

<p>1 Thursday, 26 November 2020 2 (10.30 am) 3 THE CHAIR: Good morning, everybody, and welcome to Day 9 of 4 this public hearing. Ms Bicarregui? 5 MS BICARREGUI: Thank you, chair. 6 MR ALBERT HEANEY (affirmed) 7 Examination by MS BICARREGUI 8 MS BICARREGUI: Mr Heaney, before we start, just a few 9 introductory remarks. This isn't a test of memory. You 10 have a bundle of documents in front of you. Please feel 11 free to refer to them, or to any notes. 12 Occasionally, I will be asking Danny, our evidence 13 handler, to get up certain documents on the screen. 14 That can take a few moments to arrive, so if you just 15 bear with us. 16 We take a break every hour for 15 minutes. Please 17 don't worry if we lose you. Just stay where you are, 18 and we will try to make arrangements to have you brought 19 back. 20 I am going to be asking you questions, and, once 21 I have finished, the chair and panel may have some 22 questions for you. 23 Mr Heaney, you have given us two statements for this 24 phase of the investigation. This morning, we are going 25 to be focusing on your second statement. Could you turn</p> <p style="text-align: center;">Page 1</p>	<p>1 to tab A2 of the bundle in front of you, please and 2 check your witness statement is there. 3 <b>A. Apologies, counsel. I didn't realise I had to have my 4 bundle in front of me this morning. I have left that at 5 my office desk. But I can confirm that that document -- 6 because I have read it -- was indeed in the bundle and 7 the evidence I provided.</b> 8 Q. Can you confirm that that statement is still true, to 9 the best of your knowledge and belief? 10 <b>A. I can confirm that, thank you.</b> 11 MS BICARREGUI: Chair, because it is a very detailed 12 statement, could I ask permission for that to be adduced 13 in full? 14 THE CHAIR: Yes, of course. 15 MS BICARREGUI: Thank you very much. For the avoidance of 16 doubt, that's the second statement, WGT000476. Thank 17 you, Mr Heaney. 18 Mr Heaney, could you tell us your job title, please? 19 <b>A. I work within the Welsh Government as the deputy 20 director-general in health and social services.</b> 21 Q. I know you have provided the inquiry with a number of 22 statements for other investigations, and you have given 23 oral evidence to the inquiry before as well, I think? 24 <b>A. I have, indeed, counsel. I have a lead coordinating 25 role for the Welsh Government in relation to this</b></p> <p style="text-align: center;">Page 2</p>
<p>1 <b>inquiry.</b> 2 Q. This morning, I am going to be asking you some questions 3 to give an overview of the role the Welsh Government has 4 in safeguarding children in education in Wales, how that 5 differs from the system in England. As you know, 6 a colleague of yours this afternoon will then be looking 7 at how that applies in a specific case, a case of an 8 independent school. 9 So just to give us an overview, then, you tell us in 10 your statement that, in the 2018 to 2019 school year, 11 there were, I think, 442,000 learners aged 4 to 18 in 12 schools in Wales. Is that right? 13 <b>A. Yes, indeed.</b> 14 Q. I think five independent schools didn't give you any 15 data, so it is a bit higher, but it's about that number. 16 There are 41 special schools in Wales, I think? 17 <b>A. Yes. The latest that I have in terms of schools in 18 Wales is that we have 75 independent schools, 19 38 mainstream provision and 37 with special educational 20 provision.</b> 21 Q. So it's changed slightly. I think it was 80 in your 22 statement independent schools. So now 75 independent 23 schools. There are no grammar schools in Wales, are 24 there? 25 <b>A. There are no grammar schools in Wales, and there are no</b></p> <p style="text-align: center;">Page 3</p>	<p>1 <b>academies in Wales.</b> 2 Q. No academies, or free schools? 3 <b>A. Yes.</b> 4 Q. It is not possible to establish an academy or a free 5 school or to change the category of an existing school 6 to an academy or free school in Wales? 7 <b>A. No, in Wales, the direction of travel has been very much 8 over a number of decades with the Welsh Government 9 around comprehensive education, a very strong belief in 10 comprehensive education, in terms of fairness and 11 equality for all.</b> 12 Q. So you have a system, then, where there are independent 13 schools and then there are schools maintained, 14 essentially, by the local authority? 15 <b>A. We do.</b> 16 Q. I think you say that your view in the Welsh Government 17 is that there is an important place in the education 18 system for local authority responsibility and oversight 19 of schools; is that right? 20 <b>A. Yes, indeed.</b> 21 Q. You talk about, I think -- that's in order to maintain 22 both democratic accountability and a direct connection 23 between schools and their communities. Can you tell us 24 what you mean by "democratic accountability" in that 25 respect?</p> <p style="text-align: center;">Page 4</p>

1 **A. I think, in terms of democratic accountability, there's**  
 2 **a very strong belief in Wales that some things should be**  
 3 **national, so national standards, national procedures,**  
 4 **national safeguarding arrangements. But then, as we**  
 5 **drive down within a nation, there are some things we can**  
 6 **do well as a smaller country in a national capacity, but**  
 7 **there are other things then that should be around**  
 8 **localism. The local community, we see schools really**  
 9 **being embedded within local communities and that kind of**  
 10 **local democratic accountability comes through at a local**  
 11 **government level, in terms of local government decisions**  
 12 **that local councillors will make in terms of -- as**  
 13 **a Local Education Authority.**  
 14 **Q. I think a little bit later we will come on to look at**  
 15 **the kind of oversight that local authorities have of**  
 16 **schools in Wales. So at that point we will look**  
 17 **a little bit more at the detail.**  
 18 **Could you tell us, Mr Heaney, when responsibility**  
 19 **for the education in Wales was fully transferred to the**  
 20 **Welsh Government?**  
 21 **A. Back in the '90s, you will be aware of the election that**  
 22 **took place in '99, and then the National Assembly for**  
 23 **Wales, as it was called then, was created, and in 2002,**  
 24 **through the Education Act and responsibilities, Welsh**  
 25 **Government then becomes the significant player, if I put**

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1 **strengthening. The Act brought together arrangements**  
 2 **around the legal framework around safeguarding. Part 7**  
 3 **of the Act aligned the statutory guidance. Volumes,**  
 4 **then, of statutory guidance around general safeguarding**  
 5 **duties and handling individual cases.**  
 6 **The Act also created six regional Safeguarding**  
 7 **Children Boards with responsibility within those defined**  
 8 **areas. It also created a National Independent**  
 9 **Safeguarding Board that has a number of roles and**  
 10 **functions, one of which is advising Welsh ministers on**  
 11 **safeguarding arrangements.**  
 12 **It also introduced a duty to report. I think, in**  
 13 **its day, that was a major step forward. We are aware,**  
 14 **as a government, from learning from this inquiry, that**  
 15 **that is a duty that we are reviewing, looking at the**  
 16 **areas in which we can strengthen, in light of**  
 17 **the discussions that have taken place during the course**  
 18 **of this inquiry.**  
 19 **Q. Actually, I would like to look at three aspects of that**  
 20 **in respect of this investigation. I definitely want to**  
 21 **look at the section 130 mandatory duty to report, and**  
 22 **then a little bit about the National Independent**  
 23 **Safeguarding Board and the six regional safeguarding**  
 24 **boards. So those are the three aspects, I think, that**  
 25 **we will focus on, in terms of the schools.**

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1 **it that way, has a significant role and responsibility**  
 2 **for education in Wales.**  
 3 **Q. I think, from your statement, again, it was fully**  
 4 **transferred in 2011; would that be right?**  
 5 **A. That was when -- as I journey onward -- and it is always**  
 6 **complicated at hearings like this. But the journey**  
 7 **forward then, devolution and the powers of devolution**  
 8 **evolved that gave us more and more powers over the years**  
 9 **and, indeed, in 2011, new legislation created the**  
 10 **foundation where we could go on and make new laws in**  
 11 **some areas that previously we wouldn't have been able to**  
 12 **exercise.**  
 13 **Q. So it's been a process, essentially, but key points in**  
 14 **2002 and then 2011?**  
 15 **A. Yes.**  
 16 **Q. I'd like to talk now about the Social Services and**  
 17 **Well-being (Wales) Act 2014. So this Act, I think, came**  
 18 **into force in April 2016; is that right?**  
 19 **A. It did indeed.**  
 20 **Q. You describe it in your statement as introducing**  
 21 **strengthened safeguarding arrangements in Wales; is that**  
 22 **a fair characterisation?**  
 23 **A. Yes, that is. It's always, for the inquiry to be aware,**  
 24 **a process of evolution. We are constantly learning,**  
 25 **learning from this inquiry, and developing and**

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1 **So the statutory duty, the mandatory duty,**  
 2 **section 130. As I understand it, that places**  
 3 **a mandatory duty on a person -- we will come to who is**  
 4 **covered in a minute -- who has a reasonable cause to**  
 5 **believe that a child is at risk of harm of abuse and**  
 6 **neglect or other kinds of harm, to refer the matter to**  
 7 **the local authority; is that right?**  
 8 **A. Yes, indeed.**  
 9 **Q. The duty is placed on what's described as relevant**  
 10 **partners. We are not going to go through that list of**  
 11 **relevant partners, because I think we are going to look**  
 12 **at it just in the context of education, Mr Heaney. But**  
 13 **before we look at that, can I just check, there is no**  
 14 **sanction in the legislation, is there? So if you don't**  
 15 **report, even though it is mandatory -- obviously that is**  
 16 **a breach of statutory duty in itself, but there is no**  
 17 **sanction in the legislation; is that right?**  
 18 **A. Currently, that's one of the areas that we are**  
 19 **reviewing. At this moment in time, the sanction that we**  
 20 **would say applies is around fitness to practise, so we**  
 21 **see that very much in terms of the professional duties**  
 22 **and codes around the professionals within the**  
 23 **safeguarding arena.**  
 24 **Q. So for teachers, for example, in maintained schools,**  
 25 **that would lead to the Education Workforce Council**

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1 considering that as a sort of --  
 2 **A. We see that being appropriate in the circumstances.**  
 3 Q. Danny, could we see INQ006375\_030-031. Mr Heaney, this  
 4 is the 2020 version of Keeping Learners Safe -- this is  
 5 the equivalent of Keeping Children Safe in Education in  
 6 Wales. If we could highlight "Reporting a child at  
 7 risk", so from paragraph 3.31. This is the section 130  
 8 duty, Mr Heaney. If we could have a look at this. This  
 9 is the guidance that would be for local authorities and  
 10 for schools. It says here that the 2014 Act places  
 11 a duty to report on local authorities and relevant  
 12 partners where they have reasonable cause to suspect  
 13 that a child is at risk. It says:  
 14 "Partners must inform the local authority where they  
 15 have reasonable cause to believe a child to be at risk."  
 16 And that is defined. 3.32 talks about relevant  
 17 partners and tells us that they include education,  
 18 health, police, probation. I think this is the critical  
 19 part, from our perspective, in terms of teachers in  
 20 schools. It says:  
 21 "Anyone working in an education setting and employed  
 22 by a local authority, local health board or trust,  
 23 police or probation service ..."  
 24 But I think for our purposes largely by a local  
 25 authority:

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1 Do you see that?  
 2 **A. Yes, indeed.**  
 3 Q. So that suggests that, if you are a teacher who is not  
 4 employed by a local authority, there isn't a mandatory  
 5 duty to report, is there; it's just perceived as  
 6 effective practice?  
 7 **A. I think that the two things where we would describe it**  
 8 **in a different way. We would say that one relates to**  
 9 **the formal mandatory reporting within the**  
 10 **Social Services and Well-being Act 2014, the section 130**  
 11 **that you mentioned earlier, counsel. However, this is**  
 12 **formally issued as statutory guidance. So, you know,**  
 13 **this is to be effective practice.**  
 14 **So, although one is not covered by one**  
 15 **legislation -- and I did refer earlier that that is an**  
 16 **area that we are reviewing -- the clear mandate here is**  
 17 **that those in other settings should refer to Wales'**  
 18 **safeguarding procedures and should, therefore, refer.**  
 19 **So that would be the view that we would hold from**  
 20 **a Welsh Government perspective.**  
 21 Q. Thank you. Danny, that can come down, thank you.  
 22 Just so that I am clear, though, the guidance talks  
 23 about "must" and "should"?  
 24 **A. Yes.**  
 25 Q. Clearly "must" is a legal requirement; "should" is, you

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1 "... must report to the local authority where there  
 2 is reasonable cause to believe a child to be at risk of  
 3 abuse, neglect or other kind of harm."  
 4 So am I right in saying, then, that where a teacher  
 5 is employed by a local authority in Wales, there is  
 6 a statutory duty to report, where they have reasonable  
 7 cause to believe a child is at risk of abuse? Is that  
 8 right, Mr Heaney?  
 9 **A. Yes, that is right, because under the Keeping Learners**  
 10 **Safe statutory guidance, you know, this is formally**  
 11 **issued by the Welsh Government. But also this guidance**  
 12 **applies to independent schools, proprietors of**  
 13 **independent schools, as well. So there is a clear**  
 14 **expectation that, across the education community,**  
 15 **referrals would be made, as expected, in line with**  
 16 **safeguarding arrangements.**  
 17 Q. Danny, could we get up the next page, please, of this,  
 18 \_031. What we see here at 3.34, if you could highlight  
 19 that, please, for me, it says there:  
 20 "All other staff working in education settings who  
 21 are not employed by the local authority, or any of  
 22 the other organisations ... should take account of  
 23 the Wales safeguarding procedures, which sets out the  
 24 duty to report should be considered as effective  
 25 practice."

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1 should do it unless you have good reason not to. Then,  
 2 in Wales, you have this third category of "effective  
 3 practice". It seems that effective practice is a lesser  
 4 requirement than "should", isn't it, in the guidance?  
 5 **A. From a safeguarding perspective, you know, effective**  
 6 **practice, to us, is a requirement. I have previously**  
 7 **consulted with our legal advice on this as well, and,**  
 8 **you know, we are very clear that the expectation is that**  
 9 **those referrals must take place. So, you know, I will**  
 10 **obviously take away from this inquiry any learning that**  
 11 **comes from it, in terms of whether we need to sharpen**  
 12 **and make sure that we focus and get our -- you know,**  
 13 **terminology is critical when it comes to implementation.**  
 14 **But our expectation is clear that all of those partners**  
 15 **should -- "should/must" -- must refer when it comes to**  
 16 **child protection, and I think -- I believe that the**  
 17 **All Wales procedures are very clear on that remit.**  
 18 Q. So it may be -- certainly it looks as though, Mr Heaney,  
 19 at the moment, doesn't it, like the mandatory duty only  
 20 kicks in with teachers who are employed by local  
 21 authorities?  
 22 **A. As I have said earlier, the mandatory duty under**  
 23 **section 130 of the Social Services Well-being (Wales)**  
 24 **Act, you know, has, in its day, been a major step**  
 25 **forward in Wales. We are reviewing that now, in light**

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1 of our learning from this inquiry, from the discussions  
 2 that were held in other parts of this inquiry, in terms  
 3 of duty to report. We see an opportunity to strengthen,  
 4 to relook at the groups that are covered by that. So  
 5 that will be part of the Welsh Government's work  
 6 programme that we are committed to taking forward.  
 7 But, at the same time, we are very clear that we  
 8 have very strong safeguarding arrangements in place,  
 9 with a very clear expectation that all educationalists,  
 10 whether they're in independent settings or maintained  
 11 education schools, will refer and continue to be part of  
 12 that safeguarding world, and Keeping Learners Safe, this  
 13 is statutory guidance to those partners as well.  
 14 Q. Indeed.  
 15 A. But I understand the point being made and will be happy  
 16 to take that away under further consideration.  
 17 Q. Thank you. Because it does seem, at the moment, that  
 18 some teachers are under a statutory duty and others  
 19 aren't. So I think that would be --  
 20 A. We would say that the statutory duty comes from Keeping  
 21 Learners Safe. But I hear (overspeaking) I will take  
 22 that away, and I will take that away.  
 23 Q. Has the Welsh Government done any work to find out what  
 24 the effect of the duty in section 130 has been since it  
 25 came into force in 2016? Do you know whether that has

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1 led to an increase in referrals? Has any piece of work  
 2 been done about that?  
 3 A. We have looked at this previously in some detail, and it  
 4 did not -- it has not led to a substantive change in  
 5 practice. What we have cited previously from our  
 6 experience is that we have developed, as the Welsh  
 7 community, around safeguarding over a number of decades,  
 8 and our procedures went from being regional safeguarding  
 9 procedures into All Wales procedures. So our  
 10 operational practice has been at a level for a number of  
 11 years where, you know, the expectation of referrals and  
 12 process is very well understood by all partners, with  
 13 effective training and constantly, you know, updating  
 14 and refreshing as the need requires.  
 15 Q. I said we would look at three areas of the 2014 Act. So  
 16 there's the mandatory duty, which we have looked at. It  
 17 also created a National Independent Safeguarding Board.  
 18 That board -- what are its main duties, Mr Heaney?  
 19 I think it sort of oversees the regional boards; is that  
 20 right?  
 21 A. Well, in part, and apologies, I will go through that now  
 22 to try and clarify.  
 23 So the National Independent Safeguarding Board, you  
 24 know, we do believe that's a major strength. We think  
 25 that is a real asset to us in Wales. It is there to

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1 provide support and advice to the safeguarding boards,  
 2 with a view to ensuring they're effective. What it  
 3 isn't, it isn't kind of, like, a hierarchical line  
 4 management. So it doesn't have the authority over them.  
 5 They are responsible as a statutory board, the regional  
 6 safeguarding boards are responsible in their own right.  
 7 But it also has a view to look at the adequacy and  
 8 the effectiveness of the arrangements to safeguard  
 9 children and adults in Wales, and to make  
 10 recommendations to Welsh ministers as to how those  
 11 arrangements could be improved.  
 12 So the National Independent Board produces an annual  
 13 report, and in their annual report, they are very clear  
 14 on recommendations, where they feel we, as the Welsh  
 15 Government, could take responsibility in strengthening,  
 16 and some of those will, of course, from time to time,  
 17 include education.  
 18 Q. If I could just stop you there briefly, Mr Heaney. What  
 19 types of professionals sit on the National Independent  
 20 Safeguarding Board? Who is it who is sort of forming  
 21 this board and advising the Welsh Government?  
 22 A. Good question. So the range of professionals, they're  
 23 often lead standing figures in the child  
 24 protection/safeguarding world. They will come from  
 25 a range of professional groups. They're appointed

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1 independently. The panel itself has six members on it  
 2 with a range of skills from Social Services background,  
 3 safeguarding, education, you know, looking at a range of  
 4 backgrounds where professionals have been involved,  
 5 health background and also voluntary sector partners as  
 6 well; a range of real expertise.  
 7 So they're often leading figures in the child  
 8 protection community, but the important thing of a panel  
 9 is having a range of expertise. So it's not led by one  
 10 particular sector, it's a blended skill mix.  
 11 Q. The six regional boards. So you moved away from the  
 12 Local Safeguarding Children Boards into a more regional  
 13 structure. What was the thinking behind that, moving --  
 14 A. Yes, thank you. Thank you very much. The thinking  
 15 behind that at the time was very clear, was that, you  
 16 know, we had the basis for 22 Local Children's  
 17 Safeguarding Boards in Wales. You know, common  
 18 procedures, common practice, training, you know, really  
 19 crossed areas. They weren't unique to one particular  
 20 local authority boundary. You know, we did wide  
 21 consultation and then moved into the basis of six.  
 22 We believe that also strengthens the ability for  
 23 challenge, it strengthens the ability for partners to  
 24 work together and get consistency across communities,  
 25 across wider perspective. It gives, then, economies of

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1 scale around training and development of staff groups as  
 2 well.  
 3 Certainly, from our perspective, we have seen a very  
 4 good working relationship. We meet regularly, as the  
 5 Welsh Government, with those safeguarding boards. They  
 6 produce their annual reports. And so, again, we have  
 7 a very close, effective working relationship to make  
 8 sure then that we are developing effective arrangements  
 9 for safeguarding children and young people in Wales.  
 10 Q. Practically, if I'm a teacher in a school in Wales, what  
 11 will I be looking to the regional safeguarding boards  
 12 for? Are they delivering training? Are they  
 13 responsible for monitoring the level of training?  
 14 A. They will be responsible for a number of things. So  
 15 they will have, you know, a clear duty to work together  
 16 across professional boundaries, inter-agency, to have  
 17 planning processes, to make sure there's effective  
 18 arrangements, to actually -- the prevention of child  
 19 abuse, but also then the agencies' response to  
 20 child abuse. So from an education basis, the Director  
 21 of Education will sit on those boards, so very clearly  
 22 has that interface. Then those boards will assist in  
 23 learning, in development, in training, in making sure  
 24 there's consistency across both that region, but also  
 25 linking across other regions, so they have got duties to

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1 primary sector.  
 2 Q. I'd like to move on to look at the status of the United  
 3 Nations Convention on the Rights of the Child in Wales,  
 4 because Wales has passed the Rights of Children and  
 5 Young Persons Measure in 2011, so that now incorporates  
 6 the ECRC into Welsh law. Is that right?  
 7 A. That is correct. From 2011. It means, in practice,  
 8 that Welsh ministers must give the appropriate  
 9 consideration and regard to the United Nations  
 10 Convention in weighing up decisions that they are making  
 11 in relation to children's rights. We have developed  
 12 a children's right impact assessment which officials  
 13 then consider in the policy, in the legislative context,  
 14 in any proposals that ministers are considering, in  
 15 terms of the impact of those proposals on children and  
 16 their rights.  
 17 Q. So the idea was that any piece of legislation, primary  
 18 or secondary, would have regard to children's rights  
 19 when it was going through the process with the Welsh  
 20 Government?  
 21 A. Yes.  
 22 Q. Thank you. Danny, could we get up INQ006367\_001. This  
 23 is a document that you will know, Mr Heaney.  
 24 A. Yes.  
 25 Q. It's called "Children's Rights in Wales",

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1 do child practice reviews and other functions that you  
 2 would expect as a regional safeguarding board.  
 3 The important thing is about having effective  
 4 policies and procedure in place and then ensuring that  
 5 the practice in place is responding. So, you know, some  
 6 of the Local Education Authorities will have then  
 7 complementary arrangements in place, where they will  
 8 have, you know, senior safeguarding -- education  
 9 safeguarding managers, who will work with local schools  
 10 to make sure that knowledge and arrangement is also at  
 11 a local level, so that both teaching staff and, of  
 12 course, the very important governing bodies as well are  
 13 part of being regularly refreshed and updated in terms  
 14 of the arrangements that are in place to safeguard  
 15 children.  
 16 There are a number of -- again, I mentioned  
 17 complementary. You know, Wales is going down very much  
 18 a whole-school approach, working together within that  
 19 community to develop support services for mental health  
 20 and well-being for children and young people within an  
 21 education setting. We see that being all part of our  
 22 response, at lower-level concerns, to be able to respond  
 23 to children and young people's needs, whether that's  
 24 through a school's counselling arrangements that are in  
 25 place for secondary schools and year 6 within the

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1 dated August 2020. This is written by the Welsh  
 2 Parliament, or the Senedd. They considered how well the  
 3 measure was working because it was nearly ten years,  
 4 I think, since it was passed, and so they decided to  
 5 look at it. The Children's Commissioner for Wales told  
 6 us in her evidence that this report was due to be  
 7 published. Danny, if we could go to \_008, this is part  
 8 of the preface, and the third paragraph down says:  
 9 "Our inquiry on children's rights has led us to  
 10 conclude that there is still progress to be made. We  
 11 heard clear frustrations from stakeholders about the  
 12 pace at which the measure has influenced policy and  
 13 spending. There is a lack of reference to children's  
 14 rights in key strategic documents and insufficient  
 15 evidence that the duties in the measure are being  
 16 considered and exercised across the whole of the Welsh  
 17 Government. Some of the tools ..."  
 18 I think you have just described the children's  
 19 rights impact assessments are produced far too late in  
 20 the policy development process:  
 21 "This demonstrates to us that children's rights are  
 22 not driving the Welsh Government's decision-making as  
 23 the legislation intended."  
 24 Danny, thank you, that can come down.  
 25 I think there's still quite a lot to be done,

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1 I suppose, would be the sort of takeaway, possibly, from  
 2 this report. Would you agree with that, Mr Heaney?  
 3 **A. Yes, and the Deputy Minister for Health and**  
 4 **Social Services has responded to that report, accepted**  
 5 **many of the recommendations. I know one of those**  
 6 **recommendations is in relation to publicising the**  
 7 **children's rights impact assessment. Since the**  
 8 **beginning of January of this year, our Welsh Government**  
 9 **is publicising all of those. That will also ensure**  
 10 **transparency but ensure some of those issues around**  
 11 **timeliness. The Welsh Government is absolutely**  
 12 **committed to ensuring that children's rights are**  
 13 **incorporated within our policy making.**  
 14 **One of the policy challenges often within**  
 15 **governments is ensuring that impact assessments are**  
 16 **completed at the beginning of a journey, and that is**  
 17 **very much where the Welsh Government subscribes, so**  
 18 **there has been a positive response to this inquiry**  
 19 **report and we are looking to strengthen -- there are**  
 20 **other areas that, you know, I think that it has made**  
 21 **a difference and I think it's important to say that.**  
 22 **So, you know, I think, whilst we recognise the**  
 23 **challenges and the journey to go, we know that the**  
 24 **Equality and Human Rights Commission looked at this,**  
 25 **commissioned research on it. Whilst they recognise some**

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1 **of the challenges that this report clearly highlights,**  
 2 **they recognise that the measure had resulted in greater**  
 3 **visibility for children's rights in policy processes**  
 4 **undertaken by ministers and officials.**  
 5 They also said -- found in this research, you know,  
 6 it had a positive impact on the way policy is being  
 7 undertaken by the Welsh Government. Importantly, they  
 8 say the duty, the regard, you know, duty has established  
 9 a new framework for policy development, which gives  
 10 greater attention and visibility.  
 11 So whilst, yes, we accept that there is a journey to  
 12 go on and that Welsh ministers have committed to that  
 13 journey, I think it's already been a good stepping  
 14 stone. So having that legislation I think is a very  
 15 good, purposeful -- indeed, young people have told us  
 16 themselves that they have also resulted in increased  
 17 opportunities to engage with ministers in the Senedd and  
 18 to be involved in that process as a part of this measure  
 19 as well.  
 20 Q. I think one of the suggestions is that children are able  
 21 to engage more actively with the Welsh Government.  
 22 That's one of the suggestions that comes out of it.  
 23 I think the point that the Children's Commissioner  
 24 makes is that it mustn't sort of -- there might be  
 25 a degree of complacency because Wales has actually put

