

Rowdeford School

Inspection report for residential special school

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Inspector	Wendy Anderson
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Date of last inspection	6 June 2006

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About this inspection

The purpose of this inspection is to assure children and young people, parents, the public, local authorities and government of the quality and standard of the service provided. The inspection was carried out under the Care Standards Act 2000.

This report details the main strengths and any areas for improvement identified during the inspection. The judgements included in the report are made in relation to the outcome for children set out in the Children Act 2004 and relevant National Minimum Standards for the establishment.

The inspection judgements and what they mean

Outstanding:	this aspect of the provision is of exceptionally high quality
Good:	this aspect of the provision is strong
Satisfactory:	this aspect of the provision is sound
Inadequate:	this aspect of the provision is not good enough

Service information

Brief description of the service

Rowdeford School is situated in a Grade II listed Georgian house, set in twenty acres of parkland on the outskirts of Rowde, near the town of Devizes. It is a secondary, co-educational, special school for pupils with a range of needs, whose overall abilities will enable them to benefit from the curriculum it offers. This generally includes pupils whose measured ability and attainment places them on either the moderate learning difficulties spectrum, or at the top end of the severe learning difficulties spectrum. Many pupils also have associated medical conditions and/or syndromes. The school caters for 24 boarders. Within the school is a state of the art purpose built Prospect Centre. This is a specialist centre for selected pupils with autistic spectrum disorders from years seven to eleven.

Summary

This announced took place on the 19 & 21 June 2007. One inspector was at the school for 22.5 hours. The inspector spent time speaking to boarders and staff. Several of the children showed the inspectors around the school. Inspector examined school and boarders records. The judgements contained in this report have been made from evidence gathered prior and during the inspection, which included a visit to the service and takes into account the views and experiences of the people using the service

The overall quality rating is outstanding.

This is an overview of what the inspector found during the inspection.

Improvements since the last inspection

Since the last inspection the building has been completed on the schools sports hall and the Prospect Centre. The Prospect Centre is a state of the art facility for selected pupils with autistic spectrum disorders. This centre has been built with the full involvement of the staff and the young people who will be using it. Within the centre are small classrooms, one equipped for cookery, one for IT and one for design technology. There is a sensory room and some time out room for the young people. The centre is built around a central court yard and provides separate playing areas for the young people. The sports hall provides all the usual sports facilities and a climbing wall on one of the exterior walls. There is also a dedicated speech and language room. The facilities in the sensory room and the sports hall are available to the young people who board outside of school hours. The school has developed and implemented a home school link-worker to further enhance the already strong relationships between the staff and the parents and families of young people at the school. The school has also implemented the 'Huff and Puff' exercise programme to help stimulate young people and assist with their learning. The school has employed a cook for teatimes and this has further improved the food provided for the young people

Helping children to be healthy

The provision is outstanding.

The promotion of health is taken seriously. Good use of records, planning and other management systems ensure that health care needs are met. The children remain registered with their home GP. The school doctor sees all the children at age 14 and others as requested, particularly the new intake. This can be a male or female doctor dependant on the young person's choice. Usually parents will take young people to Doctors appointments but staff will take young people

