26:9 181:23 199:13 212:18,20 214:6 ought 39:4 117:16 128:14 137:11 180:3 outbreak 101:20 outcome 13:3 66:9 97:13 100:24 175:15 176:22 outcome-focused 7:8 8:3 outcomes 92:21,23 93:2 97:11 98:7 102:6 outset 130:10 outside 22:6 131:10 135:3 137:1 155:1 outstanding 12:12 48:19 57:19 65:18 65:19 84:15 133:8 outstrips 10:12 over-refer 215:15 overall 97:20 102:2 152:19 155:15 196:19 197:3 overnight 143:25 overreport 154:11 overseas 116:8,21 116:23 120:11 oversee 126:11 oversight 26:14 116:10 126:20 129:10 owner/proprietor 94:24 108:23 109:2 owner/proprietors 109:3 111:7 owns 97:7	P 52:8,9 pace 36:18 pack 210:20 217:19 package 37:18 162:15 page 11:19,25 12:4 21:19 22:3,16 24:4 28:1 29:22 30:20,20 48:5 52:14 53:5 57:24 63:10 82:12 113:6 142:18 164:15 168:14 175:25 176:12 178:20 193:24 203:11 pages 43:19 169:2 paid 109:24 193:8 204:7 pain 162:10 palpably 58:10 panel 1:5,8,13 20:19 27:19 131:16,17 141:9 146:18 147:2 150:12 163:22 165:7 168:11 172:12 173:15 183:17,21,23 184:2 185:21 221:18,19 222:7 222:18,24 paper 3:20 20:21 27:20,21 92:22 93:14 98:6 103:14 185:4 paperwork 100:7 177:13 paragraph 11:10 11:19,22 12:4,4 112:16 150:15 155:5,6 174:14 188:25 189:6 193:23 200:7 parallel 9:6 parcel 121:3	parent 62:11 109:5 151:23 parental 51:5 parents 51:24 52:19 53:2 116:22 119:23 151:15,22 157:10 174:22 parents' 72:7 parliament 131:8 part 21:7,8 25:21 26:5 29:21 35:3 75:9 77:10 78:12 88:6,15 97:17 110:9 112:5 120:1 121:3 124:11 134:22 142:18 152:13 156:4,14 161:14 166:12 167:17 174:11 178:11 181:4 188:1,5 196:14 197:3 204:20 221:13 participant 184:11 participate 210:9 participating 77:15 participation 73:12 particular 8:9 10:20,24 13:9 23:20 26:8 27:25 33:25 39:2,20 40:15 41:12 46:1 49:23 53:10 65:21 70:15 78:21 79:16 79:18 82:5 85:18 87:7,10 90:4,25 91:12,15,19 99:19 106:15 107:4 108:19,23 109:3 114:5 116:15 117:20 125:2,25 125:25 126:6,14 130:23 140:22 163:9 168:17 171:4 189:18	193:11 particularly 8:8,15 13:11,23 20:12 25:8 32:6 35:23 36:15 50:13 51:10 54:1 60:1 96:2,5 100:4 117:22 118:13 121:6 122:12 126:23,25 127:10 190:9 191:23 197:11 partly 134:7,8 partners 32:2 155:7,9 parts 10:3 140:19 159:22 162:2 167:25 201:9 party 191:4 217:15 pass 139:21 187:13 211:4 passed 202:21 passive 61:13,18 path 135:1 patience 206:23 pattern 64:24 80:17,18 Pausing 176:17 paying 34:10 109:21 peer 169:21 peer-on-peer 53:24 pen 147:9 penalty 136:25 people 8:7 9:19 10:6 14:8,12 23:5 39:2 42:10,11 47:7,8,11 51:15 51:18 54:19 58:16 65:3 75:1 76:12 76:19,22,23 78:11 78:25 80:7 87:14 89:8 97:25 102:12 106:20 107:24,25 109:14 110:1,14 110:17 124:25	138:21 139:6 144:18 147:22 151:12,14 153:6 154:8,8,18 157:23 159:23 160:12 162:6 164:1,6 165:6,20,23 166:10 170:13 176:18 178:8 182:1 188:20,22 188:23 191:7 192:4,6,11,22 195:19 197:6,10 197:11 199:4,7 200:21 201:11,15 201:21 204:3,16 208:5,8 209:4,9 210:6,25 211:7 213:10,20 215:12 216:21 217:1 people's 56:13 105:20 108:22 192:8 perennial 111:20 perfect 72:8 138:21 perfection 76:24 perfectly 61:17 performance 84:17 performing 194:24 performs 77:10 period 33:25 74:14 83:6 86:12 89:6 95:22 103:4,22 172:8 190:1 peripatetic 126:6 permanent 131:5 permission 115:3 165:6 permissive 73:14 110:10 permit 121:8 135:23 permitted 110:25 person 2:20,22 19:7,17 75:20
P				

95:19 97:7 98:3,4 102:15 114:12 123:4 124:10 125:17 164:22 165:5 175:7 178:23 183:4,9 185:14 189:11,12 192:13 196:1,2,3 199:23 200:15 209:12,23 210:4 210:17 213:5 218:20,22,23 219:18,21 personal 5:9 86:19 173:22 174:9 177:9 178:19 179:3 194:22 195:10,11 208:22 208:23 209:16 personally 91:11 personnel 51:15 84:19 212:20 perspective 111:21 114:6 130:25 152:18 208:22 peruse 12:18 phase 119:22 129:2 129:8 131:1 phone 55:3,5 121:18 164:10 165:4 phones 121:8,11 phrase 150:9 physical 24:9 25:14 88:12 91:14,18 92:24 95:23 100:5 101:14 102:13 144:24 173:9 179:1 194:10 physically 95:4 120:12 pick 25:10 50:12 147:15 163:8 picked 41:17,19 42:18 43:23 45:1	70:24 74:11 136:16 162:23 picks 75:24 pictorial 148:7 picture 47:18,22 75:9 77:10 218:13 pictures 213:4 piece 17:25 21:11 26:12 47:10 73:25 77:14 78:9 89:22 89:23 130:21 139:4 pieces 16:4 128:11 place 7:13 31:4 44:6,8,10,12,14 44:15 46:2,20 51:19 55:15 64:10 64:12 72:24 82:17 89:15 92:3 100:22 105:21 107:11 112:21 121:17 134:16 135:23 139:1,16,18 142:11 150:13 167:14 180:18 191:24,25 196:13 196:15 202:1,21 203:14 218:18 placed 78:3 93:10 149:2,8 155:14 179:13 181:16 198:17 201:1 209:8 placement 70:20 145:13 placements 10:9,11 places 194:12 199:16 placing 182:10 plan 56:11 68:2 83:15 90:18 112:1 planning 67:5 70:16 206:18 plans 70:20 206:7 206:19	play 62:8 plays 152:13 218:17 please 1:22 2:9,14 2:17,23 21:20 22:17 28:1 30:20 38:11 48:2,5 52:2 52:3,14 53:5 57:24 62:24,25 63:2,10 81:1,18 81:21 83:19 110:21 111:18 113:6 142:18 160:15 164:15 168:21 174:25 175:21,25 176:12 178:20,22 179:20 179:25 180:7 184:12,14,23 185:1,9,16,18,20 189:6 200:7,8 203:11,11 plenty 205:13 217:24 plus 1:9 pm 115:13,15 172:2,4 222:10 POCA 178:7 180:3 180:14 181:16 point 2:10 9:23 34:24 37:7,12 44:19 45:8,10 46:6 69:2,4 72:4,7 78:10,14 98:25 103:23 104:23 106:7 111:13 118:9 127:12 128:23 133:14 136:3 137:7 142:17 162:25 173:8 175:4,20 178:1 208:23 points 5:20 126:14 138:18 204:13,13 police 56:22 58:19	105:17 153:7 188:11 196:24 210:3,21,21 policies 4:25 15:6 66:25 69:9 138:20 196:14 policies/rules/laws 14:11 policy 4:24 11:1,22 15:10,15 43:2 71:7 84:7 131:5 134:5,10,24 186:11 187:1,16 187:19 206:25 208:20 poor 10:10 173:4 popping 205:6 population 36:22 37:1,25 120:7 146:22 169:4,8 portray 177:19 position 68:19 113:20 129:10,12 177:3,10 178:10 179:25 196:2,6,18 198:20 210:6 possibility 99:7,7 possible 37:23 46:14,20 67:24 72:14 84:8 97:15 104:6 122:11 135:4 136:2 139:5 145:21 158:1 164:19 198:23 201:11,24 208:7 possibly 33:2 35:5 41:24 55:12 62:17 63:20 64:17 96:4 124:25 128:16 199:5 220:13 post 4:5,9,11,12,14 141:14,21 post-dated 51:24 poster 159:20 posters 121:17	159:18 160:1 164:24 165:1 potentially 117:14 199:6 220:15 Povey 10:20 power 104:10 powers 59:1,18,23 65:15 85:9,10,17 104:16 105:3,5 135:22 209:11,19 practical 36:24 162:12 practically 80:4 practice 10:6 15:13 42:20,21 45:3 53:21 73:10 75:12 75:14 78:6 84:5 84:10 106:2 122:4 134:18 138:20 169:16 173:4 174:18,20 207:3 214:14 practices 93:19 94:6 172:9 174:17 196:20 pragmatic 122:6 123:16 pre-2011 100:10 pre-inspection 99:16 pre-registration 137:15 precisely 9:1 202:14 preclude 115:21 predecessor 56:5 80:22 198:18 predicated 99:1 predominantly 202:9 prefer 20:21 preferences 158:12 preliminary 2:7 184:20 premises 6:18
--	--	---	--	---