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1 a measure into domestic law and it shouldn't be the  
 2 high-water mark. But I think, Mr Heaney, am I right,  
 3 that we can see that this is a call to arms the Welsh  
 4 Government are certainly considering?  
 5 **A. I think, you know, one of the things that's important,**  
 6 **and in an inquiry like this we learn from your findings**  
 7 **and from -- I think, you know, at one level, you know,**  
 8 **you can always look at, have you got good procedures and**  
 9 **practice in place? Have you got All Wales procedures?**  
 10 **And we can say yes.**  
 11 **The important area, then, is always how you**  
 12 **translate that into the culture of how practice is and**  
 13 **how it takes place, and that is as appropriate for Welsh**  
 14 **Government practice as it is for anyone else's practice.**  
 15 **So I certainly know that we are not complacent and see**  
 16 **very much that there is, you know, much benefit to be**  
 17 **gained to listening and learning from children and young**  
 18 **people and their experiences and understanding the past**  
 19 **to inform us in terms of what we need to do for the**  
 20 **future.**  
 21 Q. Thank you, Mr Heaney. I would like to turn now to the  
 22 Keeping Learners Safe guidance which we looked at, at  
 23 the beginning, in relation to the section 130 duty. So  
 24 this is the guidance which you issue under the  
 25 Education Act 2002, so separate guidance has been issued

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1 from England in relation to that.  
 2 There was a 2015 version, I think, and recently the  
 3 2020 version, which we have just seen. We looked at  
 4 this a little bit in relation to the section 130, but  
 5 I don't know, can you help us with why -- so we have the  
 6 "should" -- we have the "must" and the "should" in the  
 7 guidance and we have the "effective practice". Why was  
 8 the decision made to have a sort of third level in the  
 9 guidance, which is "effective practice"?  
 10 **A. I think it was just by working together with colleagues**  
 11 **that it was felt to be an important area and to be taken**  
 12 **forward, so it was clearly within a Welsh context, that**  
 13 **was felt to be the right way to go. As I have said**  
 14 **earlier, we will take very much from these conversations**  
 15 **and learning from the inquiry whether, you know, that is**  
 16 **something that is helpful. We believe, at the moment,**  
 17 **that Keeping Learners Safe has been very positively**  
 18 **received. We have refreshed it and gone back out to the**  
 19 **sector and had discussions. We are looking at training**  
 20 **to support the practice around that.**  
 21 **So I think, you know, in this conversation, I think**  
 22 **it is really important that I don't, you know, lose**  
 23 **sight of the fact that, you know, Keeping Learners Safe**  
 24 **I think is a really good document. I think it's really**  
 25 **good in terms of the clarity that it brings and some of**

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1 **the expectations, and it is, of course, a statutory**  
 2 **document as well.**  
 3 Q. I think it contains a specific section now on  
 4 peer-on-peer abuse --  
 5 **A. Yes.**  
 6 Q. -- or harmful sexual behaviour between children. If we  
 7 could perhaps have a look at that. Danny, could you get  
 8 up INQ006375\_042. This is the most recent version,  
 9 Mr Heaney, of Keeping Learners Safe. I think if we  
 10 could go to the bottom half, Danny, please,  
 11 "Peer-on-peer abuse". This is something in particular  
 12 that we were looking at in phase 1 of this  
 13 investigation, Mr Heaney, but it is obviously something  
 14 which continues. You have put in some guidance, but  
 15 I think you signpost people to much more specific  
 16 guidance; is that right? Is that how this document  
 17 works? It has an overview and then you signpost  
 18 schools, local authorities, governing bodies, to more  
 19 specific guidance on these issues?  
 20 **A. Yes, indeed. We have commissioned additional work. We**  
 21 **commissioned work guidance by NSPCC Cymru, Barnardo's**  
 22 **Cymru. That was, in a sense, a practice guide in**  
 23 **managing cases of peer abuse. The importance of that**  
 24 **work is that, you know, the co-production of**  
 25 **working together with partners and young people's**

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1 accordance with guidance. There should be a designated  
 2 governor. You talk about headteachers and principals of  
 3 all schools and colleges have responsibility for  
 4 ensuring that all staff are aware of child protection  
 5 policies and procedures. And schools and colleges -- so  
 6 it is not a DSL in Wales, it is a DSP; is that right?  
 7 **A. Yes, it is.**  
 8 Q. So those are the basic -- we recognise those  
 9 responsibilities. Danny, if we could go down to  
 10 paragraph 118 on that page. We have talked about this,  
 11 that schools are required to notify local authorities  
 12 when allegations of child sexual abuse are made in line  
 13 with guidance, but it says they are not required to  
 14 notify the Care Inspectorate Wales, Estyn or the Welsh  
 15 Government. We have been told by the inspectorates in  
 16 Wales that it would be useful to them if schools were to  
 17 report incidents to them. Is this something that the  
 18 Welsh Government has considered?  
 19 **A. Yes. This is something, you know, that's very**  
 20 **interesting. We understand the issue that Estyn are**  
 21 **raising. It's a very helpful point to make. We would**  
 22 **want to look at arrangements where they are notified**  
 23 **appropriately and therefore have that information as**  
 24 **part of their inspection process. So that is something**  
 25 **that we do intend to take forward from this particular**

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1 **experiences to ensure that the attention is -- and the**  
 2 **support provided by the professionals pays due regard to**  
 3 **child victims' needs, support for their parents, support**  
 4 **for them, and also responds constructively and**  
 5 **supportively for those who display harmful behaviours,**  
 6 **to assist them and support them in, you know, change and**  
 7 **supporting their parents as well through a difficult**  
 8 **time.**  
 9 Q. I think, when we look at the national action plan, which  
 10 we will come on to do, we are told by Her Majesty's  
 11 chief inspector, Mr Rowlands, that there are some  
 12 concerns that some of the advice focuses on the  
 13 perpetrator, if you like, of harmful sexual behaviour  
 14 rather than the victim. We will deal with that,  
 15 perhaps, when we come to look at the national action  
 16 plan.  
 17 **A. Okay.**  
 18 Q. In your statement, you tell us about the guidance in  
 19 Keeping Learners Safe and the roles and responsibility  
 20 of staff. Danny, could we have a look at that, it's  
 21 WGT000476\_019. So this is your witness statement,  
 22 Mr Heaney, and at the top -- Danny, if we could just get  
 23 the bullet points at the top. Thank you very much.  
 24 So, "Governing bodies are accountable for ensuring  
 25 effective policies and procedures are in place ..." in

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1 **work that's emerged.**  
 2 Q. Is that going to be a consultation that will happen --  
 3 **A. Well, there's a number -- during the course of this**  
 4 **work, there was a number of areas, and, you know, we**  
 5 **have, unfortunately, and very sadly, had to deal with**  
 6 **COVID issues, and still are, today, in major work mode**  
 7 **around COVID response. It's a very challenging picture.**  
 8 **A lot of Welsh Government resources -- this is not an**  
 9 **excuse -- has had to deal with some of that. So there**  
 10 **are areas -- there are a number of areas where we would,**  
 11 **I believe, by now, already have developed and**  
 12 **progressed, but those have been delayed because of**  
 13 **the impact of COVID. So there is a number of work**  
 14 **streams that we have under way and in plan to strengthen**  
 15 **arrangements, and, again, one of the areas here is to**  
 16 **look at what arrangements could be in place that ensure**  
 17 **then inspectorates are well informed and not just**  
 18 **informed, you know, often -- either later when something**  
 19 **has gone wrong.**  
 20 Q. Danny, that can come down, thank you. The Wales  
 21 safeguarding procedures. You have referred to them  
 22 a little bit.  
 23 **A. Yes.**  
 24 Q. These launched in November 2019, I think.  
 25 **A. Yes.**

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1 Q. You tell us in your statement it was the first time in  
 2 a single document which set out the sort of procedures  
 3 for adults and children at risk to be safeguarded in  
 4 Wales.  
 5 **A. Yes.**  
 6 Q. They are available, I think, even as an app on a mobile  
 7 phone; is that right?  
 8 **A. Yes, there is. So practitioners have -- you know, this**  
 9 **is one of the developments using technology. We are**  
 10 **very clear we wanted practitioners to be able to access**  
 11 **the information, and therefore it's been developed.**  
 12 **Also, our partner, Social Care Wales, has all the**  
 13 **information publicly facing on their websites as well.**  
 14 Q. I suppose the question from this investigation's  
 15 perspective is, if I am a teacher in Wales and I'm  
 16 worried about a child being abused, do I look to Keeping  
 17 Learners Safe as my first port of call or do I look at  
 18 the Welsh safeguarding procedures?  
 19 **A. Well, I wouldn't suggest that they are separate and**  
 20 **opposed, because that was the whole point of us**  
 21 **refreshing Keeping Learners Safe, to make sure they were**  
 22 **aligned. So a very important point you raise. We**  
 23 **believe they're aligned.**  
 24 **You also have your designated senior person. There**  
 25 **are people that you know where to go to. So, you know,**

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1 **want it to be a living process, where everyone works**  
 2 **together as partners to safeguard children and young**  
 3 **people.**  
 4 Q. This is another area, actually, where Her Majesty's  
 5 chief inspector, Mr Rowlands, for Estyn is concerned  
 6 about an omission in respect of peer-on-peer abuse  
 7 procedures. I think his concern is, again, that the  
 8 guidance focuses wholly on how to manage the needs of  
 9 the perpetrator. That's something on which the Welsh  
 10 Government is sighted and is going to do something?  
 11 **A. I think we already have. I believe we have already**  
 12 **responded by the work that Barnardo's Cymru and NSPCC**  
 13 **Cymru have assisted us with. We are very clear that,**  
 14 **you know, support to victims of child sexual abuse is**  
 15 **critical. They need the right level of support, whether**  
 16 **that be therapeutic needs or understanding within**  
 17 **education establishments. They need to be looked at in**  
 18 **their own right and supported in their own right and**  
 19 **alongside their parents. So we believe very strongly**  
 20 **that that is already part of our particular culture.**  
 21 **I understand the comment about earlier guidance, but**  
 22 **I think, as we move forward with the guidance from**  
 23 **Barnardo's and NSPCC, I think that takes us a helpful**  
 24 **step forward in terms of our clarification.**  
 25 Q. Would that apply -- in Wales, you have a national action

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1 **for an educationalist, for a teacher in Wales, they will**  
 2 **know within their local education establishments who to**  
 3 **turn to, who will be able to advise them and who to get**  
 4 **that support from. It is really important that it is**  
 5 **not just left to individual determinations. The**  
 6 **guidance is -- you know, has been published. But it is**  
 7 **really about then ensuring through training, support and**  
 8 **the opportunity to have conversations about issues that**  
 9 **that gives greater support and confidence to our**  
 10 **educationalists, our teachers.**  
 11 Q. In practical terms, really, so you're not expecting  
 12 teachers to have the Wales safeguarding procedures on  
 13 their phone; you think that they should really be  
 14 looking to Keeping Learners Safe?  
 15 **A. Expectations -- for those that want to use the app,**  
 16 **then, you know, good professionals will always make**  
 17 **themselves as knowledgeable -- and knowledge is a great**  
 18 **asset to children and young people. The expectation is**  
 19 **that all educationalists are familiar with our**  
 20 **procedures, they know how to use them and know when to**  
 21 **use them -- that's where the training and support comes**  
 22 **in -- and know the mechanisms and the good processes**  
 23 **within local educational establishments to be able to**  
 24 **work through.**  
 25 **It's very difficult -- what you don't want -- you**

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1 plan for preventing and responding to child sexual  
 2 abuse, don't you?  
 3 **A. Indeed.**  
 4 Q. I know, Mr Heaney, that you have given evidence to the  
 5 inquiry for the investigation into institutional  
 6 responses to the sexual exploitation of children by  
 7 organised networks, so I'm not going to ask you  
 8 questions about that national action plan. But in the  
 9 evidence that we had in this investigation, again,  
 10 Her Majesty's Chief Inspector was concerned about the  
 11 emphasis -- the plan put, if you like, on the parents  
 12 and carers of those exhibiting harmful sexual behaviours  
 13 but not so much on the child victims. Does that also  
 14 come under -- has that moved on since we had the  
 15 statement in this inquiry?  
 16 **A. I believe that it has. I'm very much aware that**  
 17 **supporting children through the national action plan**  
 18 **work on preventing, protecting, supporting applies to,**  
 19 **equally, those that have been victims of abuse and those**  
 20 **who are displaying harmful behaviours.**  
 21 **The ten objectives and the actions that fall under**  
 22 **have continued to be developed at pace, and we will be**  
 23 **shortly publishing new guidance as well around child**  
 24 **sexual abuse. So from us, from our view, the majority**  
 25 **of the actions of the national plan focus on victims of**

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<p>1 <b>abuse, so I think that balance is there and that work is</b>                  2 <b>very much at the heart of what we want to achieve in</b>                  3 <b>Wales.</b>                  4 Q. Thank you, Mr Heaney. I'd like to turn now to the role                  5 of the Welsh Government in inspection and monitoring.                  6 We are going to be hearing evidence from Estyn and the                  7 Care Inspectorate Wales just after the break, so we are                  8 definitely not going to look into the detail. But                  9 I would like to look at the particular role that the                  10 Welsh Government has.                  11 Just very briefly, in summary, Estyn inspects the                  12 educational elements, so not the residential element,                  13 the educational elements, of all schools in Wales,                  14 doesn't it?                  15 <b>A. Yes, indeed.</b>                  16 Q. The Care Inspectorate Wales inspects the residential                  17 elements, so boarding schools, residential special                  18 schools and those dual-registered.                  19 <b>A. Yes.</b>                  20 Q. If we focus on your role, the Welsh Government's role,                  21 you are obviously responsible for primary and secondary                  22 legislation in respect of inspection and monitoring. So                  23 if we think about the Independent School Standards                  24 (Wales) Regulations 2003, they provide specific                  25 standards that Estyn must inspect against for</p> <p style="text-align: center;">Page 33</p>	<p>1 independent schools, don't they?                  2 <b>A. Yes.</b>                  3 Q. So the standards are, the quality of education, the                  4 spiritual, moral, social and cultural development of                  5 pupils, and the welfare, health and safety of pupils.                  6 Now, those standards in Wales haven't been reviewed                  7 since 2002, have they?                  8 <b>A. I can't confirm the year, because it's before my time,</b>                  9 <b>so apologies, counsel. But they haven't been reviewed</b>                  10 <b>in a length of time. But we are, and will be, reviewing</b>                  11 <b>them.</b>                  12 Q. Certainly from -- again, Her Majesty's Chief Inspector,                  13 in sort of moderate language, says it would be prudent                  14 to do so as soon as possible.                  15 <b>A. We had -- we are committed to reviewing those standards.</b>                  16 <b>We believe strongly, and I can assure the inquiry that</b>                  17 <b>there are areas to strengthen. We are aware of some of</b>                  18 <b>those areas that need to be strengthened, and we will</b>                  19 <b>and do plan to do so.</b>                  20 Q. So the statement we have from the Children's                  21 Commissioner for Wales says that she was invited to                  22 present information at a workshop on 31 March 2020.                  23 Now, that date will obviously be significant in a lot of                  24 people's minds because, of course, that was then                  25 cancelled because of restrictions to do with COVID-19.</p> <p style="text-align: center;">Page 34</p>
<p>1 Has that meeting now taken place, do you know,                  2 Mr Heaney?                  3 <b>A. I can't confirm whether that meeting has taken place.</b>                  4 <b>What I can confirm is that Welsh Government would have</b>                  5 <b>taken forward the actions and commitments that it has.</b>                  6 <b>I can confirm that we are committed to ensuring the</b>                  7 <b>review of those standards, and would have done so but</b>                  8 <b>for the very sad position that we found ourselves in in</b>                  9 <b>relation to responding to COVID.</b>                  10 Q. So it's very much on the agenda for sort of close                  11 legislative amendments?                  12 <b>A. Yes.</b>                  13 Q. It's on the front --                  14 <b>A. If you ask me to call it, I don't think that workshop</b>                  15 <b>has taken place, but I would just need to double-check,</b>                  16 <b>counsel.</b>                  17 Q. I think the main thing that Estyn thinks is necessary is                  18 a separate standard that refers to the quality of                  19 leadership and management.                  20 <b>A. Yes.</b>                  21 Q. We have heard a lot of evidence in this inquiry that                  22 leadership and management -- the quality of that can                  23 have a real impact on the safeguarding culture of                  24 a school and, indeed, whether processes are followed.                  25 So the absence of that standard -- I think the</p> <p style="text-align: center;">Page 35</p>	<p>1 Education Act 2008 brought a standard of that nature in                  2 in England, but there isn't anything of that -- about                  3 leadership and management in Wales at the moment, is                  4 there?                  5 <b>A. No, what we would want to do -- so I think there are</b>                  6 <b>a couple of things. One is, whilst we have good, strong</b>                  7 <b>safeguarding procedures, legislation, we need to</b>                  8 <b>strengthen the standards considerably around, you know,</b>                  9 <b>some of those areas you mentioned -- leadership -- and</b>                  10 <b>also we need to ensure, then, that, you know, where</b>                  11 <b>regulatory activity is required to ensure those</b>                  12 <b>standards are met, that we are able to enforce as well.</b>                  13 <b>So I think it's in part reviewing the standards as part</b>                  14 <b>of review, and we acknowledge that that standard yet is</b>                  15 <b>not in Wales, but we are certainly committed to</b>                  16 <b>considering that.</b>                  17 <b>My main point for this committee today is that one</b>                  18 <b>of the areas that we will be looking at across the whole</b>                  19 <b>is about where we change our procedures that strengthen</b>                  20 <b>around enforcement as well as having the safeguarding</b>                  21 <b>standards in place.</b>                  22 Q. I suppose they are linked, though, aren't they,                  23 Mr Heaney, because you can only enforce if the standards                  24 are not met. So if you don't have a standard, you can't                  25 do any enforcing, can you?</p> <p style="text-align: center;">Page 36</p>

1 **A. We do have standards. I would say that we do have**  
2 **standards. But we take, you know, the views of many of**  
3 **our partners into account and we know that we now need**  
4 **to strengthen those standards and create new ones, as**  
5 **you say, where required, learning from England and**  
6 **others.**  
7 Q. Indeed, I think we heard evidence from Her Majesty's  
8 Chief Inspector in England about the need not just --  
9 they have the leadership and management standard, but  
10 they are also looking for a standard which is to do with  
11 governance, sort of open and transparent governance, so  
12 that proprietor-led schools -- so, yes, there are  
13 a number of things which could be improved, I think, in  
14 terms of --  
15 **A. I can confirm to the committee we will be undertaking**  
16 **a comprehensive review of the standards.**  
17 Q. In Wales, Estyn, I think, is -- also thinks that the  
18 need for a DBS check for proprietors, the Independent  
19 School Standards need to be strengthened, don't they, so  
20 that it is carried out every three years, because  
21 there's concern that a proprietor gets a DBS check, they  
22 don't tell you that there's been a change in proprietor,  
23 and then there's no DBS check. Again, is that something  
24 which the Welsh Government is considering actively at  
25 the moment?

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1 **A. It is.**  
2 Q. Then if we could look at the National Minimum Standards.  
3 The National Minimum Standards for residential special  
4 schools and for boarding schools. Again, these date  
5 from 2003, so they're 17 years old. Again, the  
6 information we have from the Care Inspectorate Wales,  
7 they don't say "prudent to change", what they say is  
8 they are outdated and not aligned to current models of  
9 education, care or support. Perhaps, Mr Heaney, you  
10 could tell us what the Welsh Government's intentions are  
11 in terms of the National Minimum Standards?  
12 **A. Well, with the National Minimum Standards, our intention**  
13 **is to talk with our inspection partners -- Estyn, CIW --**  
14 **to look at what action we need to take. As you will**  
15 **have seen, there are a number of areas where we have**  
16 **tried to modernise from Social Services and Well-being**  
17 **(Wales) Act to bring it into All Wales procedures and**  
18 **there is a natural link then to making sure there are**  
19 **standards. There are many who think calling things**  
20 **"National Minimum Standards" is probably the wrong**  
21 **language in terms of how we approach things as well, so**  
22 **I think, from the inspectorate viewpoint, I'm well aware**  
23 **that they believe these are just the minimum of**  
24 **requirements and there may be some particular learning**  
25 **that we need to do in our revisions and refreshment.**

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1 **But I would certainly want to share with the**  
2 **committee that, you know, we have been actively updating**  
3 **and working on strengthening our safeguarding**  
4 **arrangements.**  
5 Q. The Care Inspectorate Wales has got particular concerns  
6 about residential special schools, where the pupils are  
7 there for under 295 days. So if they are there for over  
8 295 days, it's registered under the 2014 Act as a care  
9 home. But if it is not -- if the children aren't there  
10 for 295 days, then they are subject to the National  
11 Minimum Standards. They say in their witness statement  
12 that the Welsh Government was already considering  
13 removing the 295-day exception. Can you update us about  
14 that, Mr Heaney? Has that exception been removed?  
15 **A. No, because of the position that we have had with our**  
16 **COVID response. I think it's really important that, you**  
17 **know, the inquiry is aware that a lot of our resources**  
18 **have had to naturally respond to the COVID crisis that**  
19 **we have faced. You know, and I -- you know, I'm always,**  
20 **you know, pleased to come to committee, to the inquiry,**  
21 **to share and to give evidence and to learn. We are**  
22 **committed to bringing that piece of legislation up to**  
23 **date, in terms of, you know, we actually think very**  
24 **strongly that 295 days is now an artificial day and they**  
25 **should be aligned to the new legislation, the regulation**

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1 **inspection of Social Care Wales Act 2016.**  
2 **So what we are looking to do, what our intention is,**  
3 **is to align that with that new legislation and to remove**  
4 **the 295 days to create a situation where it is just**  
5 **a regulated service.**  
6 **What difference does that make? Well, I think it**  
7 **makes a big difference in terms of --**  
8 Q. Sorry, Mr Heaney, I'm going to stop you. We don't have  
9 very much time. I'm actually going to be looking into  
10 that with the Care Inspectorate Wales in the next  
11 session, so if I could just stop you there.  
12 So the Welsh Government, you are the registration  
13 authority and the regulator of independent schools in  
14 Wales; is that right?  
15 **A. Yes.**  
16 Q. I think from your statement I understand that the Welsh  
17 Government has not intervened or taken regulatory action  
18 in respect of any independent school in the last ten  
19 years; is that right?  
20 **A. I think we haven't -- I think it depends how you look at**  
21 **intervention, because Welsh Government has, on a number**  
22 **of occasions, asked the inspectorate to inspect, to go**  
23 **in. There's been focused visits, a number of focused**  
24 **visits. We have required 53 schools to produce action**  
25 **plans in the last five years, that is, alone. So**

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1 **I think Welsh Government has been active.**  
 2 **What Welsh Government, quite rightly, as you say,**  
 3 **hasn't done -- I know we have no time now -- is has not**  
 4 **deregistered, so they haven't withdrawn registration,**  
 5 **because there are steps that have been taken before that**  
 6 **really important point.**  
 7 Q. I think, again, Estyn thinks there is scope, perhaps,  
 8 for a wider range of enforcement powers where you could  
 9 perhaps step in where the governors of an independent  
 10 school, for example, are not exercising their role. Is  
 11 that something, again, that's on the Welsh Government's  
 12 list?  
 13 **A. It is. It is indeed.**  
 14 Q. Just briefly, to cover, lastly, a few things which have  
 15 come up, independent schools are not -- the teachers in  
 16 independent schools are not required to register with  
 17 the Education Workforce Council, are they?  
 18 **A. No, and indeed there's a lot of actions that have to be**  
 19 **done because, you know, you're quite right. The**  
 20 **Education Workforce Council provides a really important**  
 21 **role. There is improvements taking place throughout the**  
 22 **consultation on interim suspension orders. That**  
 23 **consultation closes in December. But in terms of**  
 24 **registration, clearly, one of our intentions is to**  
 25 **review that with a view to strengthening registration**

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1 THE CHAIR: Mr Frank?  
 2 MR FRANK: No, thank you.  
 3 THE CHAIR: And Sir Malcolm?  
 4 PROF SIR MALCOLM EVANS: No, thank you, chair.  
 5 THE CHAIR: I have no questions either. Thank you very  
 6 much, Mr Heaney.  
 7 **A. Thank you very much, inquiry, Professor Jay, for**  
 8 **inviting me today. Thank you.**  
 9 MS BICARREGUI: Thank you, Mr Heaney.  
 10 (The witness withdrew)  
 11 MS BICARREGUI: Chair, would it be a good time to have  
 12 a break now?  
 13 THE CHAIR: Yes, we will do that and return at 11.45 am.  
 14 Thank you.  
 15 (11.30 am)  
 16 (A short break)  
 17 (11.45 am)  
 18 THE CHAIR: Ms Bicarregui?  
 19 MS BICARREGUI: Thank you, chair. We are now going to be  
 20 hearing evidence concurrently from Estyn and from the  
 21 Care Inspectorate Wales.  
 22 Good morning, Mr Rowlands. Could you give your name  
 23 and job title, please?  
 24 MR ROWLANDS: Meilyr Rowlands, Her Majesty's Chief Inspector  
 25 for Education and Training in Wales.