to these appointments if parents are unable to do so. The school has good links with the school nurse and other healthcare professionals; records were seen of referrals to opticians, audiologists and dieticians. The school nurse also takes part in PHSE lessons as do the Head and Deputy and Head of Care in some training in subjects such as pregnancy and HIV/AIDS. The Head of Care has recently completed SUST training, (substance use, screening and harm reduction training.) This training looks at identifying drug misuse and helping young people if unable to come off the drug to use them safely. The health and safety issues are covered and the term drugs covers alcohol and other substance abuse. At the time of inspection the Head of Care was involved in two case studies with young people at the school. They had given their consent to be involved. The school nurse is involved in the compilation of bedwetting and soiling plans for individual young people. These are detailed and a copy of this plan is kept in the sluice room. Immunisations take place for the year 10 young people. Information on young people's allergies and intolerances are recorded and this information is shared with the staff, including the kitchen staff. This information is frequently reviewed and updated. The school has introduced 'Huff and Puff' sessions. These sessions were started due to concern and a Government drive, that young people were not being active enough. Young people are involved in this by choice and staff said that most chose to do so. These sessions take place three times per week and involves various games but also encourages young people to make up their own games including the games rules. Young people were asked what kind of games they would like and most wanted ballgames and skipping games. Young people said that they like 'Huff and Puff' and like the staff joining in. The school envision that in the future this will be run by the young people themselves. Children with particular healthcare needs have detailed individual health plans and this information is made available to all staff who may need to know. These plans are signed by the school nurse, parents and the Head. Information is also passed from teaching to care staff by written notes. At the time of inspection there were young people at the school with diabetes. The school has arranged for the diabetes nurse to visit and provide information for the staff team. At the young persons annual review the school collates all the young people's medical information from that year and this forms part of the review. Medication is all stored in locked medical cupboards and the administration of medicines is recorded accurately. Written parental permission is gained before the administration of any prescription or non-prescription medication. Medicines are recorded when brought into school. Sufficient staff are trained in first aid and first aid boxes are available in many locations around the school. The school has no sick bay, but if children are ill in their beds they told inspector they are easily able to summon assistance from the care staff. The school promotes healthy eating by providing young people with a nutritional and well balanced diet. The current menu is on a five-week rolling programme and each lunch time a vegetarian option, salad and one other course is offered. Desserts include fresh fruit and yoghurt. The school takes photos of meals for the young people in the Prospect Centre so that when they are given the menu they can relate the meal to the photo. The school has employed a new tea cook and this has led to the tea menu being developed. The school achieved the Healthy Schools Award in July 2005 and was selected as a regional finalist for Healthy School in the National Teaching Awards. If a young person has food intolerances, allergies or specific dietary requirements, this information is reported to the cook. The school has also introduced a healthy snack time for young people in year eight and year seven in the Prospect Centre. They are looking at rolling this out to the entire school. Those in residential units are provided with appropriate supplies of food that can be replenished from a central stock. Breakfasts are taken in the residential units and are a relaxed start to the day. A small but separate dining room (with room for approximately 12 children) is available for those who dislike the bustle of the main dining room. The main dining room now has two sittings. The

Head and Head of Care said that this has made meal times a more social and relaxed occasion. The school sources its food locally where possible and continues to grow some of its own vegetables although this is not enough to make them self sufficient. Young people said that the food at the school was 'really good'. They said that there was 'always a good choice and they always had enough to eat'. They said that if they 'did not like what was on the menu staff and/or the cook would get them something else to eat'. Young people said that since they had got a tea cook 'teas were much better'. They felt that healthy eating was important and felt involved in the schools commitment to this programme.

Protecting children from harm or neglect and helping them stay safe

The provision is outstanding.

Interaction between staff and young people was observed and staff treat young people with respect and care. Staff spoken to were very aware and sensitive that personal care for the children was also managed with care, respect and consideration. The staffing levels, which allows two staff per residential unit permits additional time to be given to personal assistance. Young people's records are stored securely and staff respect young people's rights to confidentiality within the bounds of safety. The school has clear policies and procedures on staff working with young people of the opposite sex and staff are well aware of these. The young people said that staff treated them 'really well and always knock before entering their bedrooms'. They also said that their bathrooms and showers were private. The young people spoken to were clear about whom they should speak to if they had concerns or wished to make a complaint, which included care staff and the two independent listeners. The independent listeners frequently visit the school and spend time in the units so that young people get to know them and would thus be more likely to contact them if they needed too. Young people said that they felt staff took time to listen to them and took what they said seriously. The school has a robust complaint policy and procedure in which all staff are trained. The school has a comprehensive child protection policy and procedure in which all staff are trained including frequent refresher training. Training on child protection issues continues to be seen as high importance by the school. Care staff report receiving regular refresher child protection training. Teachers as well as ancillary staff also report being included in child protection training. The independent listeners said they had received child protection training but not within the last 12 months. The Head of Care reported an improvement in information sharing between the Departments of Children, Families and Education in general and after a child protection investigation had taken place involving a young person from the school. They felt that this was in part due to the involvement of the Head of Safer Care of the Local Authority. Since the last inspection there have been ten child protection referrals, three of which become full child protection investigations. The school handled these referrals professionally and followed their robust policies. As a result of some of these referrals the school has carried out extensive risk assessments. Both staff and young people report that all forms of bullying are unacceptable and are clear about actions they would take in the event of any incident. Where there had been incidents a risk assessment had been done and in extreme circumstances young people may be expelled. Information on the school anti bullying policy, and all other relevant information, is evident on the notice boards throughout the school in a pictorial form (Wigdet). The school clearly feels that a high standard of behaviour is important. The behaviour expected by the school is explained to the young person at the time of their admission, and the use of a reward system by which points can secure an end of term prize is seen as encouraging and rewarding positive behaviour. The school does have a sanction log which records the appropriate information. The school has a clear policy and procedure on young people being absent without