<p>preparation 39:25 146:3 170:8,8</p> <p>prescribing 165:13</p> <p>prescriptive 6:17 6:19 7:1 12:7,24 205:12</p> <p>present 35:25 113:23 176:5 206:7</p> <p>presentation 149:20,22,23</p> <p>presentations 144:14</p> <p>presented 34:15 69:23 102:7 213:8 217:4</p> <p>presents 144:10 214:24</p> <p>pressure 10:6</p> <p>pressurised 62:12</p> <p>presumably 154:20</p> <p>presumption 110:9</p> <p>pretty 145:17 169:12</p> <p>prevent 134:19 145:21 161:21</p> <p>previous 5:4 30:20 42:8,15 70:17 84:13,18 143:3 145:2,13 188:9 197:8 200:8</p> <p>previously 6:15 93:2 205:25</p> <p>primary 138:16</p> <p>prime 149:16</p> <p>principal 139:25 141:12</p> <p>prior 4:16 21:1 82:1</p> <p>prioritise 100:18</p> <p>priority 69:8</p> <p>privacy 160:19 171:16</p> <p>private 117:14,16 118:8,10,13,14</p>	<p>119:10 160:6 168:1,24 170:5 171:7,19 191:9 192:1</p> <p>privately 113:22</p> <p>proactive 54:24</p> <p>probably 11:23 18:9,23 20:7 38:12 44:18 46:19 49:14 88:17 95:8 106:10 115:1,21 117:23 120:2 128:10 139:13 140:9 144:16 171:22 191:10 212:2 219:11</p> <p>probation 83:6</p> <p>problem 9:1 35:6 41:23,25 45:15 46:2 49:15 71:18 73:24 79:13 217:9 217:9</p> <p>problematic 192:4 220:15</p> <p>problems 32:5 35:22 37:20 39:22 41:18 42:11 43:12 45:25 47:1 54:12 69:19 71:20 72:25 75:25 91:18 105:20,23,23 134:13 144:8,8 149:13 191:14 197:10</p> <p>procedures 102:10 153:18 196:15</p> <p>proceed 184:14</p> <p>proceeding 176:2</p> <p>proceedings 175:13 184:25</p> <p>process 59:12 77:15 82:13 175:5 190:21 214:19,20 216:20,23,25 221:3,11,14</p>	<p>process-driven 12:15</p> <p>processes 82:12,24 130:7 131:7</p> <p>produce 83:3</p> <p>professional 72:10 134:21 200:3,23</p> <p>professionalism 204:23</p> <p>professionals 68:15 200:25</p> <p>professions 188:21</p> <p>Professor 167:2</p> <p>profile 149:24 150:2</p> <p>profiling 149:20</p> <p>profound 23:5 144:13 157:18</p> <p>programme 25:6 30:15 90:1 164:2</p> <p>programmes 30:18</p> <p>progress 78:3 93:14,17 102:8 103:5 112:2</p> <p>progression 143:25</p> <p>progressively 134:11</p> <p>promotes 89:21</p> <p>prompt 37:9</p> <p>promptly 114:9</p> <p>proper 82:6 126:20</p> <p>properly 66:10 84:3 93:7 108:12 117:9 126:10 127:4 137:10</p> <p>proportion 109:1 128:9 131:25</p> <p>proportionate 95:22 103:25</p> <p>proportions 202:9</p> <p>proposals 20:17 27:17 28:4</p> <p>proposed 129:25</p> <p>proprietary 72:18</p> <p>proprietor 109:25</p>	<p>110:6,24,24 136:20 197:16,23 197:25 198:19</p> <p>proprietors 106:25 110:1 197:19 198:3,4</p> <p>prosecute 103:17 210:15 213:5</p> <p>prosecuted 213:16</p> <p>Prosecuting 210:25</p> <p>prosecution 210:3 210:21</p> <p>prosecutions 108:8</p> <p>protect 138:15</p> <p>protecting 207:6,6</p> <p>protection 11:2 59:2 66:24 71:7 106:14 123:17 175:9 178:3 179:5 179:13,23 186:8 187:7 197:20 200:24 203:3 209:25</p> <p>protections 123:20 142:10</p> <p>protocol 81:13</p> <p>protocols 25:3</p> <p>prove 193:5</p> <p>provide 13:5 15:24 28:15 72:8,13 75:7 99:16 123:9 128:13,15 130:8 130:15 135:2,24 145:2 173:2 206:9 217:15</p> <p>provided 11:15 25:16 26:6 27:18 38:7 63:4 141:23 143:6 207:18</p> <p>provider 9:8 75:6 99:2 104:21 106:8 135:1 143:10 212:20,22</p> <p>providers 13:1 103:15 106:6</p>	<p>119:12</p> <p>provides 13:8 58:1 138:11 193:24</p> <p>providing 11:5 70:6 77:10 81:8 144:5 145:22 146:7,11 163:25 167:18 194:9</p> <p>provision 9:14 24:13 25:16,18 87:6,7 88:16 90:4 97:24 150:7</p> <p>provisions 202:10 202:12</p> <p>psychiatric 26:9</p> <p>psychological 26:10</p> <p>public 1:4 127:3 128:12 138:11 160:7 168:2 171:3 171:7,20 186:8</p> <p>public-type 192:21</p> <p>publication 6:20</p> <p>publications 13:18</p> <p>publicly 113:21</p> <p>publish 207:2</p> <p>published 21:9 133:18 203:8</p> <p>pull 89:19 138:18</p> <p>pulled 108:21</p> <p>pupil 37:1 120:7</p> <p>pupils 11:17 37:15 51:20 96:3 102:14 142:5,7,23 144:21 156:17 160:10 161:1 166:23 167:10 173:20,21 177:6,7,8,9</p> <p>puppet 169:11,13 169:21</p> <p>puppeteer 169:23 170:17,19</p> <p>purely 78:12</p> <p>purpose 21:23 28:18 38:6 69:7</p>
--	---	---	---	--

134:1 156:15 194:17 purposes 34:11 136:6 push 108:10 131:11 put 10:6 11:9 13:15 14:10,16,17 49:5 49:16,19 50:14 70:3 75:14 123:14 131:13 136:24 139:11 142:16 154:9 158:5 159:17,21,22 170:24 180:2 181:12 182:1 183:9 187:1 196:13 202:1 203:2 210:7,8,20 216:17,21 219:14 puts 65:7 77:16 99:5 putting 77:20,22 78:7 114:4,13 123:19 144:2 181:19	156:5,11 157:7 221:3,13 queried 182:2 queries 208:6 query 208:5 217:25 question 15:18 61:1 64:20 74:12 108:13 110:5 112:24 114:14 115:23 132:25 135:12 136:4 157:17 158:5 163:11 193:21 201:8,21 205:22 207:4 208:21 questioning 81:5 106:10 158:5 questionnaires 51:6 questions 2:20 29:2 114:11 115:2,18 115:20 131:15,16 131:17 133:25 139:20 140:7,23 173:14 182:9 183:16,18 185:14 187:10 218:8 221:16,18,19 222:4,18,24 quick 20:15 58:12 quickly 105:11 113:13 174:13 quite 1:22 7:21 12:15 13:14 26:1 35:25 36:16 40:18 60:9 64:25 72:15 72:16 75:2,25 91:25 92:17 103:6 115:1 122:6,23 130:21 131:3 145:17 158:14 164:5 167:20 177:20 190:4,20 195:20 197:7 201:16 203:6	quoted 4:6 <hr/> R <hr/> raise 14:14 38:1 71:22 96:17 110:4 114:11 128:23 134:18 154:9 164:6 165:14 184:11 208:6 raised 31:19 38:17 53:25 55:14 64:6 96:24,24 106:23 108:17 123:2 128:24 129:24 172:9 173:18 199:12 201:22 raises 44:19 45:15 71:16,21 98:10,15 111:5,13 184:10 raising 164:11 Ralph 11:8,22 20:18 22:17 28:1 30:20 38:10 43:19 48:2,5 52:2 53:5 62:24 63:2 81:2 81:18,21 83:19 112:15 142:15,18 159:2,15 160:15 168:21 169:2 174:13,25 175:21 176:12 178:12,22 179:16,20 189:4 193:24 200:7 203:11 ran 108:19 range 6:17 14:1 28:15 37:20 104:1 111:22 136:20 137:8 168:4,19 194:12 ranging 30:2 rape 52:13 58:11 211:9 raped 64:22 rapidly 139:2	rare 139:2 rarely 104:11 rate 215:16 rated 91:11 92:18 162:11 rates 143:4 rating 96:25 102:2 rationale 106:17 re-established 83:21 reach 69:2,4 121:2 reached 66:5 102:19,22 reacted 124:2 reactivate 221:12 read 66:13 93:1 102:5 133:16,21 141:25 152:10 173:25 reading 11:24,25 22:4 148:25 217:25 reads 15:11 ready 161:23 real 60:8,11 110:14 116:9 120:22 199:11 realised 183:25 realism 72:21 reality 204:2 really 7:10 13:14 17:20,22 26:6 30:3,10 31:20 32:3 38:15 47:22 48:4,15 56:23 58:12,13,16 59:9 59:15 61:3 62:18 63:4 67:10 71:12 71:25 80:15 81:21 85:16 88:20,23,24 90:4,12 101:13 103:14 104:15,18 108:8 109:15 114:15 120:6 122:6 123:2,21	129:6 138:18 139:10 143:1,22 143:24 144:12,15 146:5 148:24 149:3 150:8 153:11,14 154:7 154:15 155:11 156:8 157:12 158:17 159:19,25 160:4 161:13 162:10 163:17 164:2,5,6,25 165:24 167:15,20 167:23 168:3 169:24 171:15 177:20 201:9,22 201:25 205:6 208:18 209:18 216:10 217:4 reams 13:24 reason 99:3 103:20 173:3 179:16 185:1 192:6,11 202:20 213:5 reasonable 94:15 94:17 95:11,13 96:9,11 110:12 122:21 200:17 203:14 reasoning 179:4 182:12 reasons 107:23 109:16 121:14 126:16 recall 174:5,7 recap 31:15 81:6 receive 36:19 100:1 100:16 119:24 127:11 166:19 received 51:23 53:12,12 receives 207:19 receiving 8:5 recognise 159:9 164:18 185:15
<hr/> Q <hr/> QA 133:20 qualification 19:5 19:15,24 132:3,7 132:8,12,18,19 216:16 217:19 qualifications 19:9 39:2 74:19 132:1 qualify 196:5 qualitative 124:1 qualities 157:24 quality 8:1,5 9:5,11 9:18 10:10,14 21:2,2 41:11 51:11 67:14,19 69:17 70:6 81:11 82:20,22,23 83:3 83:4,14 130:15 133:3,21 155:25				