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1 **with the Education Workforce Council.**  
 2 Q. There is a bit of a gap at the moment, I would suggest,  
 3 Mr Heaney. The Independent School Standards need  
 4 revising, the National Minimum Standards need looking  
 5 at. If I'm a teacher in an independent school, I'm not  
 6 subject to the section 130 duty, and I'm not required to  
 7 register with the Education Workforce Council, so it is  
 8 fair to say there is a fairly large gap at the moment,  
 9 isn't there, in regulation of independent schools in  
 10 Wales?  
 11 **A. Well, I think what I have said today is, I've openly**  
 12 **shared with the inquiry there are considerable important**  
 13 **areas that we wish to strengthen, but I do cite that we**  
 14 **have got very clear procedures and expectations and I've**  
 15 **referenced Keeping Learners Safe as statutory guidance**  
 16 **that applies to the independent schools as well.**  
 17 **So, yes, there are key areas that we have to**  
 18 **strengthen and develop. But that's within a frame of**  
 19 **good areas and some good practice as well.**  
 20 MS BICARREGUI: Thank you. Mr Heaney, I don't have any  
 21 further questions for you. Chair, I don't know if you  
 22 or the panel have any questions for Mr Heaney?  
 23 THE CHAIR: Thank you, Ms Bicarregui. Ms Sharpling, do you  
 24 have any questions?  
 25 MS SHARPLING: No, thank you, chair.

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1 MS SCOTT: Jassa Scott, strategic director with Estyn, the  
 2 inspectorate for education and training in Wales. Good  
 3 morning.  
 4 MS BICARREGUI: Good morning. Ms Poole, could I ask you to  
 5 do the same?  
 6 MS POOLE: Good morning. I am Vicky Poole. I'm the deputy  
 7 chief inspector for Care Inspectorate Wales.  
 8 MS BICARREGUI: Thank you. Mrs Roberts, could I ask you to  
 9 do the same, please?  
 10 MS ROBERTS: Good morning. I'm Lesley Roberts. I'm the  
 11 senior manager for children's services and younger  
 12 adults in Care Inspectorate Wales.  
 13 MR MEILYR ROWLANDS (affirmed)  
 14 MS JASSA SCOTT (affirmed)  
 15 MS VICKY POOLE (affirmed)  
 16 MS LESLEY ROBERTS (affirmed)  
 17 Examination by MS BICARREGUI  
 18 MS BICARREGUI: Before we start questions, just a few  
 19 introductory remarks. This isn't a test of memory.  
 20 There are a lot of documents associated with the  
 21 evidence that you are giving. So you should have  
 22 a bundle in front of you. Danny, our evidence handler,  
 23 will also get information on the screen if we need it.  
 24 So that might take a few minutes to arrive. So bear  
 25 with us.

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1 If we lose any of you, don't worry, we will get you  
 2 back again. It won't have escaped your attention that  
 3 there are four of you, so when I'm asking questions,  
 4 I will always try and remember to direct my question to  
 5 one of you in particular. If it is the wrong person,  
 6 then feel free to say that and pass the question to  
 7 somebody else, but hopefully, mostly, it will be  
 8 directed towards the right person.  
 9 I'm going to ask questions, and then, when I have  
 10 finished, I will hand over to the chair and panel.  
 11 Thank you very much for coming, and thank you for  
 12 your witness statements. I am not going to be going  
 13 through them line by line, but I would just like to  
 14 check with you -- Ms Poole, can you look at tab A1 in  
 15 the bundle in front of you. That should be your first  
 16 witness statement. That's the witness statement we will  
 17 be concentrating on this morning.  
 18 MS POOLE: Okay.  
 19 MS BICARREGUI: Is that witness statement still true, to the  
 20 best of your knowledge and belief?  
 21 MS POOLE: It is.  
 22 MS BICARREGUI: Mrs Roberts, could you have a look at A3 in  
 23 the bundle. That should be your witness statement.  
 24 I would like you to confirm that its contents are still  
 25 true, to the best of your knowledge and belief?

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1 Her Majesty's Chief Inspector for Education and Training  
 2 in Wales, and I think you have had that role since 2015;  
 3 is that right?  
 4 MR ROWLANDS: Yes.  
 5 MS BICARREGUI: But you joined Estyn in 1999, so you've been  
 6 involved in inspections in Wales for a considerable  
 7 period of time?  
 8 MR ROWLANDS: Yes.  
 9 MS BICARREGUI: Just briefly, Estyn isn't an acronym, is it?  
 10 Could you tell us what it means, please?  
 11 MR ROWLANDS: It means to stretch or to help and support, so  
 12 it's got a combination of meanings.  
 13 MS BICARREGUI: Thank you very much. Ms Scott, could you  
 14 tell us your role at Estyn? I know you have told us,  
 15 but briefly your professional background?  
 16 MS SCOTT: Yes. I am the strategic director. There's two  
 17 strategic directors in Estyn, so I have responsibility  
 18 for -- I work with independent schools, local  
 19 authorities, some other sectors. I also have overall  
 20 responsibility for safeguarding in the organisation, and  
 21 I've been with Estyn since 2007, where I inspected  
 22 across a range of sectors and, prior to that, I worked  
 23 in local authority and in school.  
 24 MS BICARREGUI: Thank you very much. Ms Poole, you have  
 25 told us you are the deputy chief inspector of the Care

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1 MS ROBERTS: I do.  
 2 MS BICARREGUI: Thank you. Mr Rowlands, you have also given  
 3 us two statements for this particular phase. But we are  
 4 going to be looking at one of those. So your statement  
 5 should be at tab A4. Did you sign that statement,  
 6 Mr Rowlands?  
 7 MR ROWLANDS: Yes, I did.  
 8 MS BICARREGUI: Is it still true, to the best of your  
 9 knowledge and belief?  
 10 MR ROWLANDS: Yes, it is.  
 11 MS BICARREGUI: Ms Scott, I think at tab A6 you should have  
 12 your statement. Did you sign that statement?  
 13 MS SCOTT: I did.  
 14 MS BICARREGUI: Is it still true, to the best of your  
 15 knowledge and belief?  
 16 MS SCOTT: It is.  
 17 MS BICARREGUI: Chair, as you can imagine, there is a great  
 18 deal of detail in these witness statements, so I would  
 19 like to ask permission for these to be adduced in full.  
 20 Thank you.  
 21 Just for the avoidance of doubt, those statements  
 22 are CIW000048, CIW000055, ETN000736 and ETN000770.  
 23 Right. We are done, everyone. I will start asking you  
 24 some questions.  
 25 Mr Rowlands first. We heard that you are

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1 Inspectorate Wales. I think you were appointed in 2018.  
 2 Is that right?  
 3 MS POOLE: No, 2014.  
 4 MS BICARREGUI: 2014, thank you. Could you briefly describe  
 5 to us your professional background?  
 6 MS POOLE: My professional background is I'm a registered  
 7 mental nurse by background, but I've worked in social  
 8 care services for a long time. I'm one of two deputy  
 9 chief inspectors in Care Inspectorate Wales and my  
 10 responsibility is the inspection of regulated services,  
 11 early years in play and adult and children services, and  
 12 the inspection of local authorities.  
 13 MS BICARREGUI: Thank you very much. Mrs Roberts, you have  
 14 told us you are the senior manager for the children and  
 15 younger adult services inspection team. Could you tell  
 16 us briefly your professional background, please?  
 17 MS ROBERTS: Yes, I will give you a quick plotted history.  
 18 I started my career in 1978 as a teacher in a special  
 19 education school. I worked within education for  
 20 14 years and then I had a career change and went to work  
 21 in social care. I am a trained social worker and I have  
 22 worked in social care now since 2013 and have held  
 23 various positions within social care, including a head  
 24 of a local authority safeguarding service. I have also  
 25 worked as a regulatory inspector and I have been in CIW

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1 now since 2013 and been in my current post for three  
 2 years.  
 3 MS BICARREGUI: Thank you very much, Mrs Roberts.  
 4 Mr Rowlands, Estyn is responsible for the inspection of  
 5 the quality and standards of education and training in  
 6 all schools in Wales; that's right, isn't it?  
 7 MR ROWLANDS: Yes, it is.  
 8 MS BICARREGUI: We heard from Mr Heaney this morning there  
 9 are no academies or free schools in Wales, so  
 10 essentially it is maintained schools and independent  
 11 schools; is that right?  
 12 MR ROWLANDS: Yes, it is. We inspect other sectors as well,  
 13 pupil referral units, FE colleges, and so on.  
 14 MS BICARREGUI: We will go into this in more detail, but  
 15 when you inspect an independent school, you use your  
 16 common inspection framework to look at the school, but  
 17 you also have to inspect against the Independent School  
 18 Standards; is that right?  
 19 MR ROWLANDS: Yes, that's correct.  
 20 MS BICARREGUI: Again, we will look at the Independent  
 21 School Standards, but just very briefly, I think it is  
 22 your evidence that a standard about leadership -- not  
 23 having a standard about leadership and management limits  
 24 your ability to follow up with independent schools when  
 25 there are shortcomings; is that right?

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1 top part of the second page, that would be great.  
 2 Ms Scott, could you tell us a little bit how  
 3 safeguarding is inspected across these three areas,  
 4 please?  
 5 MS SCOTT: Absolutely. You're correct in identifying we  
 6 look at it largely across three areas. Inspection  
 7 area 2 looks at learner well-being, and that's looking  
 8 actually at the outcomes for learners in terms of  
 9 well-being. And we use our pupil questionnaires that we  
 10 ask pupils to complete prior to an inspection to help  
 11 inform that, as well as talking to learners during an  
 12 inspection and looking at work and hearing about their  
 13 experiences within school.  
 14 In inspection area 4, which is about care, support  
 15 and guidance, we look at it in a couple of ways.  
 16 There's a section on safeguarding, and within that we do  
 17 look at child protection as a subsection of that, but we  
 18 also look at, broadly, how the school promotes that  
 19 culture of safeguarding, how it builds children's  
 20 knowledge and understanding of how to keep themselves  
 21 safe, how to behave responsibly with others, a focus on  
 22 children's rights, for example, respect and tolerance  
 23 and things like that, as well as the support it puts in,  
 24 perhaps, where children need it, how children can raise  
 25 concerns, those kind of things. So that's the bulk of

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1 MR ROWLANDS: Yes. I think we think that the standards  
 2 should generally be updated, I think, in lots of ways,  
 3 but that is a particular area that we think is really  
 4 important. You know, we'll be talking later about the  
 5 culture, the safeguarding culture, and the culture more  
 6 generally in a school, and that's very much related to  
 7 leadership, so I think the standards -- we can work  
 8 around the standards, but it would make our life much  
 9 easier and make it much clearer if the standards helped  
 10 the process, and having something on leadership and  
 11 management would make it clearer where those  
 12 responsibilities lie.  
 13 MS BICARREGUI: Thank you. When you say you can work around  
 14 them, is that because you have your common inspection  
 15 framework which has a range of things to look at?  
 16 MR ROWLANDS: Yes, indeed. And you can use some of  
 17 the current standards as well.  
 18 MS BICARREGUI: Thank you. Ms Scott, the 2017 common  
 19 inspection framework looks at safeguarding in a number  
 20 of areas, I think. Danny, if we could get up  
 21 ETN000736\_012-013. I think, Ms Scott, this is  
 22 Mr Rowlands' witness statement which sets out the  
 23 standards. There are inspection areas 2, 4 and 5,  
 24 I think, which all touch on safeguarding. We can see it  
 25 on the second page. Danny, if you could highlight the

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1 where we look at safeguarding in inspection area 4.  
 2 In more recent years, we have strengthened the focus  
 3 on safeguarding in inspection area 5 as well, which is  
 4 about leadership and management. This is something that  
 5 was strengthened in 2017. So now it is clearer that, if  
 6 there are any shortcomings, or we have any concerns  
 7 about leadership and management, there can be an impact  
 8 within inspection area 5.  
 9 In the guidance that we are developing currently,  
 10 which will be from September '21, we have taken that  
 11 another step further under inspection area 5, so it  
 12 actually does talk about culture more and it also talks  
 13 about the evaluative processes that leaders and managers  
 14 use to assure themselves that the policies and  
 15 procedures they put in place work.  
 16 So since 2010, really, we have continued to  
 17 strengthen at each stage how we focus on safeguarding.  
 18 For example, in 2012, we introduced a safeguarding  
 19 self-evaluation form that a provider needs to use before  
 20 an inspection, or they can use something else that gives  
 21 us a similar assurance, but that needs to be signed off  
 22 at a governor level. So that's part of us trying to  
 23 emphasise, as part of the inspection process, the  
 24 importance of safeguarding and the need for leaders and  
 25 managers in a school to take ownership of it and to take

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1 it seriously, really.  
 2 MS BICARREGUI: Danny, that can come down, thank you.  
 3 Ms Scott, you just told us that part of  
 4 the leadership and management was ensuring not only that  
 5 safeguarding policies exist, which is obviously  
 6 necessary, but that the staff know the detail of those  
 7 and they're actually being implemented. How is that  
 8 kind of work done at inspection? Is that the  
 9 self-evaluation that you think will tell you that or is  
 10 that when you're actually there during the inspection?  
 11 MS SCOTT: There's some element of that in the safeguarding  
 12 self-evaluation form, but the important part of that is  
 13 that, as part of any inspection that we do of a school,  
 14 we talk to a range of staff across a school and ask them  
 15 about their understanding of their safeguarding  
 16 responsibilities, so practically -- usually, they have  
 17 a good understanding of those, they know what to do if  
 18 someone raises a concern, they know what to do if that  
 19 concern is about another member of staff, et cetera,  
 20 et cetera.  
 21 If they don't, then that would probably heighten the  
 22 focus that we'd give to safeguarding during an  
 23 inspection. That would be one of the triggers that  
 24 would probably lead us to dig deeper.  
 25 There would be a number of other things that would

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1 so we do annual monitoring visits for independent  
 2 special schools currently, and obviously we do do  
 3 focused visits. So, for example, if there is  
 4 a particular concern and we go and do a focused visit  
 5 and that concern is relating to safeguarding, then  
 6 typically that would mean that we're spending maybe kind  
 7 of the equivalent of four inspector days, three or four  
 8 days, looking at that very specific issue.  
 9 So, on a core inspection, I'd say it probably  
 10 equates to about a day of inspector time, as well as all  
 11 inspectors doing little bits as well, as in, if they're  
 12 having a conversation with a member of staff, asking  
 13 about training and things. So there's sort of a day of  
 14 focused activity with a bit of gathering from other  
 15 inspectors too.  
 16 MS BICARREGUI: You mentioned that there's a pupil  
 17 questionnaire which is part of the inspection process.  
 18 I know from your statement that, on that questionnaire,  
 19 there is -- it says if the pupil feels unsafe at school,  
 20 they're encouraged to -- I think it says talk to an  
 21 adult they trust, but it also says talk to Estyn and  
 22 there is a number and an email for Estyn. You may not  
 23 know this because it is not in your witness statement,  
 24 but do you have information about that service being  
 25 used by children? Have there been children who have, as

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1 also do that. So the questionnaires we used beforehand,  
 2 if staff or pupils or parents raise any concerns in  
 3 those around safeguarding, again, that would trigger us  
 4 to do -- go into slightly more depth.  
 5 But the other things that we'd routinely do on an  
 6 inspection would be to look at the training records to  
 7 see when staff have last received training, we'd look at  
 8 reports to governors to see whether there are examples  
 9 that safeguarding is being talked about at that level  
 10 and that governors are aware of safeguarding, and then  
 11 we'd look at, obviously, the policies and procedures as  
 12 well and check that they do what they're meant to do.  
 13 MS BICARREGUI: How long, typically, would your inspectors  
 14 be on site? How long do you have to do this?  
 15 MS SCOTT: In a core inspection, they're on site for three  
 16 days, and for an independent school -- it would depend  
 17 on the size of the school, but typically that would be  
 18 a team of four to six inspectors, maybe three in the  
 19 very smallest independent schools which would only have  
 20 a couple of pupils, maybe. Typically, within that, I'd  
 21 say probably a day of inspector time, a whole day, would  
 22 be committed particularly to looking in on these  
 23 safeguarding aspects, as opposed to looking across the  
 24 board.  
 25 We do do other activities with independent schools,

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1 a result of that, called Estyn or emailed Estyn?  
 2 MS SCOTT: It tends to be used more by parents. We have had  
 3 one or two parents over the years. I can't recall an  
 4 example where a child has, but we have had a number of  
 5 examples where children have made statements on their  
 6 questionnaire that have caused us concern.  
 7 Now, they're anonymous at the moment, but clearly  
 8 we'd act upon that. So we did have a couple recently in  
 9 a survey we'd done as part of a wider piece of work, not  
 10 with an individual school, and we were able to pass that  
 11 on to the local authority in broad terms, so that at  
 12 least they could go to the school and follow it up, even  
 13 though we didn't know who the individual was.  
 14 Obviously, prior to some school inspections, we have  
 15 made referrals to local authorities on the back of  
 16 something that's been said in those questionnaires.  
 17 MS BICARREGUI: Thank you very much. I think we can deal  
 18 quite briefly with the Independent School Standards.  
 19 Mr Rowlands, we touched on this, and your view, I think  
 20 very clearly expressed, is that the whole of  
 21 the Independent School Standards need to be reviewed  
 22 now. It's been a long time since they were last looked  
 23 at. Is that fair?  
 24 MR ROWLANDS: Yes. Yes, indeed.  
 25 MS BICARREGUI: I don't know if you heard, but I had

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1 a conversation with Mr Heaney this morning, where he  
 2 said that that was something which the Welsh Government  
 3 had in mind. How quickly do you think this needs to be  
 4 done? Is this a safeguarding problem, as such, or do  
 5 you think it is more just that it is time that it needs  
 6 to be done?  
 7 MR ROWLANDS: I think, as you know, we have made several  
 8 suggestions about how the system can be improved, and  
 9 I think none of those are absolutely decisive in  
 10 themselves, with the possible exception of  
 11 the registration by EWC. But they all add up to  
 12 a stronger system. So I think, you know, we would be  
 13 glad to see it happen.  
 14 I think our concern is that you can review these at  
 15 different levels, so, you know, I think regulations  
 16 could change some of the standards, but in order to have  
 17 an in-depth review of them -- and, for example, adding  
 18 an extra standard would require primary legislation and  
 19 clearly that will take longer. But I think it's still  
 20 worth doing that.  
 21 MS BICARREGUI: Thank you very much, Mr Rowlands. Ms Poole,  
 22 turning to the Care Inspectorate Wales, you inspect all  
 23 residential schools in Wales, I think, so boarding  
 24 schools and residential special schools; is that right?  
 25 MS POOLE: We do, yes.

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1 a residential special school but the children are there  
 2 for less than 295 days, then, at the moment, you don't  
 3 regulate them, you inspect them against the National  
 4 Minimum Standards for residential special schools.  
 5 MS POOLE: We do. As we have been clear in the statement,  
 6 that's an anomaly that we think needs to be corrected.  
 7 MS BICARREGUI: I don't know if you heard Mr Heaney. He  
 8 suggested that was, again, something that the Welsh  
 9 Government was considering changing. But, as far as  
 10 you're aware, is that something which there have been  
 11 recent discussions with you about?  
 12 MS POOLE: There were discussions up until the pandemic  
 13 commenced, and then that piece of work has had to be put  
 14 on hold. The team looking at that, the same team in  
 15 Welsh Government looking at care homes generally. So  
 16 it's on hold. It's definitely something we are looking  
 17 at; as it being a specific category under the 2016 Act.  
 18 MS BICARREGUI: For residential special schools registered  
 19 under -- I don't know, can I recall it RISCA?  
 20 MS POOLE: Yes.  
 21 MS BICARREGUI: RISCA. And there are regulations which  
 22 underpin that. You tell us that the requirements there  
 23 represent a move away from National Minimum Standards  
 24 towards outcome-focused requirements. Can you give us  
 25 a little bit of detail about what you mean by that?

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1 MS BICARREGUI: Thank you. Danny, could we get up  
 2 CIW000048\_006, please. Ms Poole, this is a table which  
 3 sets out primarily the education services. I know you  
 4 have a broader range of services that you look at, but  
 5 just focusing on the ones that this particular  
 6 investigation is looking at. So the school sector.  
 7 This describes, I think, the way in which -- the way you  
 8 inspect or regulate differs. If we could just quickly  
 9 have a look at this. For residential special schools,  
 10 your role depends on whether pupils are accommodated for  
 11 more than 295 days at the moment; is that right?  
 12 MS POOLE: It does, yes.  
 13 MS BICARREGUI: We can see here that if they are  
 14 accommodated for more than 295 days, at the top box,  
 15 they are then regulated by you. They are not just  
 16 inspected, they are regulated, under the Social Care  
 17 Wales Act. Is that right?  
 18 MS POOLE: Yes, under the Regulation and Inspection of  
 19 Social Care (Wales) Act, yes. They are regulated as  
 20 a care home. What happened with the 2016 Act is all --  
 21 children's homes became care homes. It's the same set  
 22 of regulations whether it is an adult or a children's  
 23 care home so they are regulated as a care home if it is  
 24 under 295 days.  
 25 MS BICARREGUI: The next one down, we see, if it is

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1 MS POOLE: RISCA was a sister act to the Social Services and  
 2 Well-being Act which was an outcome-focused Act. So it  
 3 puts into regulations how providers will take forward  
 4 the principles of the Social Services and Well-being  
 5 Act, so the focus on outcomes is a national outcomes  
 6 framework for Wales. The regulations are then  
 7 accompanied by statutory guidance which explains to  
 8 providers what they need to do in order to meet the  
 9 regulations and they were deliberately -- that statutory  
 10 guidance was deliberately set that if a provider was  
 11 achieving everything that was in the statutory guidance,  
 12 they would be good. So it is moving away from that sort  
 13 of minimum to actually being good and setting that  
 14 bar -- the expectation is that you're good, working  
 15 towards excellence.  
 16 MS BICARREGUI: Your statement is clear that the regulations  
 17 under RISCA you think are more effective for inspection  
 18 purposes than the National Minimum Standards.  
 19 MS POOLE: We are. It is early days. It is only 12 months  
 20 in to having re-registered all services from Care  
 21 Standards Act to Regulation and Inspection of Social  
 22 Care Act. That hasn't been formally evaluated yet, but  
 23 the view of our inspectors and the view in discussions  
 24 with providers are that they are more effective than the  
 25 Care Standards Act and National Minimum Standards which

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1 were not enforceable.  
 2 MS BICARREGUI: If we -- just to finish up, the boarding  
 3 schools we see here. Again, you inspect them, you don't  
 4 regulate them. There is a separate set of National  
 5 Minimum Standards for boarding schools, isn't there?  
 6 MS POOLE: There are, yes.  
 7 MS BICARREGUI: Just so that I am clear, you have made clear  
 8 that you think that the residential special schools  
 9 where the children are there for under 295 days should  
 10 be inspected in a different way, against different  
 11 standards. Do you think the National Minimum Standards  
 12 are adequate for inspecting boarding schools or do you  
 13 think they should also change?  
 14 MS POOLE: I think 2003 was a long time ago and our  
 15 expectations about the rights of children and  
 16 safeguarding have moved on and changed. I think they  
 17 are out of date and they do need to be reviewed and  
 18 improved. There are too many of them as well. You get  
 19 lost in the detail.  
 20 MS BICARREGUI: Thank you. That can come down, Danny.  
 21 Mrs Roberts, perhaps we could have a look at the  
 22 detail of the two different regimes in terms of  
 23 safeguarding. Danny, could we have a look at  
 24 CIW000003\_001. I think this is -- Ms Poole, this is  
 25 what you were talking about, they're regulated as care

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1 safeguarding policies and procedures are operated  
 2 effectively."  
 3 Again, that's been a feature a little bit, as I was  
 4 talking about with Ms Scott about the inquiry, that  
 5 sometimes institutions will have policies but they are  
 6 not actually embedded and working well or even  
 7 understood.  
 8 Mrs Roberts, does RISCA give you tools, if you like,  
 9 to understand that policies are being properly  
 10 implemented? Or how do you inspect or regulate this  
 11 particular feature when you go to a school?  
 12 MS ROBERTS: There are different layers under safeguarding.  
 13 So the inspector would look at all the different layers.  
 14 So a starting point would be around recruitment and  
 15 selection of staff to see how robust they are, to ensure  
 16 that they had undertaken the necessary checks to make  
 17 sure staff are suitable for their role. So that could  
 18 be DBS checks, it could be the qualifications, their  
 19 experience. And then, from that, we would then look at  
 20 the training that staff have had, and specifically to  
 21 the role. Because RISCA is very much about specifically  
 22 to the role, and making sure staff have the skills and  
 23 expertise to undertake the role, depending on what the  
 24 type of service that they're providing, whether it be  
 25 for children with a disability, children with complex

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1 home services. So we don't see children's home, we see  
 2 that they're regulated under this statutory guidance.  
 3 Is that right?  
 4 MS POOLE: That's correct, yes.  
 5 MS BICARREGUI: Then, Danny, if we could go to \_046 of this  
 6 document. If we could stay there for a moment.  
 7 Mrs Roberts, if you were going into a residential  
 8 special school where the children were there for more  
 9 than 295 days, my understanding is that, looking at  
 10 safeguarding, this would be the framework that you would  
 11 be using. Is that right?  
 12 MS ROBERTS: Correct. Yes, it is. Obviously there is  
 13 another set of regulations that define what needs to be  
 14 in place in terms of policy in respect of safeguarding  
 15 and what we'd expect to see in place in terms of  
 16 the policy and the implementation of that policy.  
 17 MS BICARREGUI: So it is this -- I think it goes over three  
 18 pages, doesn't it? As you talk about the policies, yes.  
 19 We can see here that this has got the overarching  
 20 requirement, "Must provide the service in a way which  
 21 ensures that individuals are safe and protected from  
 22 abuse", but then I think, yes, could we go over to \_047.  
 23 This is where the policies and procedures are. It says  
 24 here:  
 25 "The service provider must ensure that their

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1 needs, and then the lines of the enquiries that staff  
 2 would -- the inspectors would have would then be  
 3 ensuring that staff have all the skills and expertise  
 4 not only to meet the needs of the children, but also  
 5 have the understanding of what needs to be in place to  
 6 safeguard children. So that's around their  
 7 understanding of safeguarding processes, what they're  
 8 required to do to keep children safe in terms of  
 9 the operations of the home, so child sexual  
 10 exploitation, their understanding of that, their  
 11 understanding of the complexities of when children go  
 12 missing from care, and all those nuances that form that  
 13 sphere, if you like, of safeguarding.  
 14 So we'd expect an inspection under RISCA to ensure  
 15 that all those elements are in place to safeguard  
 16 children and, fundamentally, that the service provider  
 17 has ensured those things are in place, and then, coupled  
 18 with that, that the governance arrangements make sure  
 19 that all aspects of the service safeguard and protect  
 20 children for the quality assurance systems, et cetera,  
 21 et cetera.  
 22 MS BICARREGUI: Thank you. So that's under RISCA, so that's  
 23 a residential special school where children are there  
 24 for more than 295 days. Danny, could we see  
 25 CIW000004\_001. Mrs Roberts, these are the National