authority. This is not a major issue within the school but all staff are regularly reminded of the procedure so that in the event of it being needed they are confident with what needs to happen. The school has a policy on physical intervention and it is clear to staff that restraint should only be used by those who have received appropriate training. Staff reported that the management of disruptive behaviour passes through a series of stages, with physical restraint used only in the rarest of circumstances. This was born out by the school restraints records where any use of physical restraint is clearly documented. The children spoken to report the school's use of rules and punishments, including the use of the above reward system, to be fair. Young people particularly like the reward system and are proud of their achievements in this area. There is a minimal staff turnover amongst the care staff. The Head of Care retains a list of bank staff, negating the need for agency care staff. The 11 personnel files reviewed by the inspectors contain all the information as required. The school has implemented the DFES safer recruiting guidelines. The school involves young people in the interview process. They work with staff about what questions they wish to ask. They then have a practice interview with existing members of staff, who they choose. At the actual interview they ask their chosen questions and record the candidates response, either by words on pictorial representations. The young person panel then meets with the adult interview panel and gives their feedback. All visitors to the school must sign in and out, using the Visitors Book and are provided with a visitors pass. Where contractors come to the school these are supervised and the school tries where possible to use the same contactors so that they build up an understanding of the school and its pupils. The school has a comprehensive fire record, which evidenced that drills were taking place at the required intervals. The school uses an independent consultant to conduct a full audit of fire safety. The school has comprehensive water records which detail temperature and regular check for Legionella, of which there has been no sign. The school has detailed risk assessments on all of the areas required, including activities, building and individual risk assessment on individual children where a potential risk or concern has been identified. These are regularly reviewed and updated. The ancillary staff said that they receive information on COSSH which is frequently updated. The implementation of the above robust set of relevant policies and procedures affords good levels of protection for the children.

Helping children achieve well and enjoy what they do

The provision is outstanding.

The education and care aspects of the school work very closely to provide a holistic approach to the young person's care. Evidence was seen of the daily verbal and written handovers between the teaching and residential provision to ensure a cohesive approach with the young people and that the residential provision can contribute and participate to educational progress. Where necessary, but at least once every half term, teaching staff report that they meet with key workers to address any particular concerns regarding an individual young person. Staff interviewed said that there are strong relationships between the teaching and care staff. Care staff actively support the work of the teaching staff, listening for example in an evening to young people reading. The school offers the young people an opportunity to engage in a range of activities, from Judo, swimming and trampolining to participation in local community activities and youth clubs. At the time of inspection the staff were in the process of reengaging with the local youth clubs after a period of absence due to staff being concerned over the supervision at the youth club. Photographs on the walls of residential units provide evidence of the wide range of activities. The young people spoken to report that participation in activities and outings is voluntary. They said that they are able to put forward ideas for activities and trip and where possible staff will arrange these for them. The recent new sport hall will widen the activity

choices for the young people. Part of the sport hall is a climbing wall which the young people were instrumental in building. The young people spoken to report being able to bring videos from home, but that they had to be age appropriate as well as toys and games. Support to individual children as well as the entire school community is one of the strengths of the school. Evidence of this individual support was in the young peoples' files inspected and the young people said this was the case.