<p>recognised 19:15 62:15 134:14 169:25</p> <p>recognises 119:20</p> <p>recognising 163:1</p> <p>recognition 14:1</p> <p>recollection 5:10</p> <p>recommendation 21:22 22:19 23:11 44:24 91:15 176:24 183:8 206:1</p> <p>recommendations 81:16 83:18 157:1 175:1 203:1,4 206:12</p> <p>recommended 107:3 175:6</p> <p>recommends 22:17</p> <p>record 33:10,18 40:13 82:10 164:20 183:24 191:15</p> <p>recorded 40:15 66:14 161:17</p> <p>records 37:5,6 67:3 201:6</p> <p>recourse 121:15</p> <p>recruit 43:5 75:1 132:23</p> <p>recruitment 16:3 43:2 44:25 73:7 163:25 166:9 187:20</p> <p>red 139:12</p> <p>redacted 141:3</p> <p>redesigned 82:13</p> <p>reduce 128:17</p> <p>reduced 127:7 128:7 130:20,20 130:20</p> <p>reducing 18:18 199:1,2</p> <p>reduction 18:23 128:2</p>	<p>refer 2:9 26:25 54:7 92:14 96:14 140:10,13,20</p> <p>164:22 165:18 184:23 185:7 212:22 213:6 214:8,21</p> <p>reference 52:19 142:17 147:1,6,15 148:4 161:2 168:14</p> <p>references 43:9</p> <p>referral 56:21 62:19,23 178:1,3 213:14,17 214:3 214:19,20,23 215:2,4 216:1 218:12 219:18 220:11 221:7,8</p> <p>referrals 54:13 81:14 106:11,12 181:8 212:17,17 212:19,19 213:11 213:21,23 214:1 214:11,18 215:18 215:24 221:22,24</p> <p>referred 21:16 53:14,15,17 54:20 55:5 56:22 145:12 212:4 217:21</p> <p>referring 98:11 175:9 217:15 218:11,12 219:3</p> <p>refine 205:10,18</p> <p>reflect 10:1 39:22 40:1 47:19 77:18 120:6</p> <p>reflected 9:25 49:6 78:4 80:14,19 120:14 205:23</p> <p>reflection 79:5</p> <p>reflects 47:2</p> <p>refrain 180:15</p> <p>Reg 158:10</p> <p>regard 118:19</p>	<p>219:19</p> <p>regarding 62:12 91:13,16 176:16</p> <p>regardless 183:5</p> <p>regime 137:14,17 139:17 186:13 201:6,19 207:3,7</p> <p>regimes 8:21</p> <p>region 23:14 24:18 55:12,12 82:5 88:17</p> <p>regional 30:8 82:1 82:2,3 90:15</p> <p>regionalisation 89:20</p> <p>regions 30:12 82:2 84:7 89:18</p> <p>register 17:24 41:19,21 42:14,22 42:23 43:4,13 118:23 119:14</p> <p>registered 16:6,8,9 16:23 17:4 19:7 19:19 24:19 25:22 26:16 27:9 28:7 28:17,24 34:17,20 38:1 48:13 87:1 91:5 117:18 119:3 123:24 137:6 155:22 156:2 168:6 191:1,2,4</p> <p>registers 37:5 42:1 214:12</p> <p>registration 25:12 83:1 105:16 109:14 110:6,10 116:3 126:3,18 137:2,13,24 156:1 156:3,6 202:4,13</p> <p>Registry 209:21</p> <p>regrettably 107:21</p> <p>Regs 94:19 96:17 101:9 125:22</p> <p>regular 52:11 92:25 122:20</p>	<p>125:14 200:16 205:2,5,5,11 207:20 221:2</p> <p>regularly 120:20 173:19 194:17</p> <p>regulate 114:12</p> <p>regulated 111:7,12 193:19,21 194:15 194:16,19 195:21 196:12 197:17,21 198:1 199:14 200:1,15 202:5 203:18 205:7 206:8,21 207:21 208:2 209:13,23 210:10,13 211:15 212:7,21,21 215:21 216:2,5,14</p> <p>regulating 113:24</p> <p>regulation 4:13 19:12,25 38:4 116:14 123:6,25 124:16 157:15,16 157:20 202:14</p> <p>regulations 8:13 70:23 95:6</p> <p>regulator 114:1,1</p> <p>regulators 103:24</p> <p>regulatory 30:9 37:2 66:20 111:25 113:14 114:3,8,17 131:22 132:6,11 139:9,17 152:21 214:16</p> <p>Rehabilitation 187:20,24 189:24</p> <p>reinstatement 101:17</p> <p>reinstating 100:14</p> <p>reintroduce 101:21</p> <p>reintroduced 101:16</p> <p>relate 23:4</p> <p>related 13:7 77:14</p>	<p>191:25</p> <p>relating 172:15</p> <p>relation 63:12 66:11 104:2 159:14 169:6 172:17,17 173:14 173:15 178:15 182:9 195:9</p> <p>relationship 27:14 40:22 41:13 124:3 155:10,18 163:13 167:13 192:19,20 192:21 198:12</p> <p>relationships 126:16 159:12 160:9 166:22 167:11,16,19 171:2</p> <p>relative 119:2 123:19</p> <p>relatively 10:7 25:23,25 88:10 187:11</p> <p>relevant 2:21 43:16 83:11 100:1 112:16 132:19 138:3 188:13 194:21 213:8 215:6,6,20 216:10</p> <p>reliant 65:3</p> <p>relief 108:13</p> <p>relies 9:11 96:9 203:19</p> <p>reluctance 111:24</p> <p>rely 94:14</p> <p>relying 127:23 162:3 213:10</p> <p>remain 10:19</p> <p>remains 113:19</p> <p>remarks 131:2</p> <p>remediate 163:2</p> <p>remedies 104:1,2</p> <p>remedy 7:19 9:19 96:14,16</p> <p>remember 1:20</p>
---	---	---	---	--

43:11 91:4 103:25 104:9 141:3 201:16 remind 33:25 34:3 115:8 remit 28:2 83:10 remits 4:13,14 89:21 removal 104:3 remove 202:23 218:22 removed 105:8 134:11 199:15 212:5 218:24 repealed 32:15 repeat 5:5 repeated 146:8 replace 123:3 replaced 32:16,17 reply 217:17,22 218:11 report 9:17 21:10 21:20 49:7 51:5 51:12 66:9 74:4 75:24 81:17,20 91:22 93:1,22 102:5 111:21 125:18 129:13,20 129:20 131:7 134:3 137:19 148:25 152:20 157:12 165:6,21 166:3 173:25 174:1,3,23 175:24 reported 54:5 63:22 92:1,7 100:10 101:15 102:8 121:13 196:24 reporting 10:4 91:14,20 92:9 101:17 108:6 154:12 165:8,21 165:23,24 178:7 reports 21:14 34:21	71:13 82:25 83:3 83:14 84:14 133:15,21 152:5 197:1 represent 147:10 representation 109:5 211:21 representations 182:13,16,19,23 182:24 183:11 211:12,18,19,24 212:13 217:12,13 217:14,16,25 218:21 representative 99:19 representatives 79:16 represented 97:19 213:8 represents 169:21 reputation 10:7 request 174:17 178:16 requested 63:3,6 requests 208:3 require 39:1 111:25 122:13 137:12 148:9 required 10:5 15:3 25:10 29:6 30:11 73:3 83:2 155:23 requirement 17:23 19:5 73:6,23 96:17 121:5 129:13 194:15 195:8,10 requirements 11:12 12:8 154:21 178:7 195:7 220:5 requires 10:25 research 21:8 33:17 46:5 89:24 122:6 131:6 residence 102:16	resident 178:19 residential 6:22 7:3 8:9,15,18 13:12 14:22 16:16 17:3 17:6,18,23 18:5,7 18:10,12,18 19:6 19:11,20 20:4,9 21:3,13,17 22:25 23:24 26:13 32:21 32:22 33:8 34:23 35:1,18 39:7,10 41:7 47:24 48:9 50:22 88:11,14 91:5 96:2,11 122:1 123:4 125:3 125:10,15 131:23 132:8,20,24 136:4 143:9 156:4 159:22 resigned 198:9,11 198:14 212:6 resolve 47:1 resort 145:18 resource 123:20 128:20 143:12 147:23 171:4,6 resources 123:15 169:13,14,17,19 respect 5:15,16 11:5,16 12:3 20:13 31:22 32:6 129:10 157:2 175:1 180:14,16 187:19 191:23 193:25 194:1,2 195:23 203:2 respectful 184:9 respecting 204:23 respects 116:12 respond 66:24 131:1 164:19 responded 124:2 response 20:16 62:23 64:3 69:14 responsibilities	19:9 72:11,12,12 73:16 90:6,11 116:6 126:10 135:3 186:11 200:23 201:20 responsibility 4:12 5:1 62:1 72:16 73:15 79:15 80:9 152:19,20,23 200:22 204:17,24 responsible 4:23 47:11 81:14 150:23 156:13 187:19 202:22 206:24 restrain 95:4,11,16 restraint 91:14,16 92:25 93:18 94:12 95:23 96:4,13,15 100:5 restrict 85:13,14 restricted 22:13 122:22 restrictions 144:24 restructured 81:23 restructuring 86:21 result 27:16 54:10 80:21 85:6 106:2 180:9 181:13 207:11 resulted 52:17 178:25 196:25 results 78:3 retired 80:7 retrospective 136:24 137:21 return 35:9 115:6 172:1 reverted 50:6 review 18:22 20:14 20:19 21:1,7,9 27:16 28:4 29:12 29:14 31:9 32:1 48:20,21 54:11	80:23 81:20 133:12 137:16 201:5 202:15 203:1,4 206:20 207:10 211:12 219:8,12 220:6,10 220:25 221:11 reviewed 84:14,18 reviewing 21:2,14 21:15 reviews 82:25 135:11 153:14 156:22 202:16 revisited 156:24 Richards 47:19 right 4:11 5:10 6:11 7:4,16,24 8:22 9:21 10:25 14:13 15:16 18:25 20:12 21:4,5,6,13 21:25 24:20 29:4 29:5,16,19 32:13 34:9,25 42:5 43:12 44:9 47:23 49:5,16,19 50:15 51:23 53:23 55:23 58:16 59:11 60:25 61:13,16,17,24 62:9 64:20 65:16 66:18 67:1 68:12 70:8 72:2 77:19 79:8 80:20 83:17 84:2 92:19,20 98:9,19 101:18 102:23 105:14 106:21 114:12 119:4 122:5 127:9 132:9 134:20 136:25 139:16 141:15,19 145:6 150:7,24 151:6 152:1,17,24 153:3 153:23 154:24,25 158:20 159:17 160:1 162:24
---	--	---	---	--