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<p>1 Minimum Standards for residential special schools.                  2 Danny, if we could go to _019 and _020. Mrs Roberts,                  3 these are the child protection, which is what it's                  4 called in the National Minimum Standards. So there is                  5 an outcome, the welfare of children is promoted and                  6 children are protected from abuse and an appropriate                  7 response is made to any allegation or suspicion of                  8 abuse. So the outcome in itself is sensible, I think.                  9 What's different if you are inspecting against these?                  10 What are you not able to do under a National Minimum                  11 Standard that you are able to do under RISCA?                  12 MS ROBERTS: Well, the primary legislation for the NMS is                  13 the Children Act and, as you're aware, the paramouncy                  14 of welfare is the significant thing in respect of                  15 children and hence where this particular NMS comes from.                  16 The challenge for us is that, whilst we can make                  17 sure that they have policies and procedures and                  18 practices in place through our inspection regime, if                  19 there are shortfalls, we cannot enforce against those,                  20 and that is a different -- that's a challenge for us, as                  21 an inspectorate, when we have got services that we only                  22 inspect as opposed to regulate. Therefore, when we find                  23 that principals, head, governors, fail to comply with                  24 the systems and processes that they should have in place                  25 to safeguard and protect children, it's at that point we</p> <p style="text-align: center;">Page 65</p>	<p>1 find that the framework under the NMS doesn't give us                  2 the powers that we need to have as an inspectorate.                  3 MS BICARREGUI: What would happen in that case would be that                  4 you would tell the Welsh Government that there was                  5 a failure to meet the National Minimum Standards, but                  6 you, as the Care Inspectorate Wales, wouldn't be able to                  7 take any action; is that right?                  8 MS ROBERTS: Correct.                  9 MS BICARREGUI: When you do tell the Welsh Government that                  10 residential special schools aren't meeting the National                  11 Minimum Standards, what happens, in your experience? Is                  12 there adequate attempts to make sure that that school                  13 improves?                  14 MS ROBERTS: I think there's only ever been one case where                  15 that has been significant. I think, in general, we have                  16 not found any significant shortfalls that have failed to                  17 safeguard and protect children in the way in which we                  18 would expect them to.                  19 In the case that we will be discussing later on this                  20 afternoon, there were clearly shortfalls that not only                  21 ourselves, as an inspectorate, but also Estyn, in terms                  22 of us taking any action forward, but also being able to                  23 hold the providers of the service to account. Because                  24 the service -- the responsibility for the service lies                  25 with the providers, and if they fail to ensure that</p> <p style="text-align: center;">Page 66</p>
<p>1 their safeguarding measures safeguard and protect                  2 children effectively, as they are required to do, this                  3 then, in terms of the powers that we have as an                  4 inspectorate, does leave us in a very vulnerable                  5 position.                  6 MS BICARREGUI: Thank you very much. Ms Poole, I think                  7 you're concerned not only that the National Minimum                  8 Standards are out of date, but you have said -- you have                  9 just told us that there were too many of them and so the                  10 most important aspects don't get the focus required; is                  11 that right?                  12 MS POOLE: I think you can get lost in the detail. Just to                  13 build on what Ms Roberts was saying then as well, we do                  14 publish an inspection report. So if we find shortfalls,                  15 we do publish an inspection report that sets out in the                  16 public domain where we see the shortfalls. And often                  17 that is a lever for improvement as well, the fact that                  18 that is being put into the public domain where people                  19 can read that and make an informed choice about whether                  20 they want to use the services of a school or not. So                  21 I think that is important. It's not -- it's obviously                  22 not the full range of enforcement powers, but it is                  23 a starting point.                  24 MS BICARREGUI: There are some other aspects that you touch                  25 on. You talk about the need for mandatory training in</p> <p style="text-align: center;">Page 67</p>	<p>1 safeguarding to include governors, for example. Is that                  2 something which is important from the Care Inspectorate                  3 Wales perspective?                  4 MS POOLE: I think it is. National Minimum Standards are                  5 not enforceable, are they, they are not regulations,                  6 they are not statutory. So to have a statutory                  7 responsibility to have a level of safeguarding training                  8 that is specific to role, so not kind of generic                  9 awareness raising, is important to us.                  10 MS BICARREGUI: Mr Rowlands, I think you, in your statement,                  11 as well, consider that there should be some sort of                  12 mandatory training for governors; is that right?                  13 MR ROWLANDS: Yes. I think it is one of the most obvious                  14 things, really, we feel. I would go further, really.                  15 The wider the requirements for training, the better for                  16 teachers, and, you know, most teachers in the education                  17 system have what's called qualified teacher status, but                  18 you don't have to have that in the independent sector.                  19 Although the vast majority do have it, and I don't think                  20 they would object, as a sector, for that to be                  21 a requirement as well.                  22 What that means is, you know, all the teachers would                  23 have an element of safeguarding built into their                  24 training anyway. So I think there are several things                  25 that can be done to tighten up the system, and these</p> <p style="text-align: center;">Page 68</p>

1 things could be introduced gradually.

2 MS BICARREGUI: I think the position at the moment is that,

3 in Keeping Learners Safe, there's a requirement for

4 governors to have some training, but there's no mention

5 of what type of training, the standard of training, or

6 the fact that it's compulsory. Is that what you're

7 focused on, Mr Rowlands?

8 MR ROWLANDS: Yes, indeed.

9 MS BICARREGUI: I think another thing that both

10 inspectorates talk about is the failure to get

11 information from various sources, which is, I think,

12 a problem for both of you. Mr Rowlands, I think you

13 tell us in your statement that, as far as you're aware

14 at Estyn, nobody is required, if you like, there is no

15 duty, no mandatory requirement, to tell Estyn anything.

16 MR ROWLANDS: Yes.

17 MS BICARREGUI: Can you tell us what would be most useful to

18 you, as an inspectorate, in terms of getting information

19 from other sources?

20 MR ROWLANDS: I think local authorities have most of

21 the information that we would find useful. You know, we

22 do get information, but it's very ad hoc and patchy,

23 depending on sort of personal relationships that have

24 been built up with particular local authorities, and

25 some authorities wouldn't do that as a matter of

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1 principle. I think there's a misunderstanding about

2 what can be shared as well. So I think any

3 recommendation coming out of this inquiry about

4 information sharing would be really helpful as well.

5 Information sharing right across the system is

6 something that needs to be looked at. It's clearly the

7 case with local authorities. We are in discussion with

8 EWC as well about teachers who might be undergoing their

9 investigative processes. So any of that kind of

10 information. And the case we will be discussing this

11 afternoon is a very good example of that. If we'd have

12 known of an earlier incident with the person concerned,

13 it would make a lot of difference to the way we would

14 have approached the inspection.

15 MS BICARREGUI: I think in Wales the LADO position is

16 slightly different to in England. But there is

17 a designated person in a local authority, isn't there,

18 who is the person who receives allegations, if you like,

19 from schools. So would it be primarily from that person

20 that you think Estyn would receive information?

21 Ms Scott, I can see that you might have a view on this.

22 MS SCOTT: I think that's one avenue, yes, the designated

23 lead officer for Safeguarding in Education. We meet

24 regularly with them as a group. There's a Safeguarding

25 in Education group nationally which is a helpful forum

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1 for generally raising awareness, promoting understanding

2 and sharing general concerns. I think, you know, we

3 have tried various ways over the years to think, how can

4 we best, pre inspection, get the information we need and

5 I think that role would be helpful in that case. But

6 I think having information at the point that it's

7 relevant is helpful to help us form our opinion of

8 the risk of different providers as well.

9 So what we'd be keen to see would be that we'd be

10 included on the list of organisations that should be

11 considered to be invited to any professional strategy

12 meeting that happens in relation to staff in independent

13 schools. Because we see for independent schools that --

14 maintained schools, there's a safeguard system around

15 them in terms of the local authority. But for

16 independent schools, I think it's important that, as the

17 inspectorate, and probably Welsh Government, as well, as

18 a regulator, then we should be part of that discussion

19 so that the powers and the work that we can do and the

20 evidence that we hold can be brought to bear in those

21 discussions. So we have opened discussions with

22 colleagues here about that, so we are hopeful that that

23 might be a way forward as well. So we'd get that at the

24 point that it happens so we can use that in our

25 inspection planning as well.

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1 MS BICARREGUI: Ms Poole, I think you tell us that you

2 receive concerns from a number of sources, so sometimes

3 from staff working at a school. But you say there is no

4 duty on a local authority to pass concerns about

5 a service to you. They often do do it, as part of

6 section 47, but there's no duty.

7 Would it be helpful if there was a duty for concerns

8 to be passed to the Care Inspectorate Wales?

9 MS POOLE: There would. I mean, for regulated services, the

10 residential special schools that are registered with us,

11 there is a requirement for them to notify us of

12 safeguarding issues. Because we inspect local authority

13 adult and children's services, we have a list of things

14 that we ask the local authority to tell us about

15 routinely, whether that's the death of a child, or --

16 and it includes on that list safeguarding concerns that

17 they should share those with us. We have recently

18 written again to all heads of children's services to

19 remind them to tell us about any safeguarding issues in

20 regulated services and/or boarding schools and

21 independent schools in their local authority area.

22 Because we have had recently, to do with a children's

23 home where we weren't told. So we have reminded them of

24 that expectation recently.

25 MS BICARREGUI: Again, yes, you have greater powers where

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<p>1 you regulate, but I think for residential special 2 schools under 295 days, all the NMS says is they have to 3 refer to the local authority and they're meant to notify 4 you of any outcome of child protection enquiries. Is 5 the problem with that, again, that it's not enforceable 6 or that it doesn't happen? 7 MS POOLE: Both. It is fair to say that the majority of 8 residential special schools in Wales are operated by 9 local authorities, so that tends to happen more because 10 of the relationship we have with the local authority. 11 But it's not a statutory relationship, it's just a good 12 working relationship, and that sometimes relies on 13 individual relationships, which isn't robust enough. 14 MS BICARREGUI: I think at the moment, again, the National 15 Minimum Standards for residential special schools, the 16 provider has to ensure that staff and children are given 17 information about how to contact you, but that's not the 18 case for the National Minimum Standards for boarding 19 schools, I don't think, is it? 20 MS POOLE: No. No, it is not. 21 MS BICARREGUI: You have made clear that you think the 22 National Minimum Standards need a complete overhaul 23 anyway, but that would be something at boarding schools 24 that in particular need to be looked at, I suppose. 25 MS POOLE: Yes.</p> <p style="text-align: center;">Page 73</p>	<p>1 MS BICARREGUI: Just to briefly look at -- Mr Rowlands, you 2 talk about the impact that sort of real-time reduction 3 in funding has had on Estyn. You tell us that it's 4 meant smaller inspection teams and a more focused 5 inspection framework. I think it's also meant, hasn't 6 it, that inspections happen less frequently; is that 7 right? 8 MR ROWLANDS: Yes. I could talk about this for a long time. 9 We have had real cuts over the last sort of ten years, 10 and it's had two effects, as you say. The inspection 11 teams have become smaller. In particular, we don't 12 inspect curriculum subjects anymore. So that, in 13 itself, has an impact on the information that we have, 14 on the school. But it also means that the time we spend 15 in a school is less, and if you are talking about 16 safeguarding, the more engagement we have with learners 17 and with staff, the better the overall picture you get 18 of the culture of the school. So although it's not 19 a direct impact, we still look at the management and the 20 overall safeguarding in a very similar way as we did 21 previously. But the actual evidence that you're 22 gathering is slimmed down. So that's one impact of 23 the cuts. 24 The other impact, as you say, is that we inspect 25 less frequently. So the inspection cycle, originally</p> <p style="text-align: center;">Page 74</p>
<p>1 it's six years, and it's been extended currently to ten 2 years and then to eight years, in order to release 3 resource for the inspectorate to support the new 4 curriculum in Wales that's due to start in 2022. 5 We did that in two stages, as I say, to six years 6 and eight years. It is supposed to return to a six-year 7 cycle in 2024. 8 Also, as you will have seen from some of 9 the submissions you've had, there is discussion about 10 a change programme that Estyn has gone through called 11 Learning Inspectorate that suggests we should have more 12 frequent inspections in future. 13 So all of this has had that impact of having fewer 14 and less frequent engagement with schools, and that's 15 also the case for independent schools, as well as for 16 maintained schools. 17 MS BICARREGUI: As you say, the time between inspections 18 being greater, and if you combine that with what you 19 have described as not getting very much information from 20 schools, because if you are getting information, 21 I guess, and you know that there's a problem, you might 22 be told to inspect by the Welsh Government. Is there 23 a safeguarding issue here with the longer inspection 24 cycles coupled with the lack of information? 25 MR ROWLANDS: I think there is. I should emphasise that</p> <p style="text-align: center;">Page 75</p>	<p>1 roughly half of the independent schools are independent 2 special schools and, as we mentioned earlier, we have 3 annual monitoring of those. So, as part of 4 the minister's remit letter to us, annual remit letter, 5 that identifies that they would like us to do these 6 annual monitorings. 7 So I think we've got a pretty good feel for the 8 culture in the independent special sector because we are 9 visiting them very often. But it's the mainstream 10 independent schools, as you say, we are only visiting 11 those every six or seven years, unless we are asked to 12 do a specific focused visit. 13 One suggestion, if there was more resource 14 available, is that we could visit those schools more 15 frequently, and there's lots of ways in which we could 16 do that. I mean, you know, we could have bigger teams 17 or we could visit them more frequently or we could have 18 a more targeted approach, which I think is what we would 19 suggest would be the best use of money. 20 So, for example, we could say that an independent 21 mainstream school that's got boarding facilities -- 22 there are only about five of them in Wales -- could be 23 treated more like the independent special schools, and 24 we visit them more and monitor them maybe in between 25 inspections, core inspections, more frequently.</p> <p style="text-align: center;">Page 76</p>

1 MS BICARREGUI: Ms Poole, I think -- it depends on what type  
2 of setting in terms of how often you would inspect. My  
3 understanding is that residential special schools,  
4 whether or not they are also registered care homes, you  
5 go to see those annually. Is that right?  
6 MS POOLE: It is. Yes, we do.  
7 MS BICARREGUI: And boarding schools and FE colleges,  
8 I think that's every three years.  
9 MS POOLE: It is, yes.  
10 MS BICARREGUI: In your statement, I think I'm right in  
11 saying that you don't think that simply increasing the  
12 frequency of inspections would necessarily keep children  
13 safe. You talk about changing the law and regulatory  
14 framework around governance and monitoring and quality  
15 assuring services. It is not just a frequency issue,  
16 I think; is that right?  
17 MS POOLE: It isn't just a frequency issue, because we could  
18 inspect every year, but we are still hidebound by not  
19 having any enforcement powers and National Minimum  
20 Standards only being minimum standards and not  
21 requirements. So that wouldn't change that.  
22 What we haven't found is significant issues in the  
23 sector -- in this sector when we have done inspections,  
24 and we will bring inspections forward or do a focused  
25 inspection when we receive concerns, so some schools do

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1 have more frequent inspections. The reason that we have  
2 brought those residential special schools that are under  
3 295 days in line with those that are over 295 days is  
4 precisely for the reason that it's a kind of arbitrary  
5 number but the needs of the children in terms of their  
6 care and support needs are the same, regardless of  
7 whether they are there for 296 or 294 days.  
8 MS BICARREGUI: That's very much some of the evidence we  
9 have also heard in England. I'd like to talk, before we  
10 break, about the culture of a school. How can you  
11 really -- this is kind of the Holy Grail, really, of  
12 inspecting and I'm not sure we are going to get to it  
13 before the lunch break, but how do you try and get under  
14 the skin of the culture of a school? Ms Poole, you say  
15 there is no system, obviously, I suppose, for analysing  
16 the culture, that you are informed by what you see and  
17 you hear and you're reliant on the professional  
18 experience of your inspectors. That's what you tell us.  
19 Can you give us a taste of what professional experience  
20 your inspectors have to do that job?  
21 MS POOLE: We employ them as inspectors but they have all  
22 got professional backgrounds, whether that's  
23 as a teacher, a nurse or a social worker. In terms of  
24 the inspectors that are currently in the adults' -- the  
25 children's and younger adults' team, they have all got

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1 experience of working in children's services within  
2 a local authority. So they come with a children's  
3 social work background. But experience of inspecting  
4 other sectors as well. You take that in. So we talk to  
5 children. So the voice of children is paramount in  
6 terms of what they're telling us, but also talking to  
7 teachers, are they well supported, do they understand  
8 what safeguarding means, talking to guardians.  
9 So the starting point is not to look at records, the  
10 starting point is to hear about people's experiences and  
11 whether they're good or poor. We then look for what are  
12 the root causes of that. So what is promoting  
13 a positive culture or what is promoting a negative  
14 culture and why is that, and knowing how to do that  
15 comes with professional judgment. The more people  
16 inspect, the more they can walk into a service, and  
17 inspectors will say, "We walk into a service and know  
18 immediately, often, whether something is right or wrong"  
19 and they follow that, they follow that trail, they will  
20 track individual children, look at their care and  
21 support plans and track that through to look at what's  
22 promoting positive outcomes or not positive outcomes for  
23 a child.  
24 MS BICARREGUI: Mrs Roberts, it is your team, I think, is  
25 the children and younger adults regulated social care

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1 services; is that right? You describe in your statement  
2 some of the safeguarding training they have, but I think  
3 you also raise a problem, which we have seen elsewhere,  
4 which is that if provider and staff sort of collude to  
5 hide issues in relation to safeguarding, it's very hard  
6 to identify them. I suppose that's true across the  
7 board in both RISCAs-regulated services and non-RISCAs; is  
8 that right? Mrs Roberts, you're on mute, I think.  
9 MS ROBERTS: Apologies. The expectation is that people  
10 are -- providers are open and transparent, but,  
11 unfortunately, we find that is not always the case. As  
12 Ms Poole has just said, our inspectors are very  
13 knowledgeable and skilled at looking at the lines of  
14 enquiries to uncover some of what would be systematic  
15 failures in terms of an operation of a home which would  
16 then affect the culture of that home, which would then  
17 have a negative impact on the overall well-being of  
18 the children within the service.  
19 But culture is something that's very difficult to  
20 unpick and challenge, as this inquiry has identified.  
21 Our inspectors would start, really, with the basics,  
22 in terms of looking at what those values and principles  
23 are that are in place in a service; how those are  
24 implemented, in terms of policies and practice; checking  
25 those out; discussing with the staff their understanding

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<p>1 of what's in place; speaking with children and young                  2 people to see what their experiences are of the care                  3 that they're receiving; and then looking then, through                  4 our inspection lens, through, you know, what is the                  5 regulations or the NMS, to see what then are the                  6 positives or the negatives, in terms of that provision                  7 of the service.                  8 But, as Ms Poole has identified, it's very                  9 challenging for us, as inspectorates, to uncover at                  10 times what is that culture.                  11 MS BICARREGUI: Sorry to interrupt, Ms Roberts, how long are                  12 your inspectors spending in the schools? We heard from                  13 Ms Scott how long Estyn were there. How long are you                  14 typically on site?                  15 MS ROBERTS: It varies -- it's the same as Estyn --                  16 depending on the size of the service. But the average                  17 would be two inspectors two to three days. If it is                  18 a focused inspection, whereby we have particular                  19 concerns and we are looking at those concerns and it's                  20 just a focused inspection, that might be either shorter                  21 or longer, depending on what information we gather                  22 during the course of the inspection.                  23 You know, whilst we have a framework under which we                  24 specify the timeline and the methodology of                  25 the inspection, that is flexible, because we have to</p> <p style="text-align: center;">Page 81</p>	<p>1 make sure that during the course of the inspection that                  2 we look at the key lines of enquiry that we have                  3 identified that we need to follow.                  4 MS BICARREGUI: I just noticed that -- we were talking about                  5 concealment and how difficult that is. I think,                  6 Ms Poole, you tell us in your statement that a duty of                  7 candour, which is something the inquiry has been looking                  8 into, applies to all RISCA-registered services already.                  9 Is that right?                  10 MS POOLE: That's right. In the statutory guidance that you                  11 put up earlier, the leadership and management, there's                  12 a specific thing about how we will inspect culture, and                  13 that's very much around the duty of candour and the                  14 openness and transparency and responsibility of the RI                  15 and the provider to promote that culture.                  16 MS BICARREGUI: I think your view is that that duty should                  17 apply in all school settings?                  18 MS POOLE: Yes. I can't see a reason why it shouldn't.                  19 MS BICARREGUI: I think, Mr Rowlands, as well, in your                  20 statement you talk about the inclusion of a duty of                  21 candour being a helpful thing from Estyn's perspective?                  22 MR ROWLANDS: Yes, indeed. I suppose you could have                  23 a discussion about how that's implemented, but I think,                  24 if you had registration of teachers in independent                  25 schools by the EWC, they have a Code of Practice that</p> <p style="text-align: center;">Page 82</p>
<p>1 includes that sort of thing automatically in it. So                  2 that would be one way of doing it.                  3 MS BICARREGUI: Just the last thing I'd like to touch on,                  4 and then I will ask you if you have got anything else                  5 you want to add, is, in your statement you tell us about                  6 difficulties with unannounced inspections, particularly                  7 in the Care Inspectorate Wales. I think, Ms Poole, your                  8 inspections of residential special schools are                  9 unannounced; is that right?                  10 MS POOLE: They are, yes. We treat them as care homes,                  11 unannounced.                  12 MS BICARREGUI: But boarding schools are announced, I think,                  13 four weeks in advance; is that right?                  14 MS POOLE: They are. We did pilot doing them as unannounced                  15 but it didn't work because, when we turned up, there                  16 weren't children that we could talk to; the records and                  17 things weren't available; and it wasn't an effective or                  18 efficient use of our time, so we moved back to them                  19 being announced.                  20 MS BICARREGUI: I suppose the question that strikes me is,                  21 why do they work for residential special schools?                  22 Because presumably -- but they don't work for boarding                  23 schools?                  24 MS POOLE: Can I pass that question on to Mrs Roberts?                  25 She's more familiar and can give you a better answer.</p> <p style="text-align: center;">Page 83</p>	<p>1 MS ROBERTS: What we are talking about in residential                  2 special schools is where we are talking about a smaller                  3 service. So we are talking about fewer children, fewer                  4 staff and less complexities in terms of the arrangements                  5 around the provision of the boarding facilities. In                  6 boarding schools, we are talking about, often, larger                  7 boarding facilities that may be different sites. So it                  8 requires more in-depth planning, more in-depth                  9 consultation with the various staff who are working in                  10 the school, and what we found during the pilot of                  11 the unannounced inspections, that the key people weren't                  12 available because they had critical things already in                  13 their diary that they couldn't free themselves up.                  14 But, I have to say, if we do have concerns, whether                  15 that's a concern that's raised with us from a parent,                  16 a child or intelligence that we get from Welsh                  17 Government or through Estyn, that we would always                  18 undertake an unannounced inspection, and we have done                  19 that either as an individual inspectorate or jointly                  20 with Estyn.                  21 MS BICARREGUI: Mrs Roberts, I suppose just -- four weeks is                  22 a long time, isn't it, for boarding schools to be able                  23 to get their house in order. That's the only point to                  24 make really there?                  25 Ms Scott, you only do unannounced inspections as</p> <p style="text-align: center;">Page 84</p>

1 a matter of urgency, I think. How much time do  
 2 schools -- how much notice do schools typically have for  
 3 an Estyn inspection?  
 4 MS SCOTT: Routinely for care inspections it's three weeks.  
 5 For annual monitoring visits and follow-up inspections  
 6 it's two weeks, which has come down quite a bit over the  
 7 last ten years or so. We have edged it and edged it.  
 8 I think if we could go a little bit shorter again, we  
 9 would do that. There are some practical considerations  
 10 which suffers from doing unannounced and, similarly,  
 11 some experiences of just not making the best use of  
 12 the time we have got there as a result of it. So we'd  
 13 usually only use unannounced where the intelligence we  
 14 had and the concern we were going to look at merited it  
 15 being unannounced and we felt we'd gain something by it  
 16 being unannounced.  
 17 So, for example, if the intelligence that had been  
 18 shared with us was that there were inappropriate  
 19 staffing levels or behaviour was out of control or  
 20 something was happening in this way that we felt that  
 21 turning up unannounced might actually help us to see  
 22 that as it was happening, that would be what would drive  
 23 that decision, really.  
 24 MS BICARREGUI: Again, information sharing critical?  
 25 MS SCOTT: Yes.