Helping children make a positive contribution

The provision is outstanding.

The school operates a School Council which has been able to contribute to school life and been able to change things. There are also house meetings held regularly. The school regularly carries out surveys to ascertain young people's, parents' and carers' views on the school. The school retains good lines of communication between itself and the parents of the young people, through continued use of a book, which passes between the school and the young person's home. The book allows parents, care staff and teachers to provide feedback to others on aspects relevant to the well being of the young people. Young people are encouraged and enabled to maintain contact with their family and friends during the week. The young people have access to pay phones sited in the residential units, although it was observed that some of these are and not particularly private allowing conversations to be overheard by those passing by. The school has done what it can within the constraints of the buildings' listing. The school has recently has a new sports hall built. The young people were involved in the planning and the development of the climbing wall on the outside of this building. This involved visiting a climbing centre then each child designing a plan for the hand and foot holds. These plans were then laid out using the appropriate hold to see how workable the plans were. Young people worked together to choose which was the best design. This design was then placed on the wall of the sports hall. The young people continue to change and adapt the climbing wall to suit the ability of those using it. The staff's relationship with young people is one of the school strengths. There is an ethos of mutual respect between the staff and the young people. Young people said that staff were 'kind, fun, took time to listen to them, approachable and were very caring'. Some of the young people have communication problems. The school has access to the services of two speech therapists. The school also has various computer programmes to facilitate communication, including a 'widget' picture system. This has been used to provide young people with important information on the school policies such as anti bullying, child protection, school routines and many more. The school's unit for autistic young people (the Prospect Centre), provides specialist support where needed. Since the last inspection the previous Prospect Centre has been replaced with a state of the art purpose built centre. The staff and the young people have been thoroughly involved in the design of this building. The school has access to the Local Education Authority Behaviour Support Team, together with its current policy of managing disruptive behaviour in the classroom this facilitates and promotes communication with the children. Staff use positive care and control with the young people. The allocation of key workers is dictated by care staff workload, the young people spoken to, indicated that they could request to change their key worker if they felt the current arrangement was not working. With the national educational policy currently promoting inclusion rather than exclusion of disruptive behaviour, there was a concern from both staff and teachers that the school was increasingly asked to support children exhibiting challenging and complex behavioural/social problems. Due to the persistence of the Head, Senior Management Team and the School Governors this situation has not happened. They recognised the evolving nature of the school but also recognise the fragility of a significant number of the young people placed at Rowdeford,

where they are provided with a safe environment with consistent boundaries for all its young people. The school does not use agency care staff to cover staff absence/sick leave, but draws upon a small bank of staff. This arrangement promotes the continuity of care that the school feels is essential for this group of young people. The school has a clear policy and procedure for the admission of young people. This policy details the criteria for admission to the school and acknowledges the limited number of placements available. Those young people's files inspected evidenced this information, including reports made by designated key workers of home visits prior to admission. The Buddy system operated by the school is positively referred to by the young people and staff spoken to, as it is felt to enable new boarders to quickly feel part of the school. Those young people who are buddies receive training and support for their role. The use of Buddy Benches offers all young people the opportunity to seek friendship/support from those of his/her peers designated as buddies. Each young person is also provided with an admission pack. This contains written, pictorial and audio taped information on the school. The school has a DVD, which provides both pictures and information, set to music, showing life at the school. The DVD includes input from staff and young people. The development of this DVD is exceptional.

Achieving economic wellbeing

The provision is good.