163:16 165:12,13 165:16 166:8,17 168:16 171:8,12 171:13 172:20 173:11,12 174:2,6 174:12,14,24 175:12 176:9,20 177:3,22 178:5 182:15 183:14,24 186:9,15 187:2,8 187:21 188:6,14 189:3 192:8 193:16 195:7,12 197:5 198:21 199:22 200:6,13 206:9 207:5 211:12,13,16 212:10,13 213:7 213:10 215:8,12 216:18 217:11 218:5,9,11,14 219:6,7 220:9,12 220:24 221:1,6 right-hand 1:14 rightly 124:14 rights 207:7 rigorous 6:13 95:25 rigour 131:13 ring 114:13 ringing 54:22 rings 169:25 risk 67:4 71:2 91:19,23 94:5,10 95:17,18,19 100:17 101:2,13 105:9,12 209:10 209:22 212:8 213:9 214:25 215:7 risks 130:23 risky 126:18 216:11 robust 41:11 66:1 112:11 robust-enough	137:17 role 4:4 13:5 24:6 24:24 47:9,9 62:7 63:16 76:18 134:10 135:24 152:12 153:11 156:12 184:4 188:18,19 189:19 194:13 195:15 roles 138:16 171:22 207:22 roll 144:22 room 27:24 170:2,5 170:8,9,12,23 rooted 81:11 roughly 83:24 216:20 round 2:6 route 54:17 routes 132:17 routine 26:12 77:1 77:9 routines 148:9 row 43:17,20,24 Royal 5:18 140:1 141:17,18 142:5 142:19 143:15,23 156:2 165:11 168:4 172:9 175:3 177:16 180:5 Rs 163:22 164:11 164:17 165:4 RS-A201 174:17 RS-F2 140:21 RS-F3 174:16,20 175:2,7,15 176:11 177:1,14 178:15 179:13 180:18 181:10,13 182:14 182:25 rule 208:12 rules 192:24 204:3 run 19:3 38:15 109:5 191:11 runaway 102:11	running 2:8 4:17 107:1,25 109:16 111:10 runs 111:17 141:16 141:18 <hr/> S <hr/> sad 160:13,14 161:16 safe 10:22 13:7,10 13:13 44:25 69:8 84:16 96:20 145:1 145:2 160:18 161:16 163:25 166:9 196:21 197:4 201:12,24 safeguard 150:13 safeguarding 5:2 11:22 12:13 31:18 38:21 57:4,6,10 57:11 58:22 59:4 59:5 63:18 65:19 66:1,23 67:3 68:20 69:15 71:12 73:3,12 77:12 78:5 80:9,11 81:10 83:20 84:1 101:25 102:1 106:14 116:12 120:9 142:8,10 150:16 152:5,9,12 152:13,16,18,19 152:23,25 153:2,3 153:3,8,10,12,13 153:16,19,21,22 154:6,15,17,18 155:3,7,9 156:22 159:20 163:19,20 164:2 165:18 166:18,18 173:2 186:25 187:6 196:14,19 197:3 200:4,22 201:1 202:2 204:17,20 204:24 220:21	safeguards 95:10 safely 105:12 safer 73:7 187:20 202:17 safety 11:17 16:2 165:19 203:24 sample 221:5 sanctions 137:19 satisfactory 129:22 133:11 satisfied 161:12 177:14 satisfy 200:2 saw 41:20 126:13 saying 11:14 15:20 29:13 51:1 52:5 55:4,5 56:25 57:2 63:4 64:16 93:25 101:24 148:11 165:15 168:2 177:1 180:13 181:20 says 9:18 19:23 22:2,19 24:4 28:14 40:3 43:22 48:18 58:6 65:23 69:7 118:18 121:23 139:13 147:24 151:9 176:13 179:19 180:4,23 200:14 203:6,12 205:1 207:11 208:20 scale 201:7 scaled 201:23 scales 52:8,9 scaling 202:8 scattergun 54:18 schedule 13:2 123:12 scheme 179:23 188:1,5,7 202:4,7 school 5:1,15,17,18 5:22 6:3,3 7:2,3 7:17,20 8:4,9,10	8:15,19 10:25 13:3,12 14:23,23 15:2,23,24 16:1,6 16:6,8,17,21,21 16:25,25 17:6,13 17:14,23 19:7,21 21:3,17 22:24 23:15,17,19 24:3 26:13 28:13,19,25 28:25 31:14,15,16 31:22 32:6,8,12 32:19,19,21,23,24 33:4,5,8,11,21,22 33:23 34:2,3,11 34:13,13,14,15,17 34:17,18,22,23 35:1,15,17,18 36:5,8,12,18,24 37:11,24,24 38:23 39:18 40:5 41:14 42:7 47:9 48:9,12 48:13 49:4 50:2 51:1 52:17 53:2,8 54:3,23 55:4 59:10,20 62:3 63:21,25 64:3,4,7 65:1 66:4,4 67:25 68:5,5,16 71:21 72:23 73:13 74:7 74:15 75:19,23 76:1,5 77:5,13,16 78:9 79:14 80:1 80:14 84:14 85:4 91:1,5 93:3,3,5,7 94:13,22,23 96:12 96:22,25 97:5,7 97:16,17 99:2 100:4 103:2 105:15 107:1,7 108:1,19 109:11 109:16,18,20,21 109:23 110:6,17 110:22 111:10 112:1,3 113:17,19 119:7 120:21
--	---	---	---	---

121:2,14,15,22	23:17,24,24 24:17	12:6,20 13:9 14:3	86:10 87:13,17,21	208:10,21,25
122:1 123:23	25:11 26:8 28:6,7	14:20 15:5,16	88:2,8,10,20,23	209:3,7,15,24
124:6,8,9,12	29:9,24 31:6,12	16:5 17:2,7,10,12	90:13,20,25 91:7	210:6,12,15,23
125:11,15 126:4	33:12 36:8,10	17:15,21 18:3,21	92:16,23 93:6,21	211:4,16,24 212:1
126:21 128:7,7	37:5,6,7 38:19,25	19:1 20:1,12	94:3,21 95:2,7,17	212:10,12,16,23
135:14 137:1,5,10	39:6,7,10,16 41:8	21:19 22:2,15	95:19,23 96:2,21	212:25 213:10,13
137:18,22 139:14	41:17 42:4 46:8	24:4,17,20 25:12	97:12 98:1,3,9,15	213:16,19 214:4
140:1 141:19	46:10,24 47:25	25:23 26:8,17	98:20 99:12,21	214:14,19 215:1,9
142:5,9,19,20	50:22,23 60:14	27:8,16 28:19,23	100:3,13 101:4,8	215:12,14,22
143:15,23 144:3,4	61:4,19 67:21	29:13,21 30:2,17	101:11,13,20	216:1,9,18 217:5
145:4,13 146:8,13	71:19,24 72:18	30:24 31:11,18	102:10,18,23	218:3,6,10,15
146:14,24 147:9	73:2,5 74:21	32:14,25 33:3,7	103:13 104:8,17	219:3,7,22 220:6
147:10,13 148:13	77:25 78:2 79:7	33:22,24 34:19	104:25 105:14	220:9,13,24
149:9 151:7,14	79:23 80:8 83:10	35:2,7,13,18,21	106:18,23 107:12	221:15 222:6,17
156:2,3,6,19	84:24 85:22 92:14	36:23 37:14,20	107:17,20 108:17	222:23
157:11 158:13	94:13,15 95:7,10	38:7 39:9,14,18	109:10 110:4,21	scope 110:15
159:14,17,18,21	95:23 96:3 98:16	40:3,10,17,20	111:5,13 112:6,10	Scorer 129:1,9
160:12,21 165:11	98:20,21 100:11	41:3,16 42:9,20	113:1 114:5,11,24	screen 2:17 11:20
168:4 169:18	100:21 107:3,6	42:25 43:10,15,19	115:7,12,16,17	11:25 20:22 27:22
172:10 173:1	108:6,7,25 109:8	44:4,18 45:5,10	116:13,19 117:18	140:15 148:1,2
175:3 177:16	109:9,14 110:11	45:13 46:16,19,22	118:20 119:11,20	185:6,8
180:5 191:24	111:6,22 112:4,7	47:15,19 48:2,15	120:5,25 121:3,20	scrutinise 79:17
193:13 194:14	113:7,14 114:2,10	48:17 49:8,13,25	122:12 123:1,21	scrutinised 47:17
195:4,9 196:17	116:6,21 117:25	50:5,8,17,25	125:2,21,23	131:4
197:16,23 198:13	118:1 120:6,10,23	51:12,18,23 52:25	126:22 127:9	scrutiny 110:16
198:19 201:10,15	121:10 123:5,22	53:15,20,23 54:9	128:1,5,8,18,23	130:24 131:9
201:17,24 204:8	125:3,3,7,24	54:25 55:3,15,23	130:13,23 131:15	154:23
213:1 214:8	126:10 128:24	56:1,21 57:17,22	135:22 139:21,23	Seashell 139:25
216:12 219:22	129:6,11,14	58:4,10,23 59:8	183:22,23 184:17	141:12,16 144:18
school's 37:9 52:6	131:23 136:5	59:12,16,24 60:10	184:18 186:4,7,11	150:10,14 152:12
173:20	137:15,19 139:12	60:22,25 61:13,16	186:15,19,21,24	153:1,3 154:7
school-led 134:8	139:13 143:9,12	61:21 62:6,10,15	187:5,9,23 188:5	155:3 165:24
school-related	143:13 144:16	62:21 64:1,11,15	188:7,14,25 189:4	167:15
114:8	149:10 165:1	65:6,10,16 66:17	189:14,22 190:3,9	second 2:6 6:20
school-specific	169:16 192:3	66:19 67:11 68:3	190:16,20 191:6,9	44:4,5 59:18
30:19,21	194:13 197:15,19	68:12 69:17,22	191:17,20 192:18	78:11 89:23 100:3
schools 4:4,9,14,17	Schools' 31:7	70:8,20 71:2,10	193:7,11,17 194:4	126:23 142:18
4:23,25 5:14,20	science 149:13	72:3,23 73:5,20	194:24 195:4,12	secondary 149:17
6:1,22,22 7:8 8:11	scientific 149:19	74:1,18 75:15	195:18 197:5	secondly 2:12 9:12
10:13 11:4,6 13:6	Scolding 1:4,5 2:3	76:4,11,14,18	198:5,7 199:2,9	67:16 70:20 85:17
13:16,25 14:2,9	2:4 3:7,9,13,16,25	77:7 78:16,18	200:6,13,19 201:4	98:20 122:1
15:6 16:16 17:3	4:3,11,16 5:3,12	79:25 80:10,20	201:14 202:12,19	140:16 184:24
17:18 18:5,7,9,11	6:13 7:4,24 8:6,22	81:1 82:6,9,16,20	203:5,22 204:25	195:15
18:12,18 19:11	9:3,21,24 10:12	83:17,24 84:10,17	205:10,20,22	section 59:1,19
20:3,4,5,10 21:13	10:20 11:3,20	84:22 85:16 86:6	206:3,22 207:2,15	63:17 93:1