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1 MS BICARREGUI: Chair, looking at the time, I think now is  
 2 probably about the right time to break for lunch.  
 3 THE CHAIR: Yes. We will return at 1.45 pm. Thank you.  
 4 (12.48 pm)  
 5 (The short adjournment)  
 6 (1.45 pm)  
 7 THE CHAIR: Good afternoon, everyone, and welcome to this  
 8 final session of Day 9. Ms Scolding?  
 9 MS SCOLDING: Good afternoon, chair. Good afternoon, panel.  
 10 This afternoon, we will hear evidence from  
 11 Professor Holland, Dr Jones and hear again from  
 12 Mr Rowlands and Ms Poole.  
 13 PROFESSOR SALLY HOLLAND (sworn)  
 14 DR CHRIS JONES (affirmed)  
 15 MR MEILYR ROWLANDS (continued)  
 16 MS VICKY POOLE (continued)  
 17 Examination by MS SCOLDING  
 18 MS SCOLDING: As there are four of you this afternoon,  
 19 I wanted just to indicate that, if you wish to answer  
 20 a question to which I have specified one particular  
 21 person and you want to contribute, please would you mind  
 22 raising your hand.  
 23 As there are four of you, I shall try and ask  
 24 directly whichever one of you I want to start the  
 25 question with -- to answer any questions, but, again,

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1 MS BICARREGUI: Thank you all very much. I don't have any  
 2 further questions for you, but the chair and panel may  
 3 have some questions, if you can stay there.  
 4 THE CHAIR: Thank you, Ms Bicarregui. Ms Sharpling, do you  
 5 have any questions?  
 6 MS SHARPLING: No, thank you, chair.  
 7 THE CHAIR: Mr Frank?  
 8 MR FRANK: No, thank you.  
 9 THE CHAIR: Sir Malcolm?  
 10 PROF SIR MALCOLM EVANS: Just one brief question, if I may.  
 11 Questions from THE PANEL  
 12 PROF SIR MALCOLM EVANS: At various points, many mentioned  
 13 the need for better information sharing, particularly  
 14 with local authorities. What precisely do you think  
 15 would be helpful in this regard?  
 16 MS POOLE: From CIW's perspective, I think it would be that  
 17 they had a requirement to inform us about safeguarding  
 18 allegations in relation to independent schools.  
 19 PROF SIR MALCOLM EVANS: Thank you.  
 20 MR ROWLANDS: And the same for Estyn as well.  
 21 PROF SIR MALCOLM EVANS: Thank you.  
 22 THE CHAIR: Thank you very much. I have no questions.  
 23 Thank you very much to all of the witnesses.  
 24 MS BICARREGUI: Thank you.  
 25 (The witnesses withdrew)

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1 that doesn't preclude any of you coming in at a later  
 2 point.  
 3 Just a few other housekeeping matters. This isn't  
 4 a test of memory. Please feel free to refer to your  
 5 notes. We will be breaking at around 2.45 pm, but we  
 6 can have a break earlier, if any of you need it.  
 7 You should all have bundles in front of you which  
 8 should have relevant witness statements and exhibits.  
 9 But I will speak to somebody called Danny and get  
 10 various bits of documents up on screen. Again, if you  
 11 can't see them or you need them to be enlarged or  
 12 changed in any way, please do let me know.  
 13 I'm hoping there will be no technical glitches, but  
 14 if there are, stay where you are and we will try to get  
 15 you back on screen as quickly as possible.  
 16 The last point I would make is, please try not to  
 17 name anyone whom the inquiry has given a cipher to. If  
 18 that were to happen, we would have to, or potentially  
 19 have to, break, and inevitably, because the hearing is  
 20 live, that information would be out there. So please,  
 21 as we are talking about a specific case, please don't  
 22 talk about any of the young people involved by name.  
 23 Thank you.  
 24 Dr Jones, turning to you, we have a witness  
 25 statement from you behind tab 15 of the bundle.

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<p>1 DR JONES: Yes.</p> <p>2 MS SCOLDING: It is dated 10 November 2020. Can you confirm</p> <p>3 that you signed this?</p> <p>4 DR JONES: I did.</p> <p>5 MS SCOLDING: Is it true, to the best of your knowledge and</p> <p>6 belief?</p> <p>7 DR JONES: It is.</p> <p>8 MS SCOLDING: Can you just tell us briefly who you are</p> <p>9 within the context of the Welsh Government?</p> <p>10 DR JONES: I am deputy director of support for learners</p> <p>11 division. Responsibility includes sort of a few areas,</p> <p>12 so additional learning needs and the reform of</p> <p>13 the system; supporting achievement of Safeguarding in</p> <p>14 Education; pupil well-being, and that includes sort of</p> <p>15 independent schools and youth engagement.</p> <p>16 MS SCOLDING: Your witness statement largely relies on the</p> <p>17 two witness statements of Mr Heaney, who we heard from</p> <p>18 this morning about some aspects of the education</p> <p>19 safeguarding system in Wales. Thank you.</p> <p>20 Professor Holland, can I ask you to turn to tabs A9</p> <p>21 and 10 of your bundle because you have provided us with</p> <p>22 two witness statements, the first of which is -- well,</p> <p>23 in fact, they are both dated 7 April 2020. Can I ask</p> <p>24 you to turn to the first one, behind tab 9 first, and</p> <p>25 can you confirm that you signed that witness statement?</p> <p style="text-align: center;">Page 89</p>	<p>1 Professor Holland, I think you might be on mute.</p> <p>2 PROF HOLLAND: Apologies. Yes, I can confirm that.</p> <p>3 MS SCOLDING: Is it true, to the best of your knowledge and</p> <p>4 belief?</p> <p>5 PROF HOLLAND: It is.</p> <p>6 MS SCOLDING: We have a second witness statement from you,</p> <p>7 dated the same date. Again, on the last page, 22, can</p> <p>8 you confirm that you signed that document?</p> <p>9 PROF HOLLAND: Yes, I can confirm that.</p> <p>10 MS SCOLDING: Is it true, to the best of your knowledge and</p> <p>11 belief?</p> <p>12 PROF HOLLAND: It is.</p> <p>13 MS SCOLDING: Can I just ask you to explain, you are</p> <p>14 Professor Sally Holland and you are the Children's</p> <p>15 Commissioner for Wales. Perhaps, for the lay people</p> <p>16 following along who don't understand what the Children's</p> <p>17 Commissioner is and what they do, can you just explain</p> <p>18 to us a little bit about who you are and what you do?</p> <p>19 PROF HOLLAND: So I am the independent champion for children</p> <p>20 and young people in Wales, from birth up to the age of</p> <p>21 18. It is my -- I am set up as a statutory agency, but</p> <p>22 independent of government. It is my role to safeguard</p> <p>23 and promote the welfare and rights of children.</p> <p>24 MS SCOLDING: Thank you very much, Professor Holland. We</p> <p>25 also have on screen Ms Poole and Mr Rowlands. Ms Poole,</p> <p style="text-align: center;">Page 90</p>
<p>1 we have two witness statements from you in the bundle,</p> <p>2 at tabs A6 and A7. We will be looking at parts of those</p> <p>3 witness statements, so I may well take you to them</p> <p>4 later. Those witness statements were already adduced in</p> <p>5 evidence this morning, chair and panel.</p> <p>6 Again, Mr Rowlands of Estyn, we have two witness</p> <p>7 statements from you, at tabs 3 and 4 of the bundle,</p> <p>8 which, again, formed part of your evidence this morning.</p> <p>9 Helpfully, we have already heard from two of you</p> <p>10 this morning, as well as Mr Heaney, teasing out some of</p> <p>11 the framework for safeguarding and child protection in</p> <p>12 Wales.</p> <p>13 What we would like to do this afternoon is to deal</p> <p>14 with certain topics and issues and get your views and</p> <p>15 opinions on them through looking at a safeguarding case</p> <p>16 that you have all been involved with in the past two</p> <p>17 years and trying to learn some lessons from that, which</p> <p>18 I know has informed all of your thinking about</p> <p>19 regulation, particularly of the independent schools</p> <p>20 sector, something which I know Mr Rowlands and Ms Poole</p> <p>21 spoke about this morning.</p> <p>22 The situation, maybe just to sort of outline for</p> <p>23 those who are following along, there had been some</p> <p>24 safeguarding concerns raised in a call called Ruthin,</p> <p>25 which is an independent day and boarding school for</p> <p style="text-align: center;">Page 91</p>	<p>1 students in Denbighshire, which is in North Wales. All</p> <p>2 of you have provided witness statements which deal</p> <p>3 expressly with the concerns that you have raised about</p> <p>4 this school and how your institutions responded to those</p> <p>5 concerns. I shall ask, chair, for all those witness</p> <p>6 statements to be adduced in full.</p> <p>7 In order to understand the issues, however, we need</p> <p>8 to get a sense of the narrative around Ruthin and look</p> <p>9 at the particular issues which arose in that case.</p> <p>10 Mr Rowlands, if I could turn to you first, in your</p> <p>11 witness statement, ETN000759_004, which is behind tab 4</p> <p>12 of the bundle at paragraph 9 -- Danny, can you get up</p> <p>13 paragraph 9, please, of ETN000759_004. Could you go</p> <p>14 over to the next page as well, Danny, to _005, and could</p> <p>15 you then highlight and expand paragraphs 9 through 13.</p> <p>16 Mr Rowlands, this is the first concern that we know</p> <p>17 about Ruthin School in the reasonably recent past, would</p> <p>18 be the way I would describe it. So there had been</p> <p>19 concerns alleged with the local authority regarding the</p> <p>20 principal's relationship with a female pupil, we can see</p> <p>21 at paragraph 9, particularly the attention he was paying</p> <p>22 her.</p> <p>23 I suppose the first question I wanted to ask is,</p> <p>24 were you, as Estyn, told anything about this?</p> <p>25 MR ROWLANDS: No, we weren't.</p> <p style="text-align: center;">Page 92</p>

1 MS SCOLDING: Do you think you should have been told about  
2 this?  
3 MR ROWLANDS: Yes, I think we definitely should have.  
4 MS SCOLDING: Obviously, that was something where the local  
5 authority's children's services were involved, so maybe,  
6 again, does that show one of the points both yourself  
7 and Ms Poole were making earlier, which is the need for  
8 there to be some kind of system to ensure that referrals  
9 are made to the appropriate inspectorates, where  
10 concerns have been raised about a school?  
11 MR ROWLANDS: Yes. I think things have improved since that  
12 time and Denbighshire County Council is a good example  
13 of that, because subsequent incidents were mentioned to  
14 Estyn, but this one wasn't.  
15 MS SCOLDING: Had it been mentioned, what would you have  
16 done, what were you likely to have done?  
17 MR ROWLANDS: What we are seeing currently is that we would  
18 like to be involved in the part IV investigations, and  
19 then our sort of expertise can feed into those  
20 deliberations. I think if ourselves and possibly other  
21 people were aware of this situation, possibly the  
22 development of this case might never have happened.  
23 MS SCOLDING: Ms Poole, can I ask you, were you told about  
24 the incident in 2011 by Denbighshire, as you obviously  
25 were responsible for the boarding welfare side of

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1 inspections at that time?  
2 MS POOLE: We were. An inspector attended the part IV  
3 investigation. As Mr Rowlands has said, I think, if it  
4 happened now, we definitely would involve and speak to  
5 Estyn about it. At that time, I don't think our  
6 information sharing between CIW and Estyn was as good as  
7 it is now. But we did attend the safeguarding meeting.  
8 MS SCOLDING: What steps, if any, did you take? Did you  
9 undertake any kind of emergency inspection after this  
10 incident had been raised or was it just closed because  
11 it was potentially a malicious allegation?  
12 MS POOLE: No, we didn't take any action. We considered the  
13 part IV investigation and the feedback that was given in  
14 the part IV meeting and decided there was no further  
15 action for us to take at that time.  
16 When we did a subsequent inspection in 2013, we  
17 would have used that to inform our inspection planning,  
18 but at the time in 2011 we didn't do anything further.  
19 MS SCOLDING: Again, as I understand it, there is no  
20 obligation for a school, if it isn't also registered as  
21 a children's home, to report any incidents to you like  
22 this at the moment?  
23 MS POOLE: No, not at the moment there isn't, no.  
24 MS SCOLDING: Dr Jones, can you tell me, were you told about  
25 this incident, either by the school or by the local

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1 authority? By "you", I mean the Welsh Government, not  
2 you personally.  
3 DR JONES: Yes, sorry, I'm not 100 per cent sure. I'm just  
4 double-checking. Apologies.  
5 MS SCOLDING: That's fine.  
6 DR JONES: My system has frozen, so I'm struggling.  
7 MS SCOLDING: Dr Jones, maybe we will come back to you  
8 later. Maybe now would be an appropriate moment to  
9 bring in Professor Holland. Professor Holland, do any  
10 kind of concerns or complaints about young people living  
11 away from home, which would include boarding settings,  
12 come to you automatically, or do you run any kind of  
13 service for children who live away from home?  
14 PROF HOLLAND: So a complaint like this wouldn't come to us  
15 automatically. There are two -- the main route it would  
16 come to us would be if a child, or someone representing  
17 the child, approached our investigation and advice  
18 service and asked for support with a complaint or  
19 a concern that they had, and that might be that they  
20 were concerned that it wasn't being investigated  
21 properly or that they weren't satisfied with the result.  
22 So that would be one way we would be alerted to it.  
23 Another would be if there was a matter of real  
24 concern about a particular school or institution, in  
25 which case the body, such as an inspectorate, might

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1 alert us that there was an issue that they wanted to  
2 alert us to about this case. Sometimes, for example,  
3 Care Inspectorate Wales will alert us if they are  
4 concerned formally about an area they're regulating.  
5 MS SCOLDING: Do you have any -- I'm assuming that, as the  
6 Children's Commissioner, you do have power to enter into  
7 any institution, if you consider a child might be at  
8 harm, and see them. Do you have that power?  
9 PROF HOLLAND: I don't have the power in every circumstance.  
10 So not in certain private institutions, for example.  
11 However, in terms of one which has got accommodation for  
12 children, I do have the power to intervene. So in this  
13 case, I do have the power to intervene in a boarding  
14 school.  
15 MS SCOLDING: We know that the English Children's  
16 Commissioner runs a service called Help at Hand, which  
17 is largely for children who are looked after, but it  
18 says it's for all children who live away from home,  
19 which provides a kind of telephone line, but it is a bit  
20 more than that, because you can then do casework and  
21 bring complaints and kind of it operates as, in effect,  
22 like a complaints mechanism for those who are living in  
23 care.  
24 Do you have anything similar for children living in  
25 boarding settings in Wales?

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<p>1 PROF HOLLAND: We have a similar service which is available                  2 to all children living in Wales, whether they're --                  3 wherever they live, and it certainly is open to children                  4 in boarding schools, and the reason that I became                  5 involved in this case in the first place was because                  6 a boarder at the school approached my service, which is                  7 called our Investigation and Advice service and, similar                  8 to the Help at Hand service, we not only provide                  9 telephone advice, but we can get involved at a casework                  10 basis and did in this case.                  11 MS SCOLDING: So it shows the -- I suppose your involvement                  12 in this case shows that those kind of systems, at least,                  13 are being used in Wales, by at least one young person.                  14 PROF HOLLAND: We had over 600 enquiries last year, for                  15 example.                  16 MS SCOLDING: That's very helpful. So there was a concern                  17 in 2011, for which, for one reason or another, nothing                  18 was done and Estyn weren't alerted to it. There was                  19 then a further complaint, I understand, Mr Rowlands, in                  20 2016. Danny, ETN000759_005, paragraphs 14 through to                  21 19, please, which is _006.                  22 Mr Rowlands, this was another complaint which was                  23 made to Estyn itself --                  24 MR ROWLANDS: Yes.                  25 MS SCOLDING: -- about potential bullying, so to speak.</p> <p style="text-align: center;">Page 97</p>	<p>1 MR ROWLANDS: Yes. The main complaint was how that was                  2 handled by the school.                  3 MS SCOLDING: It wasn't the incident in and of itself; it                  4 was the handling by the school.                  5 Can I ask why you -- did you do any form of                  6 emergency inspection at that stage, given the concerns                  7 that were raised?                  8 MR ROWLANDS: No, we didn't, in that case.                  9 MS SCOLDING: Do you think you should have done? Or do you                  10 think you should have asked the DfE -- sorry, not the                  11 DfE. Do I assume that the position is that, if you want                  12 to inspect a school on an emergency basis, you would                  13 have a conversation with Dr Jones, or with one of his                  14 equivalents who are responsible for independent                  15 education, and they would then commission you to                  16 undertake an emergency inspection? Is that the way it                  17 works in Wales, Mr Rowlands?                  18 MR ROWLANDS: Yes, it is. That's exactly how it works.                  19 I think, in this case, we didn't feel that any children                  20 were under direct risk of harm, and so we didn't pursue                  21 this any further.                  22 MS SCOLDING: Dr Jones, I see from Mr Rowlands' witness                  23 statement that the Welsh Government was involved in this                  24 case, inasmuch as that correspondence was given as                  25 a result of advice that Estyn had given the family about</p> <p style="text-align: center;">Page 98</p>
<p>1 referring it to the Welsh Government and, in fact, the                  2 Welsh Government asked if we had any other intelligence                  3 on the school.                  4 What, if anything, did you know about this                  5 particular concern and complaint and did it raise any                  6 concerns with the Welsh Government at the time that it                  7 was made?                  8 DR JONES: Can I go back to 2011 and confirm --                  9 MS SCOLDING: Yes, please do.                  10 DR JONES: We were not informed by the LA or the school.                  11 MS SCOLDING: So you had no knowledge of what was going on                  12 in 2011, despite the fact that, although obviously it                  13 was -- nothing came of it, it was, potentially, quite                  14 a serious safeguarding situation.                  15 DR JONES: That's right. We would have been informed by the                  16 Estyn if they were aware, they would have contacted us.                  17 But apart from that, we had no knowledge.                  18 MS SCOLDING: You had no knowledge of that. How about in                  19 2016? Obviously you had knowledge, but that was via                  20 Estyn rather than the school referring anything to you                  21 themselves; is that right?                  22 DR JONES: That's right. So Estyn informed us. We                  23 considered the evidence they provided to us, and given                  24 that they said there was no concerns, then we wouldn't                  25 have taken any action in this instance.</p> <p style="text-align: center;">Page 99</p>	<p>1 MS SCOLDING: Dr Jones, sort of passing over to you, there                  2 was then a further referral from Denbighshire in 2018                  3 about Ruthin School because the local authority had                  4 written to you raising some concerns. In fact, this is                  5 it out in Mr Rowlands' witness statement, but, Dr Jones,                  6 I'm going to ask you about this. That's ETN000759_006,                  7 paragraphs 20 through to 23. Could you tell us a little                  8 bit, Dr Jones, about how this came to your attention?                  9 What came to your attention?                  10 DR JONES: We had a phone call from Denbighshire Children's                  11 Services about a range of concerns that they had around                  12 adults -- sorry, adults, about certain people in the                  13 school. Our normal course of action would be (a) to                  14 take legal advice on the concerns and then (b) to ask                  15 the inspectorate to do a visit to the school if there                  16 were any concerns.                  17 MS SCOLDING: As I understand it, you -- firstly, if I look                  18 at this, you wrote to the school and asked the school to                  19 provide a relevant copy of the policy on safeguarding                  20 and promoting the welfare of pupils. That's at                  21 paragraph 23. And also to confirm in writing various                  22 things about why the staff member hadn't been suspended,                  23 any arrangements to do with the investigations, what                  24 information had been sent to the workforce council.                  25 Now, of course, as we heard this morning, and as we</p> <p style="text-align: center;">Page 100</p>

<p>1 heard from Mr Llewellyn earlier in the week, teachers in 2 independent school settings don't have to register with 3 the Education Workforce Council. It is one of the sort 4 of anomalies in the system. 5 Then, as I understand it, the chair of the council 6 of management responded in April 2018 -- this is set out 7 at paragraph 24 of Mr Rowlands' witness statement, which 8 is on the next page, please, Danny -- and, as 9 I understand it, at paragraph 25, shortly after there 10 had been that response, the member of staff was put on 11 administrative duties and the Welsh Government requested 12 advice from Estyn. That was made available. 13 Can I just double-check, the position as follows is 14 that you don't undertake any investigation yourself, 15 Dr Jones, of any allegations; you would pass everything 16 to Estyn for them to inspect and then, in effect, talk 17 to you about what the problems might be in independent 18 schools? 19 DR JONES: So we would ask for information from the 20 independent schools and then pass that advice on to the 21 inspectorates for them to give us their professional 22 opinion on the position and then we make a decision on 23 the next steps. 24 MS SCOLDING: You don't have any investigative function in 25 and of itself in your role as registrar of independent</p> <p style="text-align: center;">Page 101</p>	<p>1 schools? You wouldn't go and do an investigation, in 2 this circumstance, yourself? 3 DR JONES: We would pass the information on to our 4 Social Services colleagues within Welsh Government and 5 they would give us their views on some of 6 the safeguarding aspects from a Social Services 7 perspective. 8 MS SCOLDING: We have a copy of that report, which is behind 9 tab B26. Danny, it is ETN000761. 10 Mr Rowlands, maybe you could tell us a little bit 11 about this. Could we go to _002 over to _003. I think 12 that's probably the most important. It says "Main 13 findings". Mr Rowlands, at the top of this page it 14 said: 15 "Focused advice on safeguarding policies dated 16 23 April 2018." 17 Ms Scott, I think, in fact, was the person who wrote 18 this memo, whom we heard from this morning. This 19 identified -- so you were sent various policies by the 20 Welsh Government because there were concerns about the 21 treatment of staff and whether they'd been suspended, 22 whether they should be suspended but weren't, et cetera, 23 et cetera. 24 Mr Rowlands, can you tell us what the conclusions 25 were -- what the purpose of this advice was and what</p> <p style="text-align: center;">Page 102</p>
<p>1 conclusions you reached about the policies and practices 2 of the school at that time? 3 MR ROWLANDS: After reviewing the policies, we were 4 sufficiently concerned to recommend that Welsh 5 Government ask us to make an actual visit to the school. 6 MS SCOLDING: Your concerns were about the fact that the 7 risk assessment lacked objectivity. The headteacher 8 believed the teacher to be innocent and pose no risk. 9 There was a lack of understanding of the nature of 10 grooming and sexual abuse. There had been delay in 11 responding to, I think, Denbighshire's concerns. And 12 the Welsh Government asked for an advice. 13 The result in that, here, if one goes to the bottom 14 of page _003, in fact, what you said at that time was, 15 on the basis of these policies, there is some evidence 16 to indicate that the school doesn't meet the 17 requirements of the Independent School Standards, and it 18 raises a question about the implementation of those 19 policies. That's right? 20 MR ROWLANDS: Yes. 21 MS SCOLDING: You and the Welsh Government, in effect, 22 decided that you should go in, and I think you then 23 carried out an inspection at that time, as I understand 24 it, Mr Rowlands. Is that right? 25 MR ROWLANDS: That's right. What we call a focused</p> <p style="text-align: center;">Page 103</p>	<p>1 inspection. That has a specific focus. We don't look 2 at all the standards, we just look at the relevant 3 standard. 4 MS SCOLDING: That particular inspection, which isn't in the 5 bundle, wasn't published. Can I ask, why don't you 6 publish focused inspections? 7 MR ROWLANDS: I think it is in the bundle. 8 MS SCOLDING: Is it? 9 MR ROWLANDS: 762. 10 MS SCOLDING: Fine. ETN000762. That's just me. 11 Can we get up ETN000762_003, please, Danny. I have 12 just put up "Strengths" and "Areas for development". 13 Again, can you tell us a little bit, Mr Rowlands, about 14 the conclusions of this particular inspection, please? 15 MR ROWLANDS: There was quite a long list of things that 16 they weren't doing, and, you know, we were expecting 17 them to put quite a lot of quite basic things in place, 18 such as training and those sorts of things, which we 19 subsequently looked at in the next inspection. 20 In terms of your previous question about why we 21 don't publish these, we do now, and that was one of 22 the learning -- one thing we learnt from this case, that 23 we should publish these, and we do now. 24 It was a historic reason, I suppose, why we didn't 25 publish these. We were requested by Welsh Government to</p> <p style="text-align: center;">Page 104</p>

<p>1 give them advice, so we considered this to be advice to                  2 Welsh Government. So that's what we did, and we didn't                  3 publish it. It was just advice to Welsh Government.                  4 They sometimes contained sort of personal detail                  5 that we wouldn't want to have in public domain, so we do                  6 publish them now, but we sort of redact those elements                  7 from it.                  8 We also put a little bit more background information                  9 there so it makes a little bit more sense for someone                  10 who is reading it in the public domain.                  11 MS SCOLDING: This report seems to identify that the                  12 policies are not necessarily consistent with the                  13 guidance; the procedures need to be -- for training need                  14 to be strengthened; there's no schedule of refresher                  15 training; there's no appropriate training for the                  16 principal or members of the council of management --                  17 that's the equivalent of governing bodies at the school;                  18 the note keeping doesn't meet the relevant requirements;                  19 case notes lack detail; school does not have suitable                  20 procedures to quality assure the effectiveness of                  21 arrangements; and the risk assessment within the                  22 particular case we were looking at, which was involving                  23 a staff member and concerns about his ability to keep                  24 children safe, didn't comply with the procedures.                  25 So we have that inspection. Ms Poole, I think you</p> <p style="text-align: center;">Page 105</p>	<p>1 went in around the same time because of the concerns                  2 that had been raised, and we have a copy of your report                  3 behind tab B2 at INQ004966. You made a number of                  4 recommendations. If we can get that up, at _004 over to                  5 _005. What has improved is a fairly short list; what                  6 needs to improve is a much lengthier list. Again, is                  7 this the usual number of good practice recommendations                  8 or is this a sign of significant weaknesses in a school?                  9 Is this the number of sort of "You need to improve" that                  10 you would usually do at any school or is this longer,                  11 and are the nature of these concerns fundamental in                  12 terms of the school's ability to understand and keep                  13 children safe?                  14 MS POOLE: It was obviously significantly more than the last                  15 inspection, because in "What's improved" there are only                  16 three bullet points there, so there were significantly                  17 more. This was a focused inspection which we did. We                  18 jointly planned the inspection with Estyn, so we were                  19 going in to look at a specific area, which was around                  20 safeguarding and concerns about the lack of action that                  21 had been taken in relation to the incident we have                  22 discussed.                  23 So this is more. Generally, in our inspection                  24 reports, we don't make recommendations in this way                  25 because we are identifying areas of non-compliance, but</p> <p style="text-align: center;">Page 106</p>
<p>1 obviously we can't do that in terms of independent                  2 schools that aren't registered with us.                  3 I mean, these are in a similar vein, so there were                  4 recommendations that are specific around specific issues                  5 around safeguarding and quality assurance and oversight,                  6 but there are a lot.                  7 MS SCOLDING: Yes. I was going to say, some of them seemed                  8 to be quite fundamental, in terms of the first one,                  9 "Must take steps to ensure that the service operates in                  10 line with the legislative framework". I think there                  11 were concerns that the school was, in fact,                  12 accommodating children all year round, but they were not                  13 registered as they would need to be with you as                  14 a children's home in that circumstance.                  15 MS POOLE: No, and that was a significant breach of the                  16 regulations in that case.                  17 MS SCOLDING: And the principal and members of the council                  18 of management must undergo safeguarding training; the                  19 principal and members of the council should ensure that                  20 policies and procedures are reviewed; risk assessments                  21 should comply with the relevant procedures; review the                  22 quality assurance; make sure that policies are                  23 consistently made available to staff working in house;                  24 policies should include an element that specifically                  25 addresses the boarding provision.</p> <p style="text-align: center;">Page 107</p>	<p>1 Now, just to indicate, this is a school which has                  2 a significant number of boarders, so it isn't a school                  3 where there's, like, half a dozen boarders so one maybe                  4 could oversee this. I suppose what I'm trying to say                  5 is, these are what I would call -- what one might call                  6 some quite basic problems with the school's                  7 understanding and practice of safeguarding. Would you                  8 agree or am I being overly harsh?                  9 MS POOLE: No, I think there were some fundamental issues,                  10 but I think we were spelling it out in a lot of detail                  11 because of the particular way that we felt our feedback                  12 was being received. We felt that we needed to spell it                  13 out perhaps in more detail than we would sometimes do,                  14 and so, in this case, it's kind of -- it's broken down.                  15 So there are no headline recommendations and                  16 requirements. We have kind of broken it down step by                  17 step because we felt we needed to do that.                  18 There was a significant challenge to this report.                  19 We have a factual accuracy process and we had quite                  20 a lot of pushback initially with this report, I think                  21 because we had made so many recommendations, which we                  22 stood by.                  23 MS SCOLDING: Yes. So when you said you had to spell it                  24 out, you were sort of quite -- why did you need to spell                  25 it out in quite so much detail?</p> <p style="text-align: center;">Page 108</p>