During the school day the young people wear school uniform and bring their own clothing for the evenings. The young people bring pocket money from home and each house had a record of this money for each child. These records accurately reflect the deposits and withdrawals made by the young people. Most young people leaving the school move to other colleges or provisions. The school has a policy on young people leaving the school and supports them and their families in this process. This includes where possible going with young people to visit their next school. The staff at Rowdeford have also been out on recent visits to other schools and said that these help them in talking to young people about their upcoming moves. The Avebury unit actively promotes appropriate life skills and encourages independent living, preparing children for life in further education colleges/other organisations. The school has devised a travel scheme to provide young people with the means to make them independent travellers and gain road safety and stranger danger awareness. This scheme would entail staff initially going on public transport with the young people working toward them travelling on their own. The school's policy of encouraging the participation of the young people in various local clubs e.g. youth clubs, judo is seen as providing further evidence of the school's support for independent living, post Rowdeford. At the time of inspection the young people who were leaving the school at the end of the term were very excited about their leavers' ball. The school is situated in a listed building set in its own grounds on the outskirts of the village of Rowde. This could lead to the school being isolated but the staff are very conscious of this. The staff at the school work hard and imaginatively to provided the young people with a comfortable, pleasant environment. The building is in keeping with the school's statement of purpose. On the ground floor there is wheelchair access for visitors. At the time of inspection there were no outstanding requirements or recommendations from any of the regulatory bodies. The boarding provision is well decorated and very 'homely'. Each young person's room is individually decorated and they can have input into the decoration. Young people are encouraged to personalise their rooms with posters toys and other items from home. The young people's rooms are of an adequate size and in good repair. The school is in the process of refurbishing the units. Although the number of young people who flexi-board has increased each young person has their own bed space which they do not have to share when they are staying at home

during the week. The school should be commended for this approach. Some of the young people do share a room but this was with their agreement. Within the young people's bedrooms was space for private study and adequate storage space. The communal areas were very pleasant, comfortably furnished and provide space for activities and hobbies. The young people also have access to other areas of the school for activities. There were sufficient toilets and bathrooms for the young people. These were nicely decorated. The young people said there was always lots of hot water and they did not have to queue for baths or for showers. There were also adequate facilities throughout the rest of the school. The school has recently adapted one of the bathrooms into a sluice room. This room has a sluice, two toilets and a shower. It is decorated in the style of a domestic bathroom.

Organisation

The organisation is good.

The school statement of purpose is an accurate reflection of the work undertaken. Each young person has an individual file which is kept securely. These files contain all the required information. There was clear evidence that reviews happen as required and educational statements being reviewed and updated. Individual health plans are in place where required and these are detailed and again reviewed and updated regularly. Where a young person is in their last year at the school there is a transfer plan in place to ensure that the move is well managed and as stress free as possible for the young person and their family. The school maintains all the required records and recording in these is clear and concise. The school has a full senior management team which provides a sound structure for the school. The school is well managed and run effectively to provide a safe environment for the young people. There are clear systems in place which ensure policies and procedure are reviewed and updated on a regular basis and that records are monitored. Due to the larger number of boys at the school there is a demand for more boys boarding placements. The school is looking at changing the designation of the units to accommodate this. The senior management team meet on a regular basis to discuss the school and to look for ways to develop and improve the work undertaken at the school. One such initiative is the home school link-worker, which is a new post since the last inspection. It is funded by Barnardos for one year. The role of this scheme is to enhance to relationship between the young people, parents and the school. Referrals to the scheme usually come from the tutors. These are then discussed by the senior management team who select who will be accepted on the scheme. One of the roles of this member of staff is to assist families in contacting agencies and other professions who may be able to offer the family assistance. At the time of inspection six families were involved in this scheme. The member of staff running this scheme is also undertaking a facilitators training course run by ASK on working with parents and other professionals. Topics cover in this training are conflict management and resolution, key principal of parenting, group interaction, better parenting by using reflective learning and diversity to name but a few. The school has an adequate number of staff for the three units. The Head of Care and the Deputy Head of Care have designed a new rota. This means that the Head of Care now has more time off rota for management duties. The Head of Care changes staff between the units so that they can develop skills in working with different groups of young people. The gender imbalance among care staff team is again noted by inspectors. However they also note that the school was able to evidence the work they have undertaken to address this issue. This includes the use of male volunteers and activity coaches, all of whom are CRB checked. The Head of Care is an NVQ assessor and also holds a coaching and assessing award and remains committed to ensuring that staff undertake the NVQ training/qualifications and other care staff training opportunities in the future. There has been