<p>sector 8:9,10 10:4 10:12,16 13:12 17:10,11 18:22 19:11 20:10 26:13 39:6 40:18 73:9 73:11 74:20,21 79:3 109:11,12 120:2 121:12,25 122:2 128:6 132:15 187:6 202:19 214:15</p> <p>sector-specific 208:8</p> <p>sectors 208:9</p> <p>secure 27:15 84:10 145:20 149:3</p> <p>see 1:18 13:4 20:21 21:8,8 30:17 38:20 44:6 49:2 68:23 73:17 75:13 84:15,25 109:15 110:14 114:7 118:4 126:9 133:14,23 150:8 163:5 168:10 170:2 174:14 175:11,24 176:1 176:11 177:17 180:12,20 192:8</p> <p>seeing 41:23 71:5 71:20 90:12 109:13 110:12 160:1</p> <p>seek 151:17</p> <p>seeking 52:18</p> <p>seen 12:10,13,17 46:22 47:13 62:3 71:17 99:17 102:25 107:21 109:20 133:19,20 136:15 137:5 164:20 170:17 182:19,21 197:2</p> <p>sees 204:25</p> <p>select 41:12 112:21</p>	<p>112:23</p> <p>selection 16:3 44:25</p> <p>self 159:11 191:6</p> <p>self-employed 192:4,6</p> <p>self-esteem 68:17</p> <p>self-harming 144:11 149:25</p> <p>self-worth 159:12</p> <p>SEN 80:2,8</p> <p>send 58:15 112:13 218:21</p> <p>senior 55:11 77:24 89:20 90:16</p> <p>sense 16:14 69:3 79:14 94:21 142:9 142:24 145:7 146:16 149:5 154:16 159:9 162:12 169:15 201:7,8 202:24,25 214:1</p> <p>sensible 14:11 17:15 49:17 54:1 202:8 205:10</p> <p>sent 15:19 52:4 57:22 62:22</p> <p>sentences 49:14 159:21 190:14</p> <p>separate 22:25 24:23 134:5 153:10 202:6</p> <p>separated 6:21</p> <p>separately 60:6,6 99:21 175:23</p> <p>September 3:18,19 3:19 141:14 144:22 167:15</p> <p>series 83:18 152:3 159:13</p> <p>serious 31:18 32:1 55:1 58:14 61:7 64:25 69:25 77:17 92:17 98:22 100:3</p>	<p>100:9 101:4 104:1 190:5,9 193:3 211:8</p> <p>seriously 52:5 56:6 200:23 206:11</p> <p>serve 103:7</p> <p>served 103:6,20</p> <p>service 96:19 122:14 126:25 187:1 188:3 191:10 197:8 206:17 207:17 214:2,24</p> <p>services 4:8,18 53:18,18,22 54:5 54:6 55:6 58:18 58:21 99:22 106:12 114:18 132:16 183:6,6 208:3</p> <p>serving 103:13</p> <p>session 113:3 170:18,21 171:14</p> <p>set 13:1 16:15 23:2 30:3 37:5 55:1 57:15 69:23 81:17 86:25 97:11 101:18 129:4 142:23,25 178:4 179:4 187:2 189:1 191:9,11 192:16 215:3</p> <p>sets 6:23 9:22 11:11 12:1,6 15:23,25 16:10 52:14 189:25 200:9 203:9</p> <p>setting 8:17 30:10 34:8 41:5 49:18 88:14 100:5 125:12,13 204:8</p> <p>settings 10:18,18 24:8,22 26:3 27:15 29:15 75:6 88:11 95:2</p>	<p>settle 89:13</p> <p>seven 43:19 156:5</p> <p>severe 144:10 160:25</p> <p>severely 144:12</p> <p>sex 166:22 167:11 167:14,20 171:1 173:10 190:6</p> <p>sexting 213:2,3</p> <p>sexual 32:6 52:15 52:16 64:25 138:15 160:9 167:3,16 190:11 196:7 198:11</p> <p>sexualised 171:2</p> <p>sexuality 171:12</p> <p>sexually 52:10 167:5 174:21</p> <p>shadow 21:17 47:3</p> <p>share 13:22 22:11 25:1 107:5 209:19</p> <p>shared 81:13</p> <p>sharing 24:25 81:12 85:18,19 98:24 130:2 214:6</p> <p>Sharpling 138:9,10 139:19 183:25 184:1,6 221:20,21 222:1,3</p> <p>shift 36:22 89:16 103:11</p> <p>short 9:19 35:7,11 172:3</p> <p>short-break 8:17 125:12,13</p> <p>shortcut 182:11</p> <p>shorter 103:22 127:15</p> <p>shortest 95:22</p> <p>shortly 62:10 105:16</p> <p>show 41:24 50:10 76:20 106:13,15 109:6 162:9 191:14 192:10</p>	<p>193:2</p> <p>showered 178:16</p> <p>showering 173:19 177:8 178:17 179:2 181:3</p> <p>showers 173:20</p> <p>showing 43:4 56:8 174:9</p> <p>shows 139:15</p> <p>shut 85:11</p> <p>side 16:12,13 47:21 47:21 170:20</p> <p>sides 47:11,14</p> <p>sigh 108:12</p> <p>sight 134:14</p> <p>sign 148:6 161:3 169:11 186:19</p> <p>sign-off 83:8,12</p> <p>signal 62:4</p> <p>signature 141:2</p> <p>signed 3:7,10,22 186:1</p> <p>significant 18:23 23:23 24:5,8 27:11 51:14 63:10 71:13 75:17 91:17 103:7 111:22 119:21 120:1,21 121:9 122:23 124:13 125:7 126:24 128:2,20 134:18 196:1 199:3 201:14 202:16 215:9</p> <p>significantly 109:1 114:25</p> <p>signing 141:3 147:5 148:4 160:17 161:24</p> <p>signs 162:9 164:18 169:12</p> <p>similar 13:4 17:19 19:21 55:19 71:20 118:1 164:24</p> <p>simple 158:5</p>
---	--	--	---	--

159:21 160:14,17 187:11 217:4 simplification 209:1 simplified 208:22 simplifying 208:17 simply 10:4,9 64:18 123:11 135:24 145:15 152:22 200:14 202:23 singing 82:9 single 41:21 42:1 42:14,22,23 43:4 43:12 204:13,13 Singleton 202:15 sings 27:23 28:11 Sir 80:22 sit 50:17 59:8 104:18 sites 23:18 142:21 sits 15:10 134:15 134:16 155:8 sitting 114:18 situation 38:4 46:7 49:21 55:19 63:19 69:6 78:10 87:17 118:25 136:17 177:11 194:5 200:5 situations 16:20 25:15 49:22 103:14 119:6 198:8 204:2 six 16:24,24 43:19 70:13 75:22 76:7 103:21 size 6:18 23:15 24:3 skill 23:2,7 skills 4:8 29:6,23 30:5,10 37:15 89:9 146:1 150:2 198:1 skin 61:4 skirted 67:10 Slater 129:1	slightly 12:1 72:4 78:13 79:1 81:19 103:8 107:11 115:4 122:16 129:25 139:11 192:3 204:2 205:11 208:11 215:3 slimmed-down 6:21,25 slimmer 7:4 slipped 86:12 110:18 slow 143:25 small 10:7 16:23 17:5 18:17 20:2,2 23:23 24:15 25:25 40:18 41:14 46:8 75:2,9 87:6 88:6 89:8 124:7,7,15 129:18 148:13,21 150:5 166:3 170:9 170:14 smaller 46:15 Smith 184:16,18 185:23 186:15,18 186:20,23,24 187:4,8,13 206:23 207:1,8,24 208:17 208:23 209:1,6,14 209:18 210:2,11 210:14,17,25 211:14,21,25 212:9,11,15,20,24 213:7,12,15,18 214:1,10,15,23 215:8,11,13,16,25 216:8,14,23 217:20 218:5,9,14 218:16 219:6,15 220:2,8,12,20 221:3,16,21,24 222:2,22 smooth 170:22 sociable 171:21	social 4:15 8:25 9:4 12:10,25 15:22 18:19 27:11 28:2 37:16 41:4 55:6 58:18 81:23 82:2 82:23,24 84:2 89:7 90:17 93:8 98:8 103:10 117:19 124:17,23 127:11 131:19,20 131:22,25 132:2,2 132:6,7,11,12,18 134:9 150:2 187:18 206:16 socially 160:6 171:10 Society 74:6 soft 188:12,16 189:16 sole 197:4 solicitors 188:22 solution 114:5 solve 73:24 somebody 19:5 43:24 58:11 64:21 64:23 70:6 73:17 80:1,3 92:1 95:19 106:19 110:23 119:19 160:13 163:9 196:17 197:16 198:8,12 198:24 208:15 209:8 211:4 213:1 214:3,24 215:5 216:2 218:19 219:4 220:10,17 someone's 191:25 220:6 somewhat 35:14 96:21 133:1 199:4 son 178:18 soon 64:19 164:19 sorry 11:8 22:6 32:25 55:25 98:3 107:10 156:10	168:8 176:2 179:20,20 185:24 sort 11:11 12:13 14:23 20:1 26:14 30:2 32:8 37:2 50:19 55:16 56:4 56:8 59:12 60:4 60:16 65:6 66:19 71:25 73:13 76:7 77:17 78:8 79:4,6 80:2,17,17 81:5 84:8,19 88:19 92:9 103:10 105:19 106:7 107:25 108:21 110:10 114:2 119:8 121:5,7 122:14 143:22 147:4,24 148:7 150:2 152:8 154:1 154:6,11 156:1 158:12 162:14 163:7,12 164:8 166:5 169:21 170:22 171:8,14 173:1 179:19 196:8 215:24 218:6 220:24,25 sorts 16:3 26:3 34:8 39:3 43:11 51:8 67:17 69:19 71:5 71:24 78:25 79:9 79:10 81:14 96:3 103:14 105:23 111:17 188:14 205:13 211:10 sought 52:17 219:12 sounded 34:13 sounds 66:3 162:13 165:10 source 100:17,20 sources 72:5 155:1 south 117:25 south-east 20:8	Southlands 123:23 space 73:14 161:22 168:1,2 170:5 spaces 160:7 speak 2:6 5:13 8:1 31:24 48:22 55:16 65:2 109:2 112:13 157:9 160:10 192:5,24 193:17 220:25 speakers 31:7 speaking 41:14 208:24 special 5:13 6:1,3 6:22 7:3 8:8,10,15 8:18 13:12,19 14:2,23 16:6,8,16 16:21 17:3,6,18 17:23 18:5,7,10 18:12,18 19:6,11 19:21 20:4,9 21:3 21:13,17 23:24 24:17 26:13 28:24 28:25 31:6,21 32:12,18,21,22,23 33:4,8,22,23 34:23 35:1,18 37:6 38:25 39:7 39:10,18,21 41:8 47:25 48:9,13 50:23 51:25 74:20 74:21 78:22 79:7 80:1 85:4 91:5 96:3,12 108:25 109:9,11 120:21 122:1 123:4 124:8 125:3,11,15 131:23 136:5 143:11 144:16 145:13 156:3 169:16 specialism 29:11 166:9 specialist 32:25 33:4 39:2 87:5
---	--	---	--	--