<p>1 MS POOLE: Because we weren't confident that the verbal  2 feedback we were given was being taken on board. So we  3 wanted to spell it out in black and white, in writing,  4 in a published inspection report, and we talked this  5 morning that, whilst we don't have powers to -- we have  6 no enforcement powers, putting a report into the public  7 domain is a lever for improvement in and of itself.  8 MS SCOLDING: So the reputational issues that can arise from  9 having a report which identifies the need to improve  10 some quite basic issues around child protection can  11 often be enough --  12 MS POOLE: Yes.  13 MS SCOLDING: -- to then improve things significantly?  14 MS POOLE: Absolutely. Reputation is all for a school like  15 this.  16 MS SCOLDING: Can I ask you about something else, Ms Poole,  17 as we see it. Can we go to INQ004966_006. Can we go to  18 the second paragraph down, which is about the  19 Independent Listener, which says that it was displayed  20 but the Independent Listener -- were displayed:  21 "We learnt, however, that they hadn't received any  22 induction, they had not seen key policies, they had not  23 received copies of the boarders' handbook, they did not  24 know about the National Minimum Standards for boarding  25 and they had not received any briefing on</p> <p style="text-align: center;">Page 109</p>	<p>1 confidentiality and they had not had any safeguarding  2 training."  3 MS POOLE: Yes. Obviously we are identifying that as  4 a significant shortfall. The Independent Listener  5 hadn't been there previously, so the fact there was an  6 Independent Listener was an improvement, but the fact  7 that that person had not had any induction was  8 a significant shortfall.  9 MS SCOLDING: How do you find -- we have heard quite a lot  10 about the Independent Listener service in England  11 because the National Minimum Standards in England also  12 require there to be an Independent Listener. The  13 view -- the impression given is that the Independent  14 Listener is maybe a service which children don't find  15 that helpful or don't use that often. Has that been  16 your experience as well?  17 MS POOLE: I can't comment from a personal experience point  18 of view. But I think it is a service that could be  19 strengthened.  20 MS SCOLDING: There are two sort of what I would consider to  21 be relatively critical reports of the school's approach  22 to safeguarding at that time.  23 Dr Jones, what, if anything, did you do upon receipt  24 of those reports?  25 DR JONES: We asked the school to submit an action plan to</p> <p style="text-align: center;">Page 110</p>
<p>1 us, providing details of the actions they were going to  2 take in response to those reports. When we received the  3 action plan, we sent the action plan to inspectorates  4 for comments.  5 MS SCOLDING: Do you think it was sufficient just to send an  6 action plan? This is a situation whereby there was  7 potentially a very serious breach of the relevant  8 regulations, in that children -- it wasn't a registered  9 children's home and it should have been. The school, as  10 I understand it, according to Mr Rowlands, had exceeded  11 its number and age range. So their number on roll was  12 only 193 but the school, in fact, had 360 pupils and had  13 children below the minimum age that they were currently  14 registered for, and there were some quite basic problems  15 with, really, a lack of understanding of how to  16 implement the architecture of child protection which is  17 essential in order to provide the relevant assurance to  18 parents that children will be kept safe.  19 With the benefit of hindsight, do you think maybe an  20 action plan -- maybe more draconian steps could have  21 been taken, if that's possible, or is that one of  22 the problems with the current regulatory system as it  23 operates, that, really, it is an action plan or closure  24 and there isn't really anything in between?  25 DR JONES: It is a weakness in the current system. So at</p> <p style="text-align: center;">Page 111</p>	<p>1 the moment we have nothing in between an action plan and  2 deregistration. So it's a very draconian measure  3 against a school. The action plan that we had into  4 them -- sort of had in from them suggested that they  5 were making changes. We also had a number of  6 retrospective elements to their terms of registration  7 and the feedback we were having from other sources was  8 that they were actually making improvements to the  9 system. But, in short, there is nothing that we can do  10 in between an action plan and a deregistration of  11 school, and of course deregistration is --  12 MS SCOLDING: That's sort of the nuclear option.  13 DR JONES: Absolutely.  14 MS SCOLDING: Also, it potentially harms students -- it  15 could harm their welfare and it could harm their  16 academic progress. Do you think there should be a more  17 sophisticated, shall we say, or a more nuanced range of  18 options open? Because it seems to me that an action  19 plan is a bit weedy, if I'm being completely honest, for  20 these kinds of regulatory failures, but you wouldn't  21 necessarily want to close the school. You'd want to  22 issue maybe some kind of warning or provide some kind of  23 more obvious oversight. Dr Jones, do you have any view,  24 and then I see Mr Rowlands nodding and Ms Poole nodding  25 and Professor Holland. So I'm going to bring you all in</p> <p style="text-align: center;">Page 112</p>

<p>1 here. Dr Jones, firstly for you?                  2 DR JONES: Yes, I think it is definitely a weakness within                  3 the current system. It is -- and Mr Heaney said this                  4 morning that this is something that we have confirmed we                  5 are looking at.                  6 It would need primary legislation to change this,                  7 which of course is a very timely --                  8 MS SCOLDING: Yes.                  9 DR JONES: So we would look to try and find ways of getting                  10 around that in the short term, so that there's something                  11 in between now and when we get to the position where                  12 primary legislation is needed. We are very open to                  13 working with our stakeholders to try and find what                  14 additional levers we can put into the system. But, in                  15 short, it is not easy. I'm not sure I have viewed                  16 anybody with a cast-iron system that is guaranteed to                  17 work.                  18 MS SCOLDING: Mr Rowlands, I saw you nodding your head. Do                  19 you have anything you would like to add about the                  20 current ability of the system to be able to operate                  21 appropriate regulatory levers to get compliance without                  22 necessarily harming the education of children?                  23 MR ROWLANDS: I think we all agree that -- I think there's                  24 general consensus that there should be more levers.                  25 I think the most obvious comparison is with maintained</p> <p style="text-align: center;">Page 113</p>	<p>1 schools.                  2 MS SCOLDING: Yes.                  3 MR ROWLANDS: So the powers that a local authority has,                  4 there's a whole range of powers they can apply. Now,                  5 obviously the situation is different and I'm not saying                  6 you can cut and paste that legislation, but similar                  7 sorts of powers would be the sort of thing that Welsh                  8 Government would need.                  9 MS SCOLDING: Do you think it is appropriate -- one of                  10 the issues obviously is they are independent schools.                  11 They are not funded by the state. I mean, some of their                  12 pupils, if they have got the Welsh equivalent of                  13 Education and Healthcare Plans, which I think are still                  14 called statements but I know are in the process of                  15 changing under the legislation, which I know has just                  16 been introduced in Wales, but it does cause                  17 difficulties, and, Dr Jones, maybe I'll ask you as the                  18 representative for the Welsh Government, because there                  19 are potentially more limited levers in terms of                  20 statutory oversight in terms of -- obviously, in                  21 a maintained school you can literally go in and replace                  22 the entire governing body.                  23 Have you thought about, or sought any legal advice                  24 about, how you might be able to regulate without                  25 unnecessarily interfering in somebody's articles and</p> <p style="text-align: center;">Page 114</p>
<p>1 possessions under, for example, the ECHR?                  2 DR JONES: This is something we are looking at, actively                  3 looking at. We were starting to get into the detail                  4 just as COVID struck, unfortunately, which meant we have                  5 had to curtail our investigations into that particular                  6 issue. But, yes, in short, it is something that we are                  7 going to look at to see if there are more levers that we                  8 can give ourselves.                  9 MS SCOLDING: Ms Poole, do you have anything you would like                  10 to add about the oversight that the Welsh Government has                  11 and whether or not you, as the Care Inspectorate                  12 Wales -- I know you have quite extensive enforcement                  13 powers when it comes to children's homes. Ofsted in                  14 England have, in effect, said to us, "Well, we would                  15 quite like the powers we have in respect of children's                  16 homes, to have them in respect of education". Do you                  17 have any view as to whether or not the Welsh Government                  18 remains the appropriate enforcement body or whether you                  19 would like that enforcement body -- those enforcement                  20 powers? I will ask the same question to Mr Rowlands as                  21 well.                  22 MS POOLE: I think it is a fundamental difference between us                  23 and Ofsted in that we don't inspect education, so you                  24 don't get the whole package with us, so we are about                  25 care and support and we are a social care regulator. So</p> <p style="text-align: center;">Page 115</p>	<p>1 in terms of residential special schools, yes, we want                  2 that across the suite of residential special schools                  3 regardless of days. But not for boarding schools                  4 because we are not anybody who can register and enforce                  5 around the education element, so that wouldn't be                  6 appropriate for us. But I think we have got levers in                  7 the Regulation and Inspection of Social Care Act that                  8 could be similarly applied so we can remove                  9 a responsible individual who is registered -- who is                  10 designated with us as fit. If we don't think they are                  11 fit, they can be removed. The same with local                  12 authorities, actually, we have powers of inspection to                  13 review the functions of Social Services. If we think                  14 they are failing significantly, we inform ministers, who                  15 can write a formal warning notice and put in an                  16 improvement and assurance board if that's what they                  17 think is needed in terms of a local authority. So                  18 I think there are parallels in terms of the powers that                  19 we have that could be applied.                  20 MS SCOLDING: It sounds, Dr Jones, as if, in fact, the Care                  21 Inspectorate Wales has got enforcement powers which had                  22 similar abilities to, in effect, replace individuals in                  23 private institutions without there being any particular                  24 concerns. So that might be something we can take away                  25 from today.</p> <p style="text-align: center;">Page 116</p>

1 Mr Rowlands, do you have any view about the Welsh  
2 Government, whether you would like to steal the Welsh  
3 Government's crown, so to speak, and become the  
4 regulator as well as the inspector?  
5 MR ROWLANDS: No, we don't want to steal their crown. We  
6 are different from CIW in Wales and Ofsted in England in  
7 that we don't have any regulation -- regulatory powers  
8 at all. Obviously, if people feel very strongly that we  
9 should be, you know, we are civil servants, we would do  
10 it. But we don't think we should have it.  
11 The practical problem is, we are not set up as  
12 a regulator, we are a purely inspectorate. So there's  
13 those practical issues. It would be much easier for  
14 another body to be -- I think, also, there is more kind  
15 of a theoretical reason as well; I think there is some  
16 advantage in separating out the inspectorate from the  
17 regulatory authority.  
18 MS SCOLDING: Thank you. Professor Holland, you have waited  
19 very patiently. I wanted to ask you about the adequacy  
20 of the current regulatory levers, whether they are from  
21 the Welsh Government or the CIW, in managing children in  
22 the independent and boarding sector. Thank you.  
23 PROF HOLLAND: I think they're clearly hugely inadequate at  
24 the moment, and this case with this school has  
25 particularly highlighted that and brought it to the

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1 to get on and see what could be done, both to make sure  
2 that this young person had justice for the concerns  
3 she'd brought forward, but also because I know how long  
4 it takes to plug regulatory gaps.  
5 I think it was -- you know, for me, it was quite an  
6 astounding meeting that I held to see how powerless all  
7 these very powerful people really felt in this case, and  
8 it really highlighted the gaps in the regulation, and  
9 just as you have described, there's nothing between  
10 advising the school, really, as to what they should do,  
11 reporting to government and others and to the school  
12 about what should happen and removing the registration,  
13 and that's an enormous gulf in terms of action and  
14 I would be strongly in favour of the regulations being  
15 strengthened so that interim steps could be taken, such  
16 as bringing in an improvement board on a temporary  
17 basis, or, indeed, appointing new members to a governing  
18 body or a board of trustees who have the right and  
19 relevant experience.  
20 One thing that you have mentioned briefly before,  
21 but not in this context, is, of course, the other huge  
22 gap is the lack of requirement for registration of  
23 teachers with the Education Workforce Council, and it  
24 was clear to me immediately in this case how differently  
25 this case would have played out for a teacher, and

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1 fore. If I could take you to the meeting I convened  
2 on November 7 last year, I called that meeting because  
3 we'd been involved with the case after the young person  
4 had contacted us in the September and we had done our  
5 usual -- taken our usual steps, which was to contact all  
6 the people involved, because she was concerned that her  
7 very serious allegations had not led to the headteacher  
8 being dismissed. So we followed our usual method of  
9 following up with the various agencies involved to find  
10 out what had happened, what decision was being made and  
11 whether they had followed all the right procedures.  
12 At every turn, with every agency I contacted -- the  
13 local authority, the government, CIW and Estyn -- I was  
14 hearing that, actually, they were stuck. There was no  
15 more that they could do, except, as you, yourself, put  
16 it quite colourfully, press the nuclear button. You  
17 know, that's obviously -- that also could affect the  
18 well-being of hundreds of children. So it is a huge  
19 step.  
20 So I decided to call a multi-disciplinary meeting,  
21 not to start investigating the case again, because  
22 I didn't want to interfere with the part IV proceedings  
23 that were still ongoing at that point. But I felt that  
24 it couldn't wait until the end of that to actually see  
25 what was happening with these regulations. I wanted us

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1 a headteacher, indeed, in a maintained school, because  
2 the Education Workforce Council would have been able to  
3 act straight away.  
4 You know, the disappointing thing about this,  
5 I think, is, this is a gap that's been known for many  
6 years. Back in 2016, a consultation was held and the  
7 clear results of that consultation were that this change  
8 should happen. At that point, we had a change of  
9 government, so the outgoing minister said, "I'll leave  
10 it to the next government to take action on this". Our  
11 education department and our education minister have  
12 been taking us through some huge reforms at pace in  
13 Wales, and unfortunately, in many other areas, from  
14 curriculum to (inaudible) reform, but, unfortunately,  
15 this has gone again to the bottom of the pile.  
16 I was very concerned to find out the history of this  
17 and how this would have been one of the things that  
18 should have happened, of course, and also the  
19 regulations are very out of date, 2003, and, again -- so  
20 these weren't new issues, in a way, they'd just come to  
21 the fore.  
22 So although, in many ways, it's very understandable  
23 that in the current pandemic the decision to proceed  
24 with reforming the regulations has not been able to  
25 proceed this year, I feel it's very disappointing

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1 because of that long history. This isn't something that  
 2 we suddenly discovered last November was a gap. It was  
 3 a gap that we have known for some time and that's why  
 4 I'm independently reviewing the decision to drop the  
 5 reform -- the Education Workforce Council's reform as we  
 6 speak.  
 7 MS SCOLDING: I think your voice is coming across loud and  
 8 clear. What I would say is, everybody this morning also  
 9 agreed that there needed to be reform. But I think  
 10 you're urging that reform, especially as it appears to  
 11 be agreed between everyone. It appears to be  
 12 a relatively uncontroversial reform, at least from the  
 13 people who are sitting in front of me today, that that  
 14 should happen sooner rather than later, given the length  
 15 of time it can take to pass legislation, which is  
 16 a year, usually, at best.  
 17 PROF HOLLAND: Which is why, last November, I did raise it  
 18 with urgency with the minister in writing, who did  
 19 respond in the early part of this year, saying that they  
 20 would take steps forward on this, which, at the time,  
 21 reassured me. But obviously we haven't got much  
 22 further, although my understanding from Dr Jones'  
 23 department is that there is background work going on in  
 24 anticipation of what is now going to be another election  
 25 and we know another change of minister because the

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1 terms of safeguarding. In my statement, paragraph 35,  
 2 it gives you the evidence for -- from the actual  
 3 evidence base that we used to look at safeguarding.  
 4 I mean, obviously we have to inspect fairly and  
 5 objectively, and the school certainly had a large number  
 6 of good features, and indeed excellent features. So we  
 7 are obliged to report fairly on the school and that's  
 8 how the inspectors saw the school.  
 9 In terms of safeguarding, that paragraph 35 --  
 10 MS SCOLDING: Maybe we should get it up, Mr Rowlands. It  
 11 would be helpful, I think. It's ETN000759\_008-009. If  
 12 you could maybe highlight the entirety of paragraph 35.  
 13 Mr Rowlands, is that helpful?  
 14 MR ROWLANDS: Thank you. As you say, we had this long  
 15 shopping list of shortcomings we were worried about in  
 16 terms of safeguarding, and we decided to move the core  
 17 inspection forward. We were sufficiently concerned  
 18 about it. So it is a judgment, then, when should you  
 19 have a full inspection of the school. So we were really  
 20 concerned, so we moved it on really quickly, I think  
 21 nine months is probably the minimum we could possibly  
 22 give the school to actually act on that long list of  
 23 things they should put.  
 24 You know, as you said, originally, we didn't feel  
 25 that they were taking safeguarding seriously, but

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1 current one is stepping down.  
 2 MS SCOLDING: She's stepping down, isn't she, yes, from the  
 3 Welsh Assembly.  
 4 PROF HOLLAND: Yes.  
 5 MS SCOLDING: Thank you very much, Professor Holland.  
 6 That's very helpful.  
 7 As a result of the action plan, there was a further  
 8 inspection by yourself, Mr Rowlands, in February 2019,  
 9 which is behind tab B1 of the bundle. Danny, can we get  
 10 up, please, INQ004965\_003. What I don't really  
 11 understand is that this is glowing, Mr Rowlands.  
 12 Outstanding outcomes in public examinations; extremely  
 13 positive attitudes to their learning and high levels of  
 14 well-being; positive impact; effective; cohesive  
 15 community; valuable help; the principal provides astute  
 16 and assured leadership and he sets a clear strategic  
 17 vision, and he meets all the school standards, including  
 18 well-being and attitudes to learning being excellent.  
 19 Given what we looked at less than a year previously,  
 20 and Ms Poole's and yourselves' kind of shopping list of  
 21 quite basic concerns, how could the school have gotten  
 22 "excellent" for well-being and attitude to learning?  
 23 MR ROWLANDS: As you say, we were really concerned when we  
 24 did the focused visit, and, as you say, both ourselves  
 25 and CIW had a long list of things they should address in

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1 I think this list gives you a flavour of the progress  
 2 the school had made in a very short period of time.  
 3 MS SCOLDING: Okay.  
 4 MR ROWLANDS: So they addressed all the training issues at  
 5 various levels, they'd appointed a new safeguarding  
 6 lead, they'd reviewed their policies, they'd addressed  
 7 the gaps and the weaknesses that we'd identified, so  
 8 they'd done all of those things. And we felt that this  
 9 showed a change of heart in terms of safeguarding.  
 10 MS SCOLDING: I suppose what I would say is, I don't see  
 11 anywhere there in that list of bullet points anything  
 12 about a change in the head's approach and attitude. We  
 13 heard from Ms Poole that when the report was published,  
 14 there was a significant degree of pushback. That was  
 15 from the governors and various other people, including  
 16 the principal.  
 17 What I don't see here, other than the fact that the  
 18 principal had previously attended a level 3 safeguarding  
 19 course and one had been organised, I haven't seen  
 20 anything which addresses the concerns about leadership  
 21 and management, so to speak, or the approach to issues  
 22 such as grooming.  
 23 MR ROWLANDS: As we previously said, we didn't have any  
 24 indication of the principal being personally, you know,  
 25 an area where we should have a line of enquiry into.

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<p>1 But I think, you know, nothing would have been done in                  2 that school unless the head had agreed to it, and                  3 I think the amount of progress they made in a short                  4 period of time did indicate that the school, including                  5 the head, was taking this work seriously -- this aspect                  6 of their work seriously.                  7 MS SCOLDING: Obviously, you have to inspect against the                  8 standards that you are given, and the Independent School                  9 Standards, and in this case it is standard 3(2)(b). Is                  10 it the case -- could we have a quick look at the current                  11 Independent Schools Standards, please, Danny,                  12 ETN000760_010, which is standard 3. This is the current                  13 standard. Mr Rowlands, if that would be helpful for                  14 you, it is behind tab B25 of my bundle, in any event.                  15 So this is the current standard. Is this standard                  16 enough or does it need to be changed considerably?                  17 MR ROWLANDS: I think we've heard that some of these                  18 regulations can be overly complex and we could maybe                  19 simplify them. I think we've already said there should                  20 be more emphasis on the leadership and management and                  21 the ethos. But, you know, in this particular school --                  22 I don't know whether you're coming to this later on --                  23 the problem was the degree of sort of organised                  24 concealment that was going on, and the control that the                  25 head had over the whole system, so there was no</p> <p style="text-align: center;">Page 125</p>	<p>1 likelihood of any of the children or the staff                  2 disclosing some of the behaviour.                  3 MS SCOLDING: So it wasn't so much the fact that you weren't                  4 able to inspect because the regulations didn't allow you                  5 to inspect child protection; it was the issues that we                  6 are going to come on to talk about potentially just                  7 after the mid-afternoon break were not matters which                  8 could have been identified by inspectors unless somebody                  9 had, in effect, blown the whistle?                  10 MR ROWLANDS: Yes, that's right. That was definitely the                  11 case, I would say, in this particular case. That                  12 doesn't mean that, you know, some strengthening of                  13 the standards wouldn't help.                  14 MS SCOLDING: Chair, I note the time. We have gone one                  15 minute over 2.45 pm. Might this be an appropriate                  16 moment for our afternoon break?                  17 THE CHAIR: Yes, we will return at 3.00 pm.                  18 MS SCOLDING: Thank you very much. Thank you all.                  19 (2.46 pm)                  20 (A short break)                  21 (3.00 pm)                  22 MS SCOLDING: If we now go to what happened when the text                  23 messages were discovered, in the summer of 2019, the                  24 local authority began an investigation because some text                  25 messages had come to light between the then principal,</p> <p style="text-align: center;">Page 126</p>
<p>1 Mr Belfield, and a pupil who had come to the attention                  2 of the local authority.                  3 The referral was made as a result of the concerns                  4 about the inappropriate nature of the texts, and we have                  5 a witness statement from Ms Stubbins, who is the                  6 Director of Social Services for Denbighshire, who --                  7 Danny, DEN000034_004, paragraph 3, which sets out the                  8 nature of the concern in broad terms. The initial                  9 concern was as a result of the referral. The referral                  10 was made. Texts between a teacher and a pupil.                  11 However, on further investigation -- this was a sixth                  12 form pupil. However, further investigation quickly                  13 revealed further and more wide-ranging concerns. Not                  14 only were the contents inappropriate, the frequency,                  15 duration and timing of texts were of concern.                  16 I understand text messages were sent in the night or in                  17 the very early morning. Investigations further                  18 revealed: the approach taken by the principal,                  19 Mr Belfield, to discipline; the school's approach to                  20 medication; the school's handbook was in breach of                  21 the Equality Act, making reference to the fact that any                  22 boarder who developed mental health issues would be                  23 asked to leave; the school's approach to mental health,                  24 and in particular a longstanding opposition and refusal                  25 to work with CAMHS; the general welfare of the pupils,</p> <p style="text-align: center;">Page 127</p>	<p>1 who felt their place at the school was dependent upon                  2 complying with the wishes of the principal; an                  3 atmosphere of power and coercion, as Mr Rowlands                  4 identified, by the principal over pupils and staff                  5 members.                  6 I don't think we need to go into the texts and                  7 I don't wish to get them up, but a selection of a text                  8 that was sent was, for example, a text that says, "There                  9 are so many beautiful girls here", sent from the                  10 principal, I believe when he may have been abroad                  11 visiting somewhere, "But I am faithful to my wife. The                  12 girl sat next to me is a model, I think. She's pretty,                  13 so she must be thick", or that Rachel Riley, the                  14 well-known television presenter from Countdown, "has                  15 disproportionately ridiculous breasts. Not my type."                  16 Those are a selection of some of the texts sent from                  17 the principal of a school to a sixth form student.                  18 As I understand it, Mr Rowlands, both you and                  19 Ms Poole became involved in attending strategy meetings.                  20 Mr Rowlands, is that right?                  21 MR ROWLANDS: Yes, it is. As I said earlier, we had good                  22 relationships by now with Denbighshire and they alerted                  23 us to this.                  24 MS SCOLDING: They alerted you to this. You attended the                  25 strategy meetings. As I understand it, the chair of</p> <p style="text-align: center;">Page 128</p>



1 the management council or management committee  
 2 identified that there would be some form of independent  
 3 investigation and some form of independent report into  
 4 what had gone on, or hadn't gone on, in respect of all  
 5 the number of allegations.  
 6 Mr Rowlands, were you happy with that as an  
 7 approach?  
 8 MR ROWLANDS: I think we were, yes. I don't recall the  
 9 detail but I think we were.  
 10 MS SCOLDING: Ms Poole, how about you? What did you think  
 11 of that approach?  
 12 MS POOLE: I think there were some initial concerns about  
 13 the level of independence, because, originally, I think  
 14 the original suggestion was that it was going to be  
 15 a governor who did the investigation, and that was felt  
 16 not to be independent enough, and there was some  
 17 backwards and forwards discussions with the school about  
 18 who -- what constituted independence. So initially not.  
 19 But afterwards, yes.  
 20 MS SCOLDING: As I understand it, I mean, it is absolutely  
 21 clear that there were no criminal offences committed  
 22 here. However, I think what was as concerning, which  
 23 emerged from the investigation, was not necessarily the  
 24 texts but what that showed about the atmosphere at the  
 25 school and the controlling patterns of behaviour which

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1 I think both yourself and Mr Rowlands were particularly  
 2 concerned about. In particular, I understand there were  
 3 concerns that in some of the text messages -- or there  
 4 appeared to be an issue that the principal considered  
 5 himself to be the legal guardian of the boarders and,  
 6 therefore, was able to have more of a familial  
 7 relationship, shall we say, and to speak to them or text  
 8 them and engage in private conversations with them in  
 9 a way that other members of staff would not have been  
 10 permitted to do. Is that right, Ms Poole or Mr Rowlands  
 11 or Dr Jones?  
 12 MS POOLE: That is how he saw himself. I'm not sure that it  
 13 was just his status as guardian that did that, because  
 14 he'd exempted himself from any of the policies and  
 15 procedures that said you shouldn't do that as principal.  
 16 MR ROWLANDS: I think that -- we had some concern as well  
 17 about the clarity about what is meant by "harm".  
 18 MS SCOLDING: Yes.  
 19 MR ROWLANDS: Because sometimes it was said, "Well, there  
 20 wasn't a harm" or, "There wasn't a risk of harm", and we  
 21 found this difficult to comprehend, because clearly  
 22 there was emotional abuse, so the definition of "mental  
 23 harm" and what constitutes abuse I think does need  
 24 a certain amount of clarification around this idea of  
 25 coercive control.

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1 MS SCOLDING: Professor Holland, you have put your hand up  
 2 and I was about to come to you to say that, at about the  
 3 same time as the text -- as Denbighshire were involved,  
 4 in fact, quite separately, a young woman came and  
 5 approached you after you'd given a talk about the  
 6 UN Convention on the Rights of the Child and disclosed  
 7 to you, at a slightly later date, that she was concerned  
 8 about the actions of Mr Belfield, and you set out the  
 9 nature of those allegations at paragraph 2.1 of your  
 10 witness statement. Danny, would you mind getting up  
 11 CFW000015\_003.  
 12 If we can get those up. Danny, would you mind  
 13 enlarging 2.1? These are the messages. This is -- he  
 14 started messaging her on Instagram, where she'd been  
 15 spending an increasing amount of time. Reference to the  
 16 female's physical appearance, physical appearance of  
 17 others. I have read out some selection of those. Then  
 18 Mr Belfield made the female pupil a full boarder without  
 19 referring to the management of the school. Insisted an  
 20 accompanying her to see her therapist. Refused to allow  
 21 her to take medication. Insisted that he be present  
 22 when she saw her social worker. And the rest of that is  
 23 then irrelevant.  
 24 Professor Holland, when those disclosures were made  
 25 to you, what did you do?

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1 PROF HOLLAND: At that point, I met the young woman in  
 2 a group setting, as you've mentioned already, when  
 3 I talked about my role and about rights, and I do  
 4 remember one of the young people present asking whether  
 5 all these rights applied in private schools as well, and  
 6 I now know it was the same young woman, and I said,  
 7 "Yes, they certainly do. Everyone has the same rights,  
 8 no matter what". A few weeks later, I received a very  
 9 long letter from the young woman, from the girl, with  
 10 these details in, and of course we immediately -- the  
 11 same day, because of the serious nature of  
 12 the safeguarding concerns, took action to contact the  
 13 local authority to check that they were aware of it and  
 14 they were taking action, which they assured us they were  
 15 and explained about where they were at in the process,  
 16 and we also spoke to people who were looking after her  
 17 at the time to make sure she was all right.  
 18 From that point on, I had, really, three clear goals  
 19 as to what to do in this situation. The first was to  
 20 ensure that the young -- the girl herself was safe and  
 21 being looked after and her well-being being safeguarded  
 22 because it was quite clear that this had had an enormous  
 23 impact on her -- this is what she told us in the  
 24 letter -- and she herself was extremely disappointed and  
 25 worried and concerned about the lack of action that had

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1 been taken as a result and the fact that the headteacher  
2 had not been dismissed and could be a risk to others.  
3 So she was our first concern, of course:  
4 My second concern was to make sure all the agencies  
5 would do all the things they should do. My main role is  
6 to make sure that others do the right investigations.  
7 It is not in my legislation for me to investigate at the  
8 same time as others. So I made sure that everyone was  
9 doing the things they should do and I was assured and  
10 given evidence that a process was being gone through.  
11 Then the third thing, as I have already discussed  
12 earlier this afternoon, was to identify the evident gaps  
13 in regulations that were allowing this situation to go  
14 on for a painfully long time for this girl.  
15 The reason I raised my hand just now, because  
16 I wanted to mention the independent -- the quality of  
17 the independent investigation from my point of view.  
18 MS SCOLDING: Yes.  
19 PROF HOLLAND: So I became aware that an independent  
20 investigation had been commissioned, which, you know,  
21 was the correct process, and had reported and that, as  
22 a result of the report, the headteacher had not actually  
23 been dismissed.  
24 MS SCOLDING: Yes.  
25 PROF HOLLAND: Indeed, had returned to the school, and the

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1 a proper independent guardianship system, so the head  
2 had set himself up as a guardian, so they didn't have --  
3 I believe there was an Independent Listener, but we have  
4 already heard there were flaws in that as well.  
5 So I felt that these young people were being  
6 discouraged from sharing any mental health issues, and  
7 indeed this young person had been discouraged or banned  
8 from taking medication that she had been prescribed for  
9 her mental health.  
10 So there were additional concerns for me, having  
11 read the report; and the report gives great detail about  
12 concerns staff had about the head's attitude as well.  
13 And yet the conclusions of that independent  
14 investigation were that the headteacher did not  
15 represent a risk to children.  
16 I'm sorry, I'm quoting now from memory, and I think  
17 he said that the -- the independent investigators also  
18 said there was no reason he wasn't suitable to work with  
19 children, or at least that was what the witnesses had  
20 said, although they did say he had a disciplinary case  
21 to answer. So I was really concerned about the quality  
22 of that investigation which really reinforced for me  
23 wider concerns I have, actually, about independent  
24 investigations in Wales where there are allegations  
25 against staff, something that I've raised with

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1 girl who we remained in touch with, have remained in  
2 touch with, was very concerned, as you might imagine,  
3 about this, as was I, knowing the nature of  
4 the allegations that had been made.  
5 You know, we had seen screenshots of these messages,  
6 so they were really -- it was really solid evidence.  
7 So I asked the school for a copy of  
8 the investigation itself. Initially, they were --  
9 I think, quite rightly, they asked for the legal powers  
10 which I was using to request this very sensitive  
11 information. I provided them with the legal basis of my  
12 request, and they did indeed present me with an  
13 unredacted copy of the report, which I believe the local  
14 authority had not, at that point, been themselves shared  
15 with, they had only had a redacted copy at that point.  
16 And I read the whole report and wrote my own analysis of  
17 it. It was a very full report which brought up lots of  
18 new concerns for me further to the concerns that the  
19 young person had raised with me, particular concerns  
20 about the controlling nature and the attitudes to mental  
21 health in particular. I was very concerned that young  
22 people were being discouraged from disclosing mental  
23 health issues and, you know, we are talking about most  
24 of the boarders being a long way from home, from  
25 overseas, and we have already established there wasn't

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1 government -- in fact, in my current most recent annual  
2 report.  
3 The first Children's Commissioner -- I'm the  
4 third -- conducted a very large case review which I have  
5 presented --  
6 MS SCOLDING: Which you mentioned in your witness statement,  
7 yes.  
8 PROF HOLLAND: Yes, the Clywch Inquiry about alleged sexual  
9 abuse by a deceased teacher of children in a maintained  
10 school. The lack of an independent investigation in  
11 that case was evident and was one of the recommendations  
12 of the report, and the government put in -- the Welsh  
13 Government did put in a system after that inquiry for  
14 independent investigation.  
15 More recently, we have had concerns, as an office,  
16 about the means of local authorities to carry out  
17 investigations or to commission others to do so after  
18 the government stopped funding one company to do it.  
19 I don't have any strong feelings about which company  
20 should do it, but I do feel local authorities should be  
21 able to draw on a company with real expertise in these  
22 matters in order to commission, quickly, independent  
23 investigations, and that the same should be true for  
24 independent schools, of course.  
25 So I was very concerned that, faced with all of this

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<p>1 evidence, any person with real experience of issues of 2 grooming and sexual abuse would come to a conclusion 3 that this teacher was suitable to work with children. 4 MS SCOLDING: Maybe it would be helpful, whilst you have 5 been helpfully talking about your concerns about 6 independent investigations, do you think that, in these 7 sorts of circumstances, therefore, there should always 8 be an independent investigation -- where there are 9 allegations of alleged abusive behaviour by a member of 10 staff concerning pupils at the school, that the school 11 should always commission, or whoever it is who is 12 responsible should always commission an independent 13 report? Is that something you think that's necessary? 14 PROF HOLLAND: It is, and that would be expected in 15 maintained schools in Wales. 16 MS SCOLDING: If we go to the conclusions that the 17 particular reviewer made of this report, it is 18 DEN000033_119. Safeguarding concerns. So this is the 19 conclusion: 20 "Consider whether TB has behaved in a way 21 [Mr Belfield] that has harmed a child or may have harmed 22 a child; behaved in a way that he would pose a risk of 23 harm; behaved in a way that indicates he would be 24 unsuitable." 25 Then it says "Facts established" and then it says,</p> <p style="text-align: center;">Page 137</p>	<p>1 "Does not pose a risk of harm; does not indicate that he 2 is a risk to children; does not indicate that he is 3 unsuitable to work with children." 4 Professor Holland, I'm just sort of getting up what 5 you had already said from memory which caused you 6 concern. 7 Ms Poole, can I turn to yourself and Mr Rowlands 8 now. Had you seen a copy of this investigation report 9 or had there been any negotiation or discussion with you 10 about the nature of this report and who should be doing 11 it? 12 MR ROWLANDS: I think we were all in a similar situation to 13 Professor Holland. We all struggled to get the report 14 and then, when we got it, it was very heavily redacted. 15 Eventually, when we saw it, we were in disagreement with 16 it. What we did was, we advised that the part IV should 17 be re-established to investigate further because, you 18 know, we weren't satisfied with the position we'd got 19 to. 20 MS SCOLDING: Ms Poole, do you have anything you wish to add 21 to that? 22 MS POOLE: No. I would echo that. I think the problem with 23 us getting an unredacted copy, which took lots and lots 24 of correspondence, speaks to our lack of powers to 25 actually request information, which we can do for those</p> <p style="text-align: center;">Page 138</p>
<p>1 services that we regulate, who would have had to provide 2 it to us. We didn't have those powers in this case. 3 MS SCOLDING: Dr Jones, does the Welsh government not have 4 those powers, to ask for an unredacted copy? Does it 5 have those powers to ask independent schools to provide 6 copies of relevant documentation, or does it not have 7 those powers at the moment? 8 DR JONES: It doesn't. We did ask for an unredacted copy. 9 What we got is a very heavily redacted copy. 10 MS SCOLDING: So even though you are the people that could 11 ultimately have oversight -- I mean, would you have had 12 to issue some sort of litigation proceedings in order to 13 get an unredacted copy, do you think? 14 DR JONES: I think we probably would have -- we would have 15 had to probably arrange a meeting with the chair and 16 actually gone up the -- whether they would have provided 17 the document when we were there is a different matter. 18 I think taking a personal touch might have been one 19 thing that we could have tried. 20 MS SCOLDING: But you don't have any powers at the moment to 21 sit there and say, "Some serious allegations have been 22 made. The local authority is investigating. As the 23 regulator, we want to see unredacted copies of these 24 reports so that we can understand the unvarnished 25 concerns and the unvarnished investigation"; is that</p> <p style="text-align: center;">Page 139</p>	<p>1 right? 2 DR JONES: Yes, that's right. We can ask, but they don't 3 have to provide. 4 MS SCOLDING: Thank you. There were two other issues 5 I wanted to raise with all of you which raise some 6 general issues about issues to do with guardianship and 7 the role of teachers and members of staff when looking 8 after children, particularly international students, 9 which came up in phase 1 of our investigation. 10 Danny, would you mind getting up DEN000033_006 over 11 to_007, please. There are a number of issues which 12 arise here. Can you please highlight "Social media" and 13 "Guardian arrangements" and "Access arrangements" and 14 then the rest of it doesn't need to be on -- down to the 15 end of paragraph 20, please. Thank you. This was the 16 position as the independent investigator found it: 17 "The school's social media policy prohibits staff 18 from contacting students ..." 19 That's a quite standard policy that most schools 20 operate: 21 "However, an exception is made for TB as the 22 principal and the school's DSP and head of boarding on 23 the basis that the school is an international boarding 24 school and because TB is the guardian. The school 25 understands that, as a guardian, he conducts his</p> <p style="text-align: center;">Page 140</p>

<p>1 relationship with those students generally through                  2 messaging and he considers that this element of                  3 the relationship to be more akin to a parent role than                  4 that of a principal role.                  5 "An anonymous referral has also been made in                  6 relation to another pupil.                  7 "Guardian arrangements.                  8 "TB considers himself to be the guardian for all                  9 boarders at the school. TB has referred to himself as                  10 the UK parent for boarders at the school.                  11 "The policy by which TB is regarded as the guardian                  12 of all the boarders rather than the school using                  13 guardian agencies was introduced in September 2008."                  14 Then it seems parents of overseas boarders have to                  15 sign a parental responsibility form in that TB will                  16 personally be responsible for their child's welfare and                  17 to delegate that. The precise ambit of the delegation                  18 is not made as clear as it could be.                  19 Following the concerns, documents signed by UK                  20 boarders and overseas boarders are different. To date,                  21 no documents of the kind signed by the parents of UK                  22 boarders have been traced in the case of [irrelevant].                  23 TB is required to give permission to any boarder to stay                  24 anywhere off the school site overnight. During term                  25 time and in the event that boarders stay at the school</p> <p style="text-align: center;">Page 141</p>	<p>1 for the holidays, they are not allowed to stay away from                  2 school for any period of time unless accompanied.                  3 Can I just double-check with Ms Poole, do the                  4 National Minimum Standards for residential schools                  5 require you, when looking at boarding welfare, to                  6 examine the appropriateness of any guardianship                  7 arrangements?                  8 MS POOLE: Guardianship arrangements are in the national --                  9 can you hear me?                  10 MS SCOLDING: Yes, I can.                  11 MS POOLE: Sorry, they are in the National Minimum Standards                  12 but we are not required to look at that. We do look at                  13 it in the mix of a whole range of things. I think what                  14 Ruthin School has taught us is it's something we need to                  15 scrutinise in more detail.                  16 MS SCOLDING: So you haven't identified or noticed this                  17 policy which seemed to identify -- if we can be clear,                  18 there are a large number of boarders at this school that                  19 come from abroad so it is not a situation of Mr Belfield                  20 having been the guardian for half a dozen pupils.                  21 I mean, we are talking about tens of -- dozens of pupils                  22 that we would have been guardian for. Is that right?                  23 MS POOLE: It is. We did identify after this -- well, in                  24 our 2019 report, we did identify it and raised it as an                  25 issue, but we hadn't previously.</p> <p style="text-align: center;">Page 142</p>
<p>1 MS SCOLDING: At the moment, Wales, like England, there is                  2 no licensing or registration system for educational                  3 guardians. So either the school does it or you can have                  4 independent people who take on that role. But, as                  5 I understand, there's no registration or licensing.                  6 Dr Jones, do you think that something that's come                  7 out of this case is the need for greater regulation and                  8 scrutiny of what goes on in respect of guardianship?                  9 DR JONES: Yes. I think Mr Heaney confirmed this morning                  10 that it is something that he would look at. So, yes,                  11 just to confirm and follow up what he said.                  12 MS SCOLDING: Mr Rowlands, is there anything in the                  13 Independent School Standards about the need to look at                  14 guardianship arrangements that a school might make as                  15 opposed to independent guardianship arrangements?                  16 MR ROWLANDS: I believe not. Not in terms of what we cover                  17 in Estyn, no. I think it's something CIW does.                  18 MS SCOLDING: In fact, I think it is standard 22, Ms Poole.                  19 Danny, can we just get it up briefly, page_036 of                  20 CIW000005:                  21 "Boarders' welfare is protected in any                  22 appointment ...                  23 "Any guardians ... should be subject to the same                  24 recruitment checks as staff ...                  25 "The school makes it clear ...</p> <p style="text-align: center;">Page 143</p>	<p>1 "Any guardians ... are subject to ... [relevant] CRB                  2 checks ...                  3 "... regularly monitors the suitability ..."                  4 Ms Poole, this is largely a question for you. Was                  5 the arrangement in respect of Mr Belfield adequate or                  6 appropriate in all the circumstances?                  7 MS POOLE: No.                  8 MS SCOLDING: In fact, I think you may have known about this                  9 in 2018. Can we go, please, to INQ004966_003. I think                  10 that's behind tab B2 of your bundle. This is the 2018                  11 inspection. It says there:                  12 "The principal, Toby Belfield, acts as legal                  13 guardian for all overseas pupils during their time at                  14 Ruthin School. The vice principal is the head of                  15 boarding."                  16 Now, if that wasn't appropriate when you saw it in                  17 2019, and we have just looked at it now, why was no                  18 comment made about that during the course of the 2018                  19 report, Ms Poole? Do you know?                  20 MS POOLE: Sorry, I thought you meant -- the issue that we                  21 found, and we took advice on this, was him acting for                  22 non-overseas pupils as the guardian, not the overseas                  23 pupils. So that was the issue that we were focusing                  24 down on, where he was trying to assume parental                  25 responsibility for pupils who were not overseas.</p> <p style="text-align: center;">Page 144</p>

<p>1 MS SCOLDING: Let's leave aside -- even if he puts himself                  2 forward as the legal guardian for all overseas pupils,                  3 is that an acceptable arrangement, for the principal to                  4 be the educational guardian for all these pupils who                  5 come from overseas? Is it appropriate that he has that                  6 level of control over them? So he's the head and he's                  7 responsible for all aspects of their care and welfare?                  8 MS POOLE: The answer has to be no. With hindsight, we                  9 would absolutely say, no, that's not appropriate. But                  10 that was the situation at that time.                  11 MS SCOLDING: Professor Holland, do you have any views about                  12 this issue to do with educational guardianship?                  13 PROF HOLLAND: Yes, and, again, I think this case has                  14 highlighted issues that, as an office, hadn't been                  15 highlighted to us before. We hadn't had any casework or                  16 engagement with legal guardianships. It wasn't an issue                  17 we were particularly aware of before.                  18 When I read the independent investigation report and                  19 it said as an established fact that the headteacher                  20 was -- had legal parental responsibility for pupils --                  21 boarding pupils in the school, I was, of course,                  22 absolutely baffled by that because that's not a legal                  23 possibility for him to take on.                  24 MS SCOLDING: Not without an order from the court, anyway.                  25 PROF HOLLAND: Absolutely. You can't just assume it.</p> <p style="text-align: center;">Page 145</p>	<p>1 The key issue here, of course, is a guardian                  2 provides someone separate from the school who can look                  3 after their welfare, and who they can talk to, who they                  4 may even go and stay with, you know, in a situation like                  5 a pandemic, when they can't return home.                  6 Therefore, you know, we would -- we really need them                  7 to have enough checks and balances to make sure that                  8 children are safe in the care of others as we do in                  9 other situations. So we would be in favour of greater                  10 regulation of guardians.                  11 I'm aware the school now, which, you know, the                  12 school as a whole has introduced all sorts of changes                  13 since the change of principal, and one of which is they                  14 have appointed a much more established guardian service,                  15 which is part of an association -- I'm just reading now,                  16 the association for the education and guardianship of                  17 international students, which at least carries out its                  18 own checks.                  19 MS SCOLDING: Yes.                  20 PROF HOLLAND: That's, of course, a voluntary check and it                  21 is voluntary for a school to use a guardian service that                  22 is part of that association, but it is certainly a much                  23 higher bar of safeguard than what was in place before.                  24 But there is nothing to require a school to use                  25 a service like that and there is nothing -- and there</p> <p style="text-align: center;">Page 146</p>
<p>1 are no clear regulations on this, and it does feel like                  2 a gap.                  3 MS SCOLDING: Dr Jones, I think, has already commented upon                  4 this.                  5 There were two other issues I wanted to look at,                  6 Ms Poole, which may well be something that you may or                  7 may not have been able to find out in previous                  8 inspections. The first of them was the relationship                  9 between the school and the Child and Adolescent Mental                  10 Health Service and the head's approach to children                  11 receiving mental health support and treatment.                  12 I understand that there was a cool relationship, shall                  13 we say, and a somewhat sort of -- an approach which was,                  14 shall we say, sceptical about the approach.                  15 Is that something that you could have discovered in                  16 any of your inspections, Ms Poole, particularly given                  17 the fact that you stressed to us this morning about                  18 listening to children, hearing the voice of children.                  19 MS POOLE: We did, and we do, and in 2018 and 2019 we did                  20 speak to a significant number of young people who didn't                  21 raise the issue with us, and that's the difficulty,                  22 isn't it? If that is not raised, whilst we look at                  23 children's welfare plans, if it's not raised in there,                  24 and it's not going to be, you know, it is not going to                  25 be said that the head -- it is -- if somebody doesn't</p> <p style="text-align: center;">Page 147</p>	<p>1 write down that the principal --                  2 MS SCOLDING: (Overspeaking) referral to CAMHS                  3 (overspeaking).                  4 MS POOLE: Unless that's recorded, then that is very                  5 difficult for us to know, but CAMHS can, at any time,                  6 raise concerns with us, and we would then use that to                  7 trigger whether we needed to have an inspection or not.                  8 MS SCOLDING: Do you not think that this maybe shows that                  9 CAMHS should have -- I mean, given the fact that CAMHS                  10 would have known that pupils were either stopping                  11 treatment, weren't coming for treatment or there's                  12 likely to have been some discussions, do you think that                  13 CAMHS should have informed someone, whether it's the                  14 local authority or yourselves or the government, which                  15 is the regulator, or Estyn, or even the Children's                  16 Commissioner, of those concerns?                  17 MS POOLE: Yes, and ultimately it was CAMHS that triggered                  18 the safeguarding referral in May. So they did do that.                  19 I suppose it's the threshold at which they raise                  20 concerns that maybe are not safeguarding but they are                  21 concerns about practice, so they may not reach the local                  22 authority safeguarding threshold, but we do always ask                  23 professionals to raise issues with us, because we can                  24 just log those and they help us to build a picture and                  25 inform our inspection planning. That is something we</p> <p style="text-align: center;">Page 148</p>

1 are always working on, about how we get feedback,  
 2 particularly with large health boards.  
 3 MS SCOLDING: The particular concern in this case is  
 4 a number of the pupils we are talking about are sixth  
 5 formers and, therefore, whilst they are children under  
 6 the purposes of the Children Act, obviously for the  
 7 purposes of receiving treatment, whether it's medical  
 8 treatment of any kind, the relevant test would be  
 9 Gillick or Fraser competence. Therefore, the majority  
 10 of these children, given that they're at a very  
 11 high-achieving, academically -- a school which values  
 12 academic excellence, they would have been able to make  
 13 their own decisions about clinical treatment without  
 14 reference to their legal guardian, certainly when they  
 15 were in the sixth form, if not, actually, from the age  
 16 of 14 or 15 from some aspects. Professor Holland, I see  
 17 you nodding your head. Is there anything you'd like to  
 18 contribute as far as that's concerned?  
 19 PROF HOLLAND: Absolutely. That was part of my concern,  
 20 really, that, again, going back to that independent  
 21 investigation, you know, they noted that -- the head  
 22 claimed that the parents of the young person had  
 23 supported him stopping the young person from accessing  
 24 their medication, and yet, you know, it was clear to me  
 25 that this was a competent young person who would be able

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1 young people because their academic attainment and their  
 2 move on to university was predicated on him giving  
 3 a reference -- that was what they thought it was  
 4 predicated on -- and wouldn't speak out. That is  
 5 a limitation of inspection, that if we don't see that,  
 6 if nobody tells us about it -- and there are so many  
 7 policies and procedures in a school, if we don't pick up  
 8 that specific issue in that specific policy and follow  
 9 that as a line of enquiry, we won't know, and the  
 10 difference in the 2019 inspection, in terms of people  
 11 coming forward and speaking to us, was marked to the  
 12 2018 inspection, where teachers and children felt much  
 13 freer and more empowered to talk to us, so -- yes,  
 14 hugely different.  
 15 MS SCOLDING: We then have a situation where there's been  
 16 the independent report, which did identify that there  
 17 needed to be disciplinary action taken against the then  
 18 principal, but didn't indicate there was any risk of  
 19 harm. All of you, obviously, were concerned about this,  
 20 as you have all indicated to myself.  
 21 Dr Jones, as I understand it, you sent  
 22 Mr Rowlands' -- well, you sent not them personally, you  
 23 sent Care Inspectorate Wales and Estyn back in.  
 24 Mr Rowlands, can we go to your Ofsted report  
 25 of November 2019 behind tab B4. Again, I don't think

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1 to legally make her own decisions about accessing  
 2 medication. So that was yet another concern I had about  
 3 the analysis in that report and the conclusions that  
 4 they reached. And, on accessing CAMHS in general, yes,  
 5 of course that should be the same as accessing any other  
 6 medical support or health support. It shouldn't be  
 7 treated in any different way by a school. You know, the  
 8 acts that were taken severely stigmatised mental health  
 9 conditions in the school, which I see as a real  
 10 safeguarding risk when it may come to self-harm or even  
 11 suicidal ideation.  
 12 MS SCOLDING: The other issue that I wanted to raise,  
 13 Ms Poole, whether or not it would have been possible to  
 14 find out, is about the social media policy, whereby the  
 15 head would communicate with students to discuss academic  
 16 and other matters because he viewed it as his role in  
 17 the guardian to do that. Why weren't you able to find  
 18 out about that in 2018 or at any other time? It appears  
 19 to have been, from the independent investigation we have  
 20 seen, quite common knowledge with senior staff that this  
 21 was what was happening.  
 22 MS POOLE: Because it wasn't raised with us. I think what  
 23 this does is speaks to the control that the head had  
 24 that people would not speak up against him: teachers  
 25 because they were afraid of their position; children and