137:10 143:8 149:1 150:7 specific 19:5 28:16 30:13 31:11 34:5 38:24 56:16 60:4 67:25 69:16 74:18 87:5 135:11,15 144:14 167:7 172:7 188:19 specifically 5:13 29:2 38:22 159:22 173:19 197:19 specificity 14:7 specified 199:16 specify 28:8 spectrum 18:17 36:16 117:13,13 speech 26:10 158:2 Spencer 169:20 spend 77:23 116:9 spent 23:6 190:5,7 190:11,15,18 192:8 Spielman 1:7,10 2:1 3:16,24 4:2,3 4:6,12,19 5:11,23 8:22,24 9:6 10:3 11:19,20,24 14:3 14:5 27:3 37:3,4 39:13,24 47:1,2 47:16 55:24,25 56:2 69:20,21 71:23 72:2,4 73:1 73:10,25 77:7,8 78:17 79:11,12 80:13,22,25 83:23 83:25 89:19 97:9 97:13 98:13,23 99:17,25 100:12 100:15 101:17 103:23 104:10,13 107:5,13,18,21 109:7,13 110:8,22 111:14,19 112:9 112:22 113:20	114:7,16 115:2,11 115:21 116:4,16 116:20 118:3 120:4,8 121:1,12 122:4,17 123:10 124:5 126:8,24 127:6,10 128:4,6 128:9,22 129:12 130:17,19 131:3 131:18,20 134:3 134:13 135:7,12 135:15,18 136:8 136:13,14 137:3 137:14 138:1,5,10 138:13,17 222:15 spirit 119:15 split 29:24 spoken 28:11 spot 108:14 SST000035 176:11 SST000042_007 174:14 SST000062 175:21 SST000083_001 142:16 SST000083_008 159:3 SST000084 168:12 168:13 SST000085_001 164:12 SST000086 159:15 SST000087 160:15 St 213:22 staff 6:18 36:19 42:4,7,15 43:5,6,7 45:20,21 47:8 51:14,19 58:7 66:1 68:15,25 71:10 74:8,19 75:5,8,10,22 94:16,17 95:1,2 102:14 132:14,21 137:11 138:24 140:20 142:14	151:15 154:13 157:10 160:2 162:4 163:8,15,25 164:9,14,25 165:2 165:13 166:3,6 172:9,13,23 173:16,17 194:14 staffing 36:19 75:19 stage 58:16 74:6 91:18 105:18 126:8 211:3 216:24 217:16 stakeholder 207:25 Stanbridge 5:15 28:20 31:14 32:22 33:16 34:4 36:3,9 44:19 48:11 56:4 56:14 90:14 133:4 stand 73:17 154:10 standard 7:20 9:5 9:12,13,16 10:21 10:24 11:2 15:2,4 19:23,24 33:13 50:2 58:8 135:25 188:19,22 190:16 standards 6:4,5,7,7 6:9 7:2,3,6,7,8,10 7:12,19,25 9:2 10:14,21 11:13 14:22 17:25 22:14 33:9,14,15,21,22 33:23 34:22,24 35:17,19 38:23,24 39:19 48:12 72:10 82:24 83:3 86:12 87:24 91:13 93:22 120:5,6,14 121:4 121:22 156:5,7,11 157:7 standing 131:5 192:24 stands 123:10 start 26:23 43:4,25 69:21 83:5 139:10	140:1,6 143:7 163:24 started 49:1 74:16 143:9 172:24 starting 9:23 36:15 75:21 107:10 state 73:1,9,11,20 79:19 129:22 statement 1:13,21 2:11 3:9,11 5:7 20:20 28:18 38:5 51:4 53:9 66:10 69:7 81:18 93:22 104:9 111:15 112:17 126:23 140:11,19,25 141:4 142:16,23 150:15 152:11 155:5 159:2 165:10 172:13,17 173:15 179:12 185:5 186:1,2,19 189:1 193:23 201:4 206:6 207:18 statements 1:10,11 3:2,4,16,23 141:9 184:22 statistics 143:17 statute 187:25 200:10 205:14,23 statutory 4:4 11:1 91:13 129:12 134:3 203:7 205:3 stay 84:8 183:17 stepped 76:3 stepping 135:3 steps 31:10 54:3 158:23 sterner 110:19 stiffening 110:14 Stockport 155:17 155:18 173:5,6 stolen 53:7 Stony 5:17	stop 52:11 55:15 184:25 stops 218:18 straight 166:20 171:15 straightforward 195:13 strand 139:8,9 140:1 strands 138:19 strategy 112:22 134:4 175:17,23 176:8 strengthen 82:22 strengths 47:13 strike 207:8 strikes 207:5 strong 70:3 132:24 176:24 183:7 stronger 81:23 strongest 72:14 structure 82:1,3 150:13,18,20 155:2 187:13 Structured 216:19 216:23 structures 47:11 89:14 131:10 142:9 154:17 struggle 14:6 student 146:22 158:13 169:8 170:15 students 20:2 120:1 122:13 144:7,23 145:1,3,6,7,14 160:18,24 169:4 170:14 students' 157:11 study 131:7 studying 4:20 stuff 117:6 subadvisory 152:4 subject 8:20 92:24 93:18 96:22
---	---	---	---	---

113:14 117:17 125:13,15 126:4 128:1 199:17,19 201:18 204:6 207:7 subjected 64:22 submission 184:9 submitted 66:8 subscribe 13:23 subsequently 133:23 substandard 218:7 substantial 126:9 130:21 131:5 substantially 127:12 substantiated 181:5 successful 108:7 191:11 218:23 suddenly 46:25 50:9 suffering 162:20 sufficient 10:5 14:7 51:13 124:21 199:25 sufficiently 181:5 suggest 136:15 205:3 suggesting 99:19 suggestions 123:2 suggestive 213:3 suggests 204:6 suitable 175:18 177:1 201:3 summarise 7:24 142:19 summarises 113:20 summer 76:5 Sunita 203:1,4 supermarket 161:12 supervise 126:11 supervised 170:12 199:16 203:17	supervising 194:9 supervision 57:3 58:8 124:21 199:17,18,25 200:3,9,10,14,15 200:16 201:2 203:5,7,10 204:5 204:9 205:1,4,5,5 205:12 206:8 supervisors 133:16 supervisory 214:12 supplied 199:10 supply 10:12 16:2 96:10 supplying 211:23 support 11:13 70:7 134:1 137:11 158:16 170:10,11 170:16 183:7 supported 148:6 suppose 53:25 61:1 64:20 67:11 114:14 123:21 157:17 171:18 177:5 192:20 193:21 201:8,21 205:22 208:21 218:3 supposed 16:1 140:9 sure 1:16,20 15:17 26:20 29:5 40:14 46:4 47:18 59:9 72:24 79:21 84:8 96:6 99:25 101:7 101:18 106:21 119:5 122:24 124:17,19,24 130:6 134:24 135:22 138:20,23 165:9 204:19 Surely 58:16 surface 36:1 84:5 139:1,7 surfaced 118:3,5	surprising 78:24 survival 143:4 survive 36:9,13 SUSAN 184:15 222:21 suspect 36:6,12 114:25 suspected 213:2 suspend 96:19 104:21 105:16 suspension 85:13 104:2,22 sustaining 109:23 SUZANNE 184:16 222:22 swear 183:23 sworn 2:1,2 140:3 184:15,16 222:15 222:16,19,21,22 symbol 148:1 symbols 148:7 159:20 system 11:9 26:18 41:4 42:9 44:14 44:15 55:19 72:15 82:6,8 83:4 86:11 98:24 99:10 101:16 116:3 133:3 134:8 138:12 147:1 162:1 165:7 166:1 166:4 190:4 systemic 47:10 56:11 61:3 systems 55:15 56:9 66:1 67:14 72:24 81:8 82:6 124:19 138:24 148:8 204:14	table 29:24 38:11 38:21 tablets 121:11 tabs 3:20 tailored 145:24 take 11:16,17 27:18 28:3 31:3,13 41:21 43:10 46:20 48:17 61:12 62:4 69:1 81:3 82:17 84:4 100:8 103:15 104:22 106:16 111:24 115:3 135:23 145:8 158:23 191:25 200:22 203:13 221:4 taken 23:14 49:5 54:3 56:5 58:20 64:12 66:13 67:9 74:3,7,7 80:16 90:8 101:10 114:9 132:18 142:14 166:11 197:21 204:1 takes 16:22 191:24 208:3 talk 5:7 17:8 25:13 68:15,15,15 72:18 75:10 92:12 94:25 115:9 125:1 138:22 149:22 159:4,13 160:2 165:5 166:10 175:22 199:18 209:10 talked 78:20 125:9 134:20 155:2 192:2 talking 40:18 60:6 78:5,8 124:23 147:18,21,23 149:5 159:25 160:17,19 198:8 202:8 220:14	talks 96:8 target 55:20 task 27:24 28:2,5 30:25 31:1,2,9 194:24 tasks 31:1 68:13 taught 97:10,11 146:8 tea 158:7 teach 126:4 147:8 teacher 53:8 63:23 66:11,13,17 73:7 75:7 76:2 163:9 169:23,24 170:3 180:6 teachers 80:8 94:16 109:24 126:3,3,17 Teachers' 214:16 teaches 171:4 teaching 42:11 66:20 110:25 111:9 145:24 170:4 194:8,25 197:13 216:16 217:18 team 4:21 23:21 27:1 60:2 70:3,6 77:2,3 104:14 131:6 133:21 151:25,25 156:25 teams 61:24 77:25 84:7 131:5 teasing 60:8,11,16 60:19 technical 133:25 171:9 technically 198:7 technique 163:12 technologies 148:7 technology 120:16 122:21 147:24 teenage 169:13 telephone 121:19 180:22 tell 1:20 8:3 9:3
T				
		tab 1:9,18 3:2,2 141:1,10 185:20 185:22,22,22,23 186:16		