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1 this was published, or am I wrong about that?  
 2 MR ROWLANDS: It was published.  
 3 MS SCOLDING: Thank you. Can we go, Danny, to  
 4 INQ004968\_003-004. There is a number of strengths:  
 5 staff know the pupils well; pastoral arrangements;  
 6 strong sense of community; safeguarding policy is  
 7 appropriate; covers the key issue; the role of  
 8 the designated safeguarding person; staff handbook.  
 9 Then it says:  
 10 "Areas for development."  
 11 If I can maybe summarise them, which are: the  
 12 council of management wasn't well versed about issues  
 13 regarding safeguarding; reports to the council of  
 14 management in respect of safeguarding were not fit  
 15 for -- were not, in effect, fit for purpose; and the  
 16 safeguarding reports didn't necessarily cover things  
 17 such as medical treatment policy and pupil behaviour.  
 18 There was no evidence of any robust review by the  
 19 council of management in safeguarding reports. There  
 20 was no adequate safeguarding culture. The principal was  
 21 exempt from guidance and there was a lack of clarity  
 22 between the designated safeguarding person and the  
 23 designated safeguarding lead. The style of leadership  
 24 was what you said may be called autocratic and there was  
 25 inadequate supervision in respect of nurses and

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<p>1 medication.</p> <p>2 We then see at page_005 the recommendations. Can</p> <p>3 I just ask, first, why were those recommendations not</p> <p>4 obvious in the reports that you'd made in 2018,</p> <p>5 particularly around the council of management and its</p> <p>6 role in the oversight of safeguarding?</p> <p>7 MR ROWLANDS: Well, because the procedures and policies we'd</p> <p>8 identified, you know, the improvements from the previous</p> <p>9 focused visit, had meant that policies, suitable</p> <p>10 policies, and procedures were put in place, and it</p> <p>11 seemed, at that point, that they were being implemented</p> <p>12 and monitored appropriately.</p> <p>13 What had changed in the meantime, between this</p> <p>14 inspection and the core inspection, was that staff were</p> <p>15 willing to sort of spill the beans, but also that it was</p> <p>16 quite clear to us that when an incident -- a major</p> <p>17 shortcoming of safeguarding had occurred, which is the</p> <p>18 behaviour of the head, that the policies weren't being</p> <p>19 implemented or applied properly.</p> <p>20 MS SCOLDING: I understand in respect of staff spilling the</p> <p>21 beans, but what I don't understand is the issues to do</p> <p>22 with the reporting safeguarding concerns to senior</p> <p>23 leaders and that not being appropriately robust.</p> <p>24 Because I'm assuming that's something that would have</p> <p>25 been looked at by yourself in the previous inspection.</p> <p style="text-align: center;">Page 153</p>	<p>1 Was it simply that people told you a different story?</p> <p>2 Because I'm assuming things like reports on the position</p> <p>3 of sanctions, physical restraint, you could have -- or</p> <p>4 your inspectors could just have looked at the</p> <p>5 documentation to see whether or not that was being done.</p> <p>6 So what had changed? Was it a different sort of</p> <p>7 inspection? Were you looking at different documents?</p> <p>8 It would be useful to know.</p> <p>9 MR ROWLANDS: It was a different kind of inspection, a far</p> <p>10 more detailed inspection. As we explained this morning,</p> <p>11 during an ordinary core inspection, a full inspection of</p> <p>12 the school, we would be spending the equivalent of about</p> <p>13 one HMI day looking at safeguarding, but this focused</p> <p>14 inspection was entirely focused on safeguarding, so you</p> <p>15 had two inspectors there for about three days.</p> <p>16 MS SCOLDING: Okay.</p> <p>17 MR ROWLANDS: So the detail was far more detailed. But</p> <p>18 I think what I previously said is the case. As we say</p> <p>19 in this report, many of the procedures were still fine,</p> <p>20 but people weren't actually implementing, applying, them</p> <p>21 or evaluating their effectiveness.</p> <p>22 MS SCOLDING: Okay.</p> <p>23 MR ROWLANDS: The proof of that was the particular</p> <p>24 behaviours of the head that we knew about. And we</p> <p>25 didn't have that proof in the previous inspection.</p> <p style="text-align: center;">Page 154</p>
<p>1 MS SCOLDING: Mr Rowlands, given that there are relatively</p> <p>2 few boarding schools in Wales, whether run by the state</p> <p>3 or run independently, do you think that the relatively</p> <p>4 concentrated nature of them meant that it would be</p> <p>5 possible for you to inspect them more frequently and to</p> <p>6 do the sort of, what some people might call the kind of</p> <p>7 drains-up exercise you obviously did here, and do you</p> <p>8 think that would be appropriate, given the vulnerability</p> <p>9 of those pupils who are living away from home, a number</p> <p>10 of whom have come from all around the world and have</p> <p>11 their own unique vulnerabilities? Mr Rowlands, any</p> <p>12 views on that?</p> <p>13 MR ROWLANDS: Absolutely, I would agree with that. We said</p> <p>14 something similar this morning. You know, if resources</p> <p>15 allow, how would we spend, if you like, extra resource,</p> <p>16 if we had more time? Well, the various options would be</p> <p>17 to inspect more frequently or put more team members onto</p> <p>18 an inspection, or do something more targeted.</p> <p>19 Now, currently, Welsh Government in their annual</p> <p>20 remit letter ask us to do annual monitoring of</p> <p>21 independent special schools because the children are</p> <p>22 particularly vulnerable, so I think you're right, we</p> <p>23 could identify this group of schools, group of children,</p> <p>24 as being particularly vulnerable and treat them in</p> <p>25 a similar sort of way.</p> <p style="text-align: center;">Page 155</p>	<p>1 The other option is, similar to what we do do</p> <p>2 currently, if there is any question, that Welsh</p> <p>3 Government ask us to go to in in a focused visit.</p> <p>4 MS SCOLDING: Dr Jones, I'm assuming you're listening to the</p> <p>5 answer to that question.</p> <p>6 DR JONES: Yes.</p> <p>7 MS SCOLDING: Good.</p> <p>8 DR JONES: I think just one other issue I'd like to raise is</p> <p>9 we could also consider a risk-based approach to</p> <p>10 investigations, and that's something that we might want</p> <p>11 to consider as part of a lessons learnt from this</p> <p>12 exercise.</p> <p>13 MS SCOLDING: Ms Poole, not only Estyn went in, but your</p> <p>14 team also went in, and you completed another inspection</p> <p>15 report that we have behind tab B3. Danny, do you mind</p> <p>16 getting up INQ004967_004 of _013, please. These are</p> <p>17 your findings. I think this summarises -- Ms Poole, am</p> <p>18 I right in thinking that this summarises the concerns</p> <p>19 that you had, or the good and the less good things that</p> <p>20 you found?</p> <p>21 Had the school moved on at all since your inspection</p> <p>22 of 2018, from your perspective?</p> <p>23 MS POOLE: It had moved on in some things, so the report</p> <p>24 does identify a small number of areas in which they'd</p> <p>25 improved from our last inspection. So it wasn't all</p> <p style="text-align: center;">Page 156</p>

<p>1 bad. And, again, we were talking to boarders who were 2 very happy at Ruthin School. But there were areas for 3 improvement. 4 What this inspection report reflects is the change 5 that we made in terms of our inspection report once the 6 2016 Act came in as well. So a greater focus on 7 well-being and outcomes for children, and whilst the NMS 8 aren't about that, we overlay our work -- our inspection 9 over independent schools with that frame of reference 10 and with that lens anyway, so that rights-based approach 11 that runs through Social Services and Well-being Act and 12 RISCA, we apply regardless of what the NMS and 13 regulations say when we are inspecting independent 14 schools now. So that's what's reflected here and 15 reflects that sort of change in focus for us as well. 16 MS SCOLDING: Can I say, in 2018, you went in and there was 17 that shopping list of concerns, as I said earlier. 18 MS POOLE: Yes. 19 MS SCOLDING: Do you think that the 2018 report really got 20 under the skin of what was going on at the school 21 and/or, with hindsight, were there issues that could 22 and/or should have been picked up in 2018 that weren't? 23 MS POOLE: There were issues that weren't picked up, because 24 our focus, when we went in, in 2018, was that the issue 25 then was about the behaviour of a teacher outside of</p> <p style="text-align: center;">Page 157</p>	<p>1 school and how the headteacher had responded to that. 2 So that was our frame of reference then, and we weren't 3 aware at that point of this concern. I mean, back in 4 2011 we were, but this is now eight years/nine years -- 5 eight years later. So we weren't, in 2018, looking at 6 that because that wasn't a concern that was raised with 7 us. 8 I echo what Mr Rowlands said, really, that where we 9 have got concerns and we have -- we can then focus our 10 inspection around those concerns and it gives the 11 inspection -- it is much more in-depth around a narrower 12 area, whereas a scheduled inspection is a broad look 13 across everything. 14 MS SCOLDING: Therefore, what comes out of that may well be 15 that, firstly, you shouldn't rely on an inspection 16 necessarily finding all the concerns there might be with 17 child protection in the context of a school; and, 18 secondly, that it's much easier to find things once you 19 already know that there are problems. 20 MS POOLE: Yes. Inspection is one part of a whole system 21 about keeping children safe. But it isn't the only 22 thing that can give assurance. And inspection by its 23 nature is episodic and can never guarantee children's 24 safety. 25 MS SCOLDING: Thank you. Dr Jones, turning to you, we have</p> <p style="text-align: center;">Page 158</p>
<p>1 quite a lot of evidence and information about the fact 2 that the Welsh Government became quite heavily involved 3 with the school at that time. Danny, would you mind 4 getting up WGT000473_004-005. It is paragraph 28. In 5 fact, it goes on -- there is one further point on 6 another page, but we can't get up more than two pages at 7 a time. 8 Dr Jones, I think we can see from September 2019 9 onwards, when there was a request made to share the 10 redacted investigation report, we have got, somebody -- 11 was it yourself who went up to visit -- received an 12 update from Denbighshire, and then, in fact, I think the 13 director, education directorate and deputy director 14 Social Services travelled to meet with the chair of 15 management to explain the gravity of the situation. You 16 then issued an action plan. In January 2020, there were 17 issues about publication. Then, in February 2020, you 18 said that their action plan wasn't sufficiently robust. 19 Then, in February 2020, the chair of management 20 committee determined that the headteacher should be 21 dismissed. Then there was a further meeting 22 in February 2020 identifying a level of challenge for 23 the chair and the council of management. 24 Can you tell us roughly what you were doing during 25 this period in time and the nature of your meetings</p> <p style="text-align: center;">Page 159</p>	<p>1 between yourself and the council of management as it was 2 then composed? 3 DR JONES: From September to February? 4 MS SCOLDING: Yes, just broadly what was going on. 5 DR JONES: Previously, we were being kept in touch with the 6 investigations, both the independent investigation and 7 the investigations taken by Denbighshire. Once they 8 concluded, we then took advice and discussed a report -- 9 a visit by Estyn and CIW. I think what was becoming 10 clear to us is our concerns were escalating, so we were 11 aware, for example, after the report and 12 between November and December the board weren't actually 13 receiving all the papers and they hadn't received the 14 full report, for example, of the independent 15 investigation, so they may not have been aware of 16 the gravity of the situation. 17 So from our perspective as well as actually asking 18 for an action plan, we escalated the position, escalated 19 the situation by going to visit them. I think it was 20 important that we had a face-to-face meeting with both 21 the board and the chair to make sure that they 22 understood that we were seriously considering using the 23 full range of our powers, including the deregistration, 24 and those meetings were basically their opportunity to 25 hear from us exactly how seriously we were taking the</p> <p style="text-align: center;">Page 160</p>



<p>1 situation.</p> <p>2 MS SCOLDING: As I understand it, the chair of management</p> <p>3 stood down and I will adduce later a witness statement</p> <p>4 from the new chair of management which talks about the</p> <p>5 changes. What oversight have you had of the school</p> <p>6 since February 2020, which is obviously just before the</p> <p>7 pandemic?</p> <p>8 DR JONES: We have been in constant contact with them</p> <p>9 providing some advice (inaudible) and also getting</p> <p>10 feedback from the new chair. We would have been out to</p> <p>11 visit them more often, had it not been for COVID,</p> <p>12 unfortunately. We had a revised action plan on Friday</p> <p>13 last week. It's 177 pages long, so we are working</p> <p>14 through that now and we are planning to visit them</p> <p>15 in January, once the new year -- actually, it was the</p> <p>16 earliest time we could get in. So constant contact,</p> <p>17 providing some advice, guidance and support, and then</p> <p>18 following --</p> <p>19 MS SCOLDING: What do you feel the direction of travel is</p> <p>20 for the school, now that you have seen -- I think there</p> <p>21 have been several action plans produced and you've been</p> <p>22 in dialogue. What's your view about what's going on</p> <p>23 currently?</p> <p>24 DR JONES: I think the school have made a number of</p> <p>25 significant improvements. I, personally, would like to</p> <p style="text-align: center;">Page 161</p>	<p>1 see the focused -- visits from the two inspectorates to</p> <p>2 confirm they are content with the direction of travel.</p> <p>3 They seem to be taking a lot more independent advice and</p> <p>4 the Children's Commissioner mentioned earlier they have</p> <p>5 started taking independent governance and other reports</p> <p>6 on board. So I think the fact that they have replaced</p> <p>7 large parts of their board and trustees and their senior</p> <p>8 management was sensible and I would suggest that they</p> <p>9 are moving in the right direction.</p> <p>10 MS SCOLDING: Ms Poole and Mr Rowlands, neither of your</p> <p>11 organisations have been in because obviously inspections</p> <p>12 were suspended shortly after the action plan was deemed</p> <p>13 not to be appropriate. Have you had any contact from</p> <p>14 either Denbighshire or from the school themselves to</p> <p>15 keep you up to date about what's been going on.</p> <p>16 Ms Poole first and then maybe Mr Rowlands?</p> <p>17 MS POOLE: We have been liaising with Welsh Government who</p> <p>18 have been sharing the up-to-date action plans and we</p> <p>19 have seen the correspondence that's been coming in.</p> <p>20 I think we would concur with Dr Jones that it's going in</p> <p>21 the right -- it appears to be going in the right</p> <p>22 direction. Until we reinspect, we won't know.</p> <p>23 If we had concerns, then we would go back and</p> <p>24 reinspect sooner, but at the moment we are prioritising</p> <p>25 inspections generally where we have concerns, so we are</p> <p style="text-align: center;">Page 162</p>
<p>1 still inspecting but we are going -- following up</p> <p>2 concerns at the moment. So it isn't -- that isn't on</p> <p>3 our priority list at the moment.</p> <p>4 MS SCOLDING: Mr Rowlands?</p> <p>5 MR ROWLANDS: Yes. I believe we have done one visit and we</p> <p>6 have looked at some of the paperwork as well. I can</p> <p>7 confirm the sort of details with you later on, but</p> <p>8 I believe we have done those things and, like</p> <p>9 colleagues, we think they are going in the right</p> <p>10 direction.</p> <p>11 Our experience of these sorts of situations is, if</p> <p>12 you have a complete change of governance and management,</p> <p>13 that usually solves it because that's the problem in the</p> <p>14 first place.</p> <p>15 Hence why we think a leadership and management</p> <p>16 standard is so important.</p> <p>17 MS SCOLDING: Thank you, Mr Rowlands. Professor Holland,</p> <p>18 have you been in touch since February 2020? What's your</p> <p>19 understanding and what work have you been doing?</p> <p>20 PROF HOLLAND: Yes, we have stayed closely in touch with the</p> <p>21 school. I would really concur with what everyone else</p> <p>22 is saying. Both the new principal, who was interim and</p> <p>23 now is confirmed as permanent post, and the new head --</p> <p>24 chair of the management committee have stayed actively</p> <p>25 in touch and very proactively wanted to update myself</p> <p style="text-align: center;">Page 163</p>	<p>1 about changes that they have made. So we have received</p> <p>2 several iterations and updates on their action plan on</p> <p>3 safeguarding, the most recent of which was received this</p> <p>4 week showing progress, a very, very detailed plan. It</p> <p>5 is a huge improvement on the one that we saw just under</p> <p>6 a year ago under the previous management, which was very</p> <p>7 poor and sparse, with very little detail. So we have</p> <p>8 seen -- we have seen a change of culture, although</p> <p>9 I would also concur with Dr Jones that, until there's</p> <p>10 been an actual inspection, the whole issue that we have</p> <p>11 been discussing this afternoon is about having things on</p> <p>12 paper is not the same as always following things</p> <p>13 through.</p> <p>14 My office, two of my staff have visited the school</p> <p>15 in the very brief period when it seemed safe to do that</p> <p>16 kind of thing. There were no children present. It was</p> <p>17 for a staff training day, at the very beginning</p> <p>18 of September. We had proactively offered this and the</p> <p>19 school took it up and they carried out children's rights</p> <p>20 training with the entire staff team and council of</p> <p>21 management.</p> <p>22 I think that was -- that's a really important step</p> <p>23 for the school because our experience with a range of</p> <p>24 institutions, including schools, is that having a deep</p> <p>25 understanding of children's human rights really brings</p> <p style="text-align: center;">Page 164</p>

<p>1 safeguarding procedures, et cetera, to life as to why                  2 they're important, but also using children's rights,                  3 language and approach -- you know, lots more                  4 participation of young people and active listening of                  5 them, as one example, really helps relationships.                  6 I think what we have seen in these earlier stages of                  7 the inspections of this school is that the nature of                  8 the relationships, the lack of trust in the head in                  9 particular and the lack of feeling of security by staff                  10 and pupils, the distrust of the safety of speaking out,                  11 meant that they could have had on paper correct                  12 policies, although we have heard they didn't at first,                  13 but even when they did, you know, that doesn't work                  14 without relationships where people feel confident to                  15 speak out.                  16 So we felt it was an important step for them to                  17 undertake children's rights training, though, again, you                  18 know, we would like to see then that ethos put into                  19 practice.                  20 But we have certainly seen a real change in tone                  21 from the school and a real change in their actual                  22 documents and they have brought in some really                  23 experienced experts on child protection externally to                  24 advise and to work through all their procedures, but,                  25 really, the governance is -- and the leadership,</p> <p style="text-align: center;">Page 165</p>	<p>1 I completely agree with Mr Rowlands, is so important                  2 here as well. So there is the relationship side and                  3 then there's the quality of the governance and                  4 leadership. Unfortunately, in this school, we seem to                  5 have had coming together both -- you know, the                  6 controlling behaviour of the headteacher and disregard                  7 for safeguarding practices plus a council of management                  8 that was not in a position -- didn't have the procedures                  9 or the practice to challenge that.                  10 So we had neither of those in the school, and that's                  11 where things seem to have really fallen through.                  12 MS SCOLDING: Mr Rowlands, I see your hand up.                  13 MR ROWLANDS: Can I just correct what I said earlier? We                  14 have undertaken a visit to a small number of schools but                  15 Ruthin wasn't one of them. What we have done is, it was                  16 an engagement phone call, which is an extensive phone                  17 call, not an engagement visit. So I want to correct                  18 that.                  19 One thing I would like to say, one thing we have                  20 learnt from this process, is, we will be able to train                  21 our inspectors now with a real example, and I think if                  22 we'd have had this as an example prior to the actual                  23 activities in Ruthin, nobody would have believed us what                  24 was going on, in terms of how controlling the                  25 headteacher was and how he maintained this grip on the</p> <p style="text-align: center;">Page 166</p>
<p>1 staff, and we have mentioned some of those things in our                  2 evidence, because we didn't understand why all this was                  3 coming out after our core inspection.                  4 Now, some of the things were getting the staff to                  5 sign non-disclosure agreements.                  6 MS SCOLDING: So the staff had to sign non-disclosure                  7 agreements, that they would not talk in a disparaging                  8 way about the school or anybody associated with it?                  9 MR ROWLANDS: Yes. And difficulties were put in staff using                  10 and getting in touch with unions, so I understand, so                  11 that was another route of support for staff that was                  12 made difficult.                  13 People were telling us they didn't want to come and                  14 tell us anything during previous inspections because                  15 cameras were strategically placed around the school and                  16 the head was reviewing the tapes and monitoring emails                  17 as well. So there was a whole range of ways in which it                  18 was difficult for both learners and staff to actually                  19 communicate with the inspection team.                  20 And that's been a real learning point for us, the                  21 way that the power was concentrated in one person is                  22 something that we are much more alert to going forward.                  23 MS SCOLDING: Thank you, Mr Rowlands, that's very helpful.                  24 Ms Poole, do you have anything else you would like to                  25 add?</p> <p style="text-align: center;">Page 167</p>	<p>1 MS POOLE: No. I mean, I would echo that exactly, and                  2 I think, you know, I read your literature review and the                  3 characteristics which are around the sort of                  4 male-dominated, controlling culture are absolutely what                  5 we saw in Ruthin and it is a perfect -- maybe that's not                  6 the right word, but it is a very good example for us to                  7 use when training our staff, not only in terms of                  8 boarding schools, but generally when we are thinking                  9 about inspecting around culture.                  10 MS SCOLDING: I have no further questions for any of you.                  11 Professor Jay and the panel may have questions for you.                  12 I wanted to thank you all very much for coming today.                  13 Professor Jay.                  14 THE CHAIR: Thank you, Ms Scolding.                  15 Questions from THE PANEL                  16 THE CHAIR: I may have overlooked this, but I would be                  17 obliged if someone would confirm whether the former                  18 principal is still permitted to operate as a teacher?                  19 MS SCOLDING: Dr Jones, maybe you could help us. In fact,                  20 I think I know the answer to the question, but I don't                  21 want to give evidence.                  22 DR JONES: I believe that he is, but I am not 100 per cent                  23 sure.                  24 MS SCOLDING: Professor Holland has her hand up.                  25 PROF HOLLAND: This has been an ongoing concern for us as an</p> <p style="text-align: center;">Page 168</p>

1 office, because this headteacher, Mr Belfield, after  
 2 being dismissed from the school, went on to set up an  
 3 online school, which we were concerned about and  
 4 contacted various authorities about. By this point, he  
 5 was residing in England -- well, he was always  
 6 residing -- his home address I think was always in  
 7 England, but the school was registered in England, so  
 8 I liaised with the English Children's Commissioner to  
 9 raise our concerns with the UK Government about how  
 10 unregulated, indeed, online schools were, because he was  
 11 able to do that, obviously, as a non-qualified teacher,  
 12 and there were no regulations about it being inspected,  
 13 et cetera.

14 As someone who has not got qualified teacher status,  
 15 he cannot be struck off from a teaching register, which  
 16 is a real issue. If we changed the legislation in  
 17 Wales, he could have been registered, because we have  
 18 non-qualified teachers registered with our Education  
 19 Workforce Council, and in which case he would have  
 20 appeared, I suspect -- obviously I wouldn't want to  
 21 pre-empt a hearing by that council, but I would suspect  
 22 he would have been barred or struck off from that  
 23 register, which would have appeared on a record for any  
 24 employment going forward.

25 But at the moment, if someone is dismissed from an

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1 independent school, they can go on and seek employment  
 2 elsewhere because they have got no record with the  
 3 Education Workforce Council.

4 THE CHAIR: Thank you very much. That's very helpful.  
 5 I have a second question, which is about the members of  
 6 the council of management who endorsed the conclusions  
 7 of the report that was produced. Was any action taken  
 8 against them, in terms of their fitness to be charity  
 9 trustees?

10 DR JONES: I think that that would be a question for the  
 11 Charity Commission, rather than for Welsh Government.

12 THE CHAIR: Presumably only if they knew about it.

13 DR JONES: Charity Commission have run their own  
 14 investigations.

15 THE CHAIR: Thank you. What was the outcome of that?

16 DR JONES: What I do know is they have closed their case on  
 17 this. I'm not sure what conclusion they reached in the  
 18 previous one, sorry.

19 THE CHAIR: Does anyone else have any intelligence to  
 20 enlighten us on that?

21 MR ROWLANDS: Can I just add something about the first  
 22 question? I think there is, from my understanding,  
 23 a loophole about independent schools, that online  
 24 schools don't count as schools. So the standards don't  
 25 really apply to the online schools because one of

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1 the big parts of the online -- of an independent school  
 2 is the accommodation side of it.

3 I'm not sure how that applies to this particular  
 4 case of this headteacher, ex-headteacher, but that is  
 5 a loophole. There are those kinds of schools in Wales  
 6 that we can't inspect, and we had a request from the  
 7 Charity Commission for some of the papers, which we  
 8 supplied, but I don't know the outcome.

9 THE CHAIR: Thank you, Mr Rowlands.

10 PROF HOLLAND: I'm afraid I can't answer the outcome bit,  
 11 but I can assure you, chair, that the Charity Commission  
 12 have been given full information about the concerns  
 13 about the school, including concerns that were not  
 14 necessarily directly about safeguarding, but about  
 15 financial matters regarding the relationship between the  
 16 chair of the -- the former chair of the council of  
 17 management and the headteacher, which we were informed  
 18 of by a whistleblower and immediately informed the  
 19 Charity Commission, who assured us they had an open case  
 20 and were -- received information and were actively  
 21 investigating.

22 I'm afraid I don't know what their final conclusions  
 23 are, but we have made sure that they have received all  
 24 information about the school that we have in our  
 25 possession.

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1 THE CHAIR: Thank you very much. I will ask my colleagues  
 2 if they have any questions. Ms Sharpling?

3 MS SHARPLING: No, thank you, chair.

4 THE CHAIR: Mr Frank?

5 MR FRANK: No, thank you.

6 THE CHAIR: Sir Malcolm?

7 PROF SIR MALCOLM EVANS: No, thank you, chair.

8 THE CHAIR: Ms Scolding?

9 MS SCOLDING: I'm so sorry, chair. I was going to say  
 10 something, but it has completely gone out of my mind, so  
 11 I apologise.

12 THE CHAIR: It has been a long day. Thank you very much to  
 13 all of you for your evidence today. Thank you.  
 14 (The witnesses withdrew)

15 THE CHAIR: We will reconvene tomorrow. Thank you.  
 16 (4.07 pm)

17 (The hearing was adjourned to  
 18 Friday, 27 November 2020 at 10.30 am)

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