28:5 43:4 54:14 58:4 65:20 69:14 69:17 79:1 88:21 92:12 98:17 106:11 111:18 131:18 160:13,23 161:24 165:16 167:9 169:7 182:11 194:4 210:12 218:25 219:3 220:1 telling 98:12 162:4 tells 20:4 42:23 50:25 75:7 106:8 temporarily 181:16 temptation 40:20 ten 23:25 81:16 ten-months-a-year 117:7 tend 22:25 24:7 37:17 77:25 tended 34:8 tendency 143:10 tends 37:20 116:17 term 117:4 terminology 149:14 termly 151:6 terms 13:2,19 14:20,25 17:8,12 21:12 32:21 35:22 46:5 59:15 61:7 69:18 74:25 89:3 89:13 105:9 106:11 118:16 122:1 127:2 128:19 144:2 145:22 146:4,22 152:9 160:4,10,17 160:17 165:5 170:13 171:6 181:13 183:12 187:21,22 192:19 192:20 196:16 205:12,16 206:13 209:22 211:19	214:17 218:17,18 terribly 191:10 test 2:7 30:6 50:5 69:5 104:24 105:3 140:10 184:21 215:8,20 tested 104:20 texts 53:7 thank 1:24 2:4,5 15:5 31:11 35:13 115:7,12,17 131:25 138:9,17 139:19,20,20,23 140:5,23,24 142:2 146:16 150:4,12 151:5,9 155:20 159:3 171:23 172:5 178:20 182:2,8 183:15,18 183:20 184:13,18 185:23 206:3,5,22 206:23 217:8 221:15,17 222:3,5 222:6,9 theme 125:9 160:3 theoretical 199:11 theoretically 198:23 theory 122:4 therapist 158:2 therapy 26:11,11 they'd 121:17 166:10 thing 27:3 28:11 34:25 36:25 42:13 45:17,17 49:17 50:19,23 59:18 60:16 78:14,15 87:10 98:6 106:5 111:17 119:8 134:12 135:23 153:25 155:11 165:20 166:8 170:7 176:8 177:22 191:17	197:4 206:4 things 6:18 15:14 16:1 19:1 26:12 29:8 30:22 34:16 36:1,17 45:18,22 45:22 47:16 49:3 49:16 50:21 51:8 54:17,20 56:15 59:13 61:11 68:22 69:13 70:14 71:5 78:14 81:15 85:11 85:11 89:12,19 91:20,22,25 97:14 98:11,12,17 99:8 106:2,21 138:14 138:17 140:6 141:16 145:10 146:17,20 147:24 154:20 163:3 166:10,12 168:19 169:8,22 170:21 183:11,11 186:13 186:14 202:2 204:10 211:22 212:6 220:20 think 2:20 5:24 6:14 7:4,24 8:8 9:24 10:20,24 13:18,25 17:15,20 17:22 18:21 19:10 20:3,5,6 21:5,19 24:18 26:24,24 30:17 31:10 32:3 33:3 34:18 35:4 35:21 37:7 38:11 38:15 39:4,18,24 40:5,8,21,24 41:22 42:1 43:25 44:18,25 45:2,5 45:12,25 46:2 47:5,16,19 48:17 49:8 50:17 51:15 51:24 52:8,21,24 53:10 54:4 56:19 57:9 59:9 63:4	66:8 68:3 70:10 70:22,23 72:17,19 76:15,18,25 77:8 79:25 80:13,24 81:3,4 84:23,24 85:9 86:2,11 88:20 89:11 90:2 90:8,11 92:3,6 93:7,25 95:8 99:12,14,17,18,21 99:24,25 100:13 100:15 104:14,17 104:18 106:5,6,10 107:6,10 108:4,8 108:8,15,24 109:7 109:10,13 110:4,8 110:12 111:19 112:3,6,10,11,12 112:25 113:11,23 114:2,16 115:20 116:13 118:3 120:5,8,8 122:6 122:24 123:14 124:5,12 125:2 126:8 127:7,17,18 127:18 128:7,13 130:3,19 131:20 132:9 134:12,13 134:14,18 135:20 136:3,9,12 137:4 138:5,6,17,22 139:15 143:1 146:23 149:6,13 150:4,15 154:10 155:5,11 156:21 157:17,18 158:14 158:18 159:16 160:4,11 165:25 166:8 168:12 169:9 172:24 179:20,22 182:19 184:9 185:15,21 188:25 190:20,21 196:12 197:7,11 198:23 199:12	201:15,25 204:1,3 204:10,12,15,22 204:22 205:13 207:5,8,9 208:10 208:13,21 209:1 209:17,18 211:5 213:2 214:8 218:10,15,16 219:8 220:19,25 thinking 26:8 35:23 36:24 37:14 60:5 64:21 71:19 73:22 74:23 117:19,23,24 120:10,18 121:6 122:12 123:1,15 123:22 137:7 143:5,7,13 189:15 192:1,20 198:9 219:10 thinner 127:22 thinnest 128:15 third 1:13 3:9 20:20 191:4 212:2 thirdly 2:15 185:3 195:15 thirsty 147:16 thorough 22:23 30:14 thought 46:17 59:12 67:7 105:7 133:10 180:2 201:19 202:22 204:19 three 1:9 3:16 29:25 41:6,7,8,10 43:20,20,20 44:7 44:8,13 61:24 88:18 100:9 118:11 142:4 170:14 172:13 194:7,18 195:2,3 197:12 220:18 three-course 50:9 three-year 41:9
--	---	--	---	--

threshold 92:10,13 92:13,15 94:11,20 95:6	toast 50:8	14:18 138:19,19	157:25 161:22	UK 44:10 116:24 136:2
thresholds 95:7 114:3,8	today 2:5 6:8 65:12 119:1 142:3	transparent 40:23	177:19 208:7	ultimate 79:15 97:24
Thursday 1:1	161:12 173:14	trauma 93:12	tub 185:13	ultimately 51:25 66:19
tidy 117:12	184:25 222:8	traumatic 105:7	tuition 126:15 192:1	unable 52:11 107:24 129:21
Tier 116:17	toileting 194:23	treated 52:19 54:13	turn 85:3 123:11 125:23 140:25	unacceptable 177:11 183:1
ties 124:24	toilets 51:2	tree 198:22	168:12,13 172:6	unanimous 175:17
tiger 103:14	told 38:19 39:11 40:11 61:11 73:21	trend 127:6	185:20 186:15	unannounced 57:3 64:18
tighter 127:15	91:21 195:19	tribunal 13:21 31:21 52:1 66:15	turning 2:25 5:24 185:19	unassertive 59:17
time 2:14 4:23 6:14 6:22 12:18 13:15	217:19 218:25	70:10 104:22,23	tutoring 191:10 192:16	uncertain 109:16
23:6 24:24 31:5	tolerance 161:21	105:1,2	tutors 126:5,5,12	uncomfortable 103:1 165:15
33:12,25 40:11	tolerated 177:12,15	tries 14:10	two 1:6,10 2:25 3:2 6:23 16:10 22:18	under-refer 215:15
41:25 42:2 46:3	tomorrow 222:8	trifle 127:18,23	23:1,10 24:2 31:3	underaged 216:5
46:20 57:12 58:20	tool 216:23 217:1	trigger 55:3 117:15 119:10	32:10 43:20 44:10	underlies 90:1
61:5,6,9,25 66:23	tools 139:9 161:6	triggered 9:20	45:22 46:1 47:14	underlying 42:25 53:11
67:7,15,19 71:17	top 63:10 84:9 150:20 164:3	triumvirate 82:11	47:23 49:11 52:10	underneath 32:5 66:7 117:1,9
74:15 77:20,22,23	174:14 176:4	trivial 50:18	52:15 59:13 63:9	underreport 154:11
78:7 85:8 86:12	180:12	troops 31:24 48:22	67:11,23 69:13	understand 6:9 12:20 20:12 22:24
87:25 89:7,10	topic 125:23	true 3:4,13,25 63:14 106:9	75:17 76:9,23,23	29:21 40:12 43:5 51:13 57:2,5
92:4,20 93:23	total 72:8 109:17	131:12 141:6	84:13 89:10,19	61:21 62:13 64:11 72:6 80:16 84:3
94:13 95:22	totality 204:21	186:4,21	103:6 104:11	85:8 86:16 98:1,4 106:18 128:8
102:21 103:7,22	touch 155:1 176:23	trust 139:25 141:12 141:16,18 142:25	115:20 116:20	130:10 145:8 146:25 152:3
104:17 111:19	touching 147:23	143:9 144:18	138:19 144:17	158:4 159:8 160:5 164:14,16 166:1
113:18 114:24	tougher 114:9	150:10,14,19,23	151:23 152:14	168:23,25 177:21 186:7,24 190:3
116:5,9 118:12	tour 60:3	152:9,12 153:1	166:21 170:14	191:18 192:18 193:7 195:16
140:18 142:24	track 48:3	154:7 155:3	172:25 173:3,16	198:7 200:11 201:4 203:6,8
147:12,16 148:22	tracked 55:18	165:24 167:15	181:22,23 199:14	206:6 209:4 215:5
162:6 170:12	trade-off 14:5	172:25 177:10	211:19 220:18	
171:24,24 177:13	trained 137:10 154:8 160:2 162:4	182:2,22,23	two-month 103:4	
177:15,21 178:8	training 12:3 25:4 25:6 30:4,15,18	183:12 196:2,6,19	two-thirds 30:15	
179:11 181:4	30:19,21 31:3,8	trust's 177:3	two-tier 150:19	
182:2 184:4 185:1	34:16 36:20 71:25	trusted 40:9 106:6	two-way 147:7	
187:15 190:1	73:4,8,12,19,23	trustee 153:5	two-week 164:1	
201:16 205:8	73:24 74:9 75:5,8	trustees 150:22 151:2,3,18,23	type 25:19 31:16 169:13	
217:5 220:7	75:11,12,13 78:6	try 1:20 2:19 5:12 72:24 140:21	types 9:14 90:4 189:1	
times 22:18 27:2 101:11,12 104:12	83:12,15 84:4	158:24 187:12	typical 159:10	
113:18 129:24	139:4 149:4 166:5	196:7 201:23	typically 124:22	
135:9 194:18	194:8,25 197:14	204:3 208:15		
195:2,3 197:12	transferred 89:2	trying 9:24 69:3 75:1 86:13 88:21		
timetable 148:8	translate 14:15			
title 4:7 60:20	translating 14:11			

218:13	108:6	varied 87:4	visit 58:7 136:24	128:23 154:16
understanding	unsafe 119:18	varies 117:3	visitor 123:6,6	159:19 202:20,21
14:13 62:18 71:25	unspent 189:20,22	various 11:12	157:8,16,20 158:1	wanting 15:8
92:6 114:19	190:18 193:2	30:18 48:21 49:3	158:10 196:17	wants 49:18 147:14
118:20 152:14	unsuitability 175:2	76:12 77:9 85:2	visits 125:14 157:8	147:16
153:19 157:24	unsuitable 175:8	89:14 95:7 120:16	Visual 148:8	warrant 105:19
160:24 167:23	178:23	138:3 142:20	visually 144:9	washing 194:23
168:24 171:3	unsupervised 64:9	145:8 172:23	vocational 126:15	wasn't 32:25 49:5
173:23 176:19	69:10	184:22 202:15	voice 126:5 158:9	51:12 54:17 59:12
179:7 180:1	unsurprisingly	220:21	158:12,24 161:8	66:12 80:14 81:12
181:18 197:10	59:25	vary 137:23	162:4	88:23,24 93:15
220:21	unusual 35:14	varying 128:4	volume 88:7 221:22	97:5 103:10 120:2
understands 80:3	56:19 73:11 146:6	vast 39:5,9,15	voluntary 193:9	172:10 174:3,10
147:12	162:18	vehicle 194:11	204:8	174:23 198:16
understood 22:23	unusually 172:16	verbal 148:12	volunteer 199:24	202:25
56:22 150:6 160:1	up-to-date 119:6	verbalise 161:3	volunteering 200:5	watch 161:18
undertake 14:21	use 6:25 11:5 40:6	verified 66:12	volunteers 199:16	169:25
28:14 46:12 57:14	57:5,10 85:17	verify 138:6	vulnerability 177:6	watching 140:8
58:21 59:1 68:13	94:14,17 95:13,14	version 6:21,24,24	vulnerable 53:1	way 2:18,18 10:15
73:16 125:17	96:9,11,13,15	6:25	144:6,19 150:17	14:11 19:3 30:15
undertaken 48:20	102:12 103:18	vetting 142:12	159:1,7 188:23	41:1 42:9 54:12
54:11 75:5 207:24	104:13,15 105:4	187:21 201:6	193:20 202:2	54:13 68:16,17,18
undertaking	122:22 123:13	Victoria 118:6,7		70:7 72:5 74:1
189:18 207:25	139:17 169:11,12	119:1	W	77:6 80:24 81:20
undertook 20:14	181:8 191:4,21	view 8:14 41:13	wage 109:24	90:14 101:5
27:17 38:17,18	useful 11:21 74:24	58:20 66:16 67:7	wait 59:22	103:12 110:18
48:20 80:23	132:22 162:13	72:7 86:18,19,19	waited 61:12	114:3 117:6 120:2
undress 62:13	189:15 193:22	97:18 107:5	waiting 166:20	120:12 122:5
64:24	199:10 218:10,15	110:19 115:24	waking 146:7	124:2,12 147:18
unearth 31:8	usefulness 126:7	116:2 123:8 126:6	want 23:6 32:3	149:19 150:5
unexplained 173:9	users 79:16	126:8 129:11,21	37:12 43:5 59:6	154:12 159:10
unfortunately	uses 121:23 159:20	133:10 136:14	72:2 75:10 81:21	160:14 161:6
57:12 185:12	Usher 1:24	158:16,19 175:2,7	92:11 100:24	162:19 165:19
unique 36:9 138:11	usually 103:21,21	181:3 199:25	114:15 121:1	169:3 170:22
unit 145:20 149:3	136:5	208:23 209:17	136:23,25 138:18	177:9,18 192:24
units 86:5,25 87:2	V	viewed 97:17	146:5 147:8	193:6 198:19
87:11 149:1	v 63:2	views 13:9 24:13	163:18 170:4	203:25 210:17
unknown 70:4	vague 10:24	102:12 107:4	187:12 189:13	211:17 212:2
unmaintained	valuable 130:11	177:24 183:3	192:10 201:10	215:14 219:16
16:21	value 60:17 121:24	violence 190:10	206:4 215:18	221:2
unproductive	123:16	visa 116:17	217:22 218:21	ways 37:22 56:19
64:18	values 68:16	visibility 10:7	wanted 20:15 21:5	127:16 149:25
unprofessional	variable 17:10,11	visible 101:2	28:12 29:17,18	154:15 162:16
66:21	87:13	160:20 170:3	45:10 56:2 59:4	we'll 94:25
unregistered 108:5		vision 185:10	65:13 115:23	weaker 97:21

weakest 97:17	wholesale 51:19	work 4:13,20 14:19	207:3	years 4:14 5:2 8:24
weakness 99:24	wholly 218:6	16:18 20:13,14	world 10:8	41:7,8 52:9 84:13
weaknesses 47:14	wide 73:13	21:11 23:2 24:11	worried 40:4	102:15 104:15
56:9 67:22 98:23	widely 160:20	27:4 30:24,24	117:21	105:25 107:22
195:20	widen 36:13	44:9 81:23 83:1	worry 11:20 40:17	108:22 118:11
wear 165:2	widens 36:25	84:2 86:8,13 87:4	worrying 69:25	120:3,15 127:8
wearing 86:14	wider 4:8 103:23	87:25 88:3,6,18	91:24 94:6	129:17 130:20
weary 115:1	120:10	89:13,23 90:1,18	worst 112:3	134:5 143:2,22
website 28:14	widespread 46:2	100:18 107:14,22	worth 217:6	168:6,7,9 183:3
week 31:4 41:20	Wilshaw 80:22	108:4,5 109:8	worthless 15:12	220:18,23
43:11 50:7,11	window 78:12	114:19 117:19	worthwhile 100:14	years' 187:5
68:21 71:20 75:20	Winterbourne	122:7,10 126:11	wouldn't 16:10	yesterday 16:7
116:1 119:12	87:22	129:13,14,18,18	59:22 63:16 65:12	123:23
124:10 126:1	wish 2:23 8:23	130:9,21 131:4,9	92:1 102:21	young 23:5 102:12
161:11 166:25	12:21 185:2,17	132:1,3,7,12,18	133:22 189:5	144:18 159:23
180:19 181:10	wishes 2:21 174:22	134:2 135:5	191:10 198:15	184:1,3,6,15,18
192:2 194:19	184:11	149:10 155:6,9	205:10 213:4	185:19,22 186:3,6
198:10 205:6	withheld 120:24	160:4 167:9 170:7	214:3 216:5	186:7,10,14 187:2
weekends 117:5	witness 1:10,11,13	175:3,8,18 176:4	write 40:2 56:24	187:9,22 188:4,6
weeks 57:5 103:21	2:10 3:2,4,9,11,16	176:18 177:1	writing 62:7 147:10	188:9,18 189:3,11
115:20 166:21	3:23 5:7 20:20	178:24 180:7	written 2:15 18:1	189:20,24 190:8
203:13	51:4 66:9 81:17	183:5 194:11	33:14 112:20,22	190:13,19 191:1,8
weeks' 31:4	93:21 104:8	195:4 197:13	113:10 168:23	191:16,19 192:6
weigh 105:9 217:3	111:14 112:17	199:10 203:16	wrong 40:21 48:22	193:1,10,16 194:3
220:4	126:23 140:11,19	205:17 207:16,21	50:16 65:20 77:19	194:7 195:3,8,17
weight 128:9	141:3,9 150:15	208:18,20 210:20	97:23 107:11	196:8 197:19
welcome 1:3	152:11 165:10	worked 4:19 88:16	136:1 146:20	198:6,23 199:6,23
101:15,17	183:24 184:22	135:8 198:13	149:9 198:22	200:12,18,21
welcomed 209:2	185:5,25 186:2,19	worker 124:23	215:14 221:9	201:13,25 202:18
welfare 11:17	189:1 193:23	workforce 22:8	wrongly 81:8	202:25 203:21
39:22 61:19 70:21	201:4 206:6	working 10:23 13:7	wrote 57:1,4 63:3	204:10 205:9,16
127:4 136:11	207:18 217:7	13:11 25:1 27:13	112:19 130:4	205:21,24 206:10
wellbeing 25:7	witnesses 1:6 143:3	47:7 71:10 75:22	181:20	207:5,11 222:21
164:9 194:10	Wolfe 43:15,16	86:14 89:25 95:2		youngest 168:8,8
wellbeing-type	women 78:22	95:8 107:14	X	
36:17	won 105:1	129:25 130:1	X 222:14	Z
Wells 68:4	wonder 138:13	132:14,20 155:15		
went 21:8,15 31:24	wooded 64:8,12	162:6 188:23	Y	0
46:23 48:22 51:25	69:10	193:11,12,19	year 20:10 47:25	0 119:17
61:10 64:6 70:13	wool 108:21	199:16 204:7	70:5 76:6 104:12	002 164:12
76:12,13,13 84:10	word 57:6,10 82:9	208:6 209:12,23	113:10,11 117:6	003 168:21
87:14 133:18	159:9 169:9	211:15 212:7,21	118:9 121:13	008 169:2
weren't 21:5 93:4	191:21 215:19	workings 138:8	127:7 130:19	009 169:2 174:25
102:12 183:10	words 7:9,14 27:24	works 40:16 72:16	143:21,21 213:3	019 81:18
whilst 19:22 70:22	135:6	178:9 195:18	yearly 221:23	

1	2000 18:2,6,8,24 85:24 86:1 127:1 178:7	2017 4:10 156:23	30:20 132:8
14 :10 45:6	2001/2002 142:7	2018 66:21 141:14 141:21 156:25 207:19	5(i) 1:9,19
1.40 115:6,15	2002 6:10,15 34:1 86:1,1,7 87:17,18 121:22 172:8	2019 1:1 3:17,18,19 3:19 144:22 207:23	50 6:16 144:23,23
10 1:1 155:6 221:5	2004 4:19 86:1,7	2020 167:15	50,000 221:25
10.00 1:2 222:8,11	2005 127:6	221 222:24	222:1
10.45 35:10	2006 202:3,11,13	23 200:7	500 124:9
11 10:21,25 188:25 189:6	2007 44:2,3 86:8 89:5 92:5	24 3:19 55:21	6
11.00 35:9,12	2008 34:1 42:17 44:20,23,23 45:1 85:10,25 113:17 135:23	24-hour 146:10	6 1:9,19 30:18
11.15 2:12	2010 18:23,24 34:21 35:20 36:2 38:9,20 41:17 42:14 45:13 48:4 48:25 49:3 127:1	25 88:17 104:12	600 124:9
11.4 159:2	2010/2011 41:25	27 24:18 119:9,13 187:5	7
11/12 74:15	2011 6:10 31:19 34:24 45:6,7 48:8 51:12 52:5 62:17 70:22 100:6 101:5	28 118:23 119:17	7 1:9,19
12 132:10	2011/2012 36:4	29 44:2 119:18	7(i) 1:9,19
12.40 115:13	2012 57:7,8,18,21 62:11,17 65:16 74:14 90:21 91:12 91:25 93:22 96:22 133:1,6,9,9 199:15 201:22,25 204:16	295 155:24	700 124:9
13 75:17	2013 6:11 31:21 48:21 54:11 64:6 70:9 74:2,4 76:4,9 76:11 78:11,18 101:23,24 133:12	3	8
131 20:5 222:18	2013/2014 102:24	3 3:17,18,19 29:22 30:2 48:5 216:24	8 3:18 78:3 168:7,9 185:22,22
136 20:4 112:16	2014 32:17 81:25 82:1,3 89:16 103:5,8,10	3.00 172:2	87 59:19
140 132:4 222:19 222:20	2015 6:11,25 85:5,6 103:3 105:15	3.15 172:1,4	9
148 131:22		30 104:12 112:7 113:14 115:2 143:22 194:18 197:12 215:16,17	9 1:3 150:15 185:22 185:23
152 :13 5:2 127:8 193:23		31 11:18,19,19	98 43:17,20,21,24
159 11:22		34 81:21	99 176:16,17 178:5 178:10 179:25 180:3,6,16,18 181:2,8,13,19 182:1
164 :14 52:24,25 198:12		37 12:4	
17 213:3		39 75:21	
18 168:6		4	
184 222:21,22,23		4 116:17	
19 168:6		4.22 222:10	
1950s 144:25		40 131:20 132:5 143:18,22 155:15	
197 12:4		44 123:6,25 144:22 157:15,16,20 158:10 163:4	
1974 187:25		47 59:1 63:17	
1989 6:6 87:3		5	
1990s 167:18		5 1:18 21:19 30:17	
1996 32:15			
1999 172:7			
2			
2 11:10 119:22 129:2,8 131:1 168:6 203:11 222:15,16,17			
20 23:19 115:1 120:3,15 125:15 176:22 183:3			