some issues with the NVQs over the last year. This has led to staff having to re do some of their modules as when assessors external to the Local Authority came to inspect the quality of Wiltshire's NVQ training they found that there were some short falls. This has led to the staff and the Head of Care having to do extra work. They have felt disappointed at this as they were working to the guidance provided and the training given to them by the NVQ trainers from the Local Authority. Staff interviewed said that they felt well supported by the senior management team. They felt that senior management team were approachable and operated an open door policy. They said that they are encouraged and enabled to undertaken statutory training and that identified through appraisal but also pursue training in areas of particular interest to them. Some staff said that they would like more training on autism and Aspergers Syndrome. The school has an appropriate policy on staff supervision and appraisals. Staff interviewed reported that supervision takes place but tends to be every two months. Each member of staff receives an annual appraisal. This is a two way process between staff and those carrying out the appraisal. Staff said that they had found this useful in helping them both review their work and set targets and goals for the coming year, this becomes their personnel development plan. All staff have a training portfolio. New staff undergo a comprehensive induction programme. Evidence of both supervision, appraisal and induction was seen on the staff files inspected. Staff also have regular team meeting where there is an agenda to which they can add topics for discussion. Ancillary staff reported that they (cleaners and kitchen staff), meet on a monthly basis to discuss issues but did not receive supervision as such. However they felt able to address any specific concerns with the senior management team. They said that they felt very much a part of the staff team at the school.

What must be done to secure future improvement?

Statutory requirements

This section sets out the actions, which must be taken so that the registered person meets the Care Standards Act 2000, and the National Minimum Standards. The Registered Provider must comply with the given timescales.

Standard	Action	Due date
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Recommendations

To improve the quality and standards of care further the registered person should take account of the following recommendation(s):

Annex

Annex A

National Minimum Standards for residential special school

Being healthy

The intended outcomes for these standards are:

- children live in a healthy environment and the health and intimate care needs of each child are identified and promoted (NMS 14)
- children are provided with healthy, nutritious meals that meet their dietary needs (NMS 15)

Ofsted considers 14 the key standard to be inspected.

Staying safe

The intended outcomes for these standards are:

- children's privacy is respected and information about them is confidentially handled (NMS 3)
- children's complaints are addressed without delay and children are kept informed of progress in their consideration (NMS 4)
- the welfare of children is promoted, children are protected from abuse, and an appropriate response is made to any allegation or suspicion of abuse (NMS 5)
- children are protected from bullying (NMS 6)
- all significant events relating to the protection of children in the school are notified to the appropriate authorities by the head of the school or designated person (NMS 7)
- children who are absent without authority are protected in accordance with written guidance and responded to positively on return (NMS 8)
- children are assisted to develop appropriate behaviour through the encouragement of acceptable behaviour and constructive staff responses to inappropriate behaviour (NMS 10)
- children live in schools that provide physical safety and security (NMS 26)
- there is careful selection and vetting of all staff and volunteers, and monitoring of visitors to the school to prevent children being exposed to potential abusers (NMS 27)

Ofsted considers 3, 4, 5, 6, 8, 10, 26 and 27 the key standards to be inspected.

Enjoying and achieving

The intended outcomes for these standards are:

- the school's residential provision actively supports children's educational progress at the school (NMS 12)
- children have ample opportunity to engage in purposeful and enjoyable activities within the school and in the local community (NMS 13)
- children receive individual support when they need it (NMS 22)

Ofsted considers 12 and 22 the key standards to be inspected.

Making a positive contribution

The intended outcomes for these standards are:

- children are encouraged and supported to make decisions about their lives and to influence the way the school is run; no child should be assumed to be unable to communicate their views (NMS 2)
- children have sound relationships with staff based on honesty and mutual respect (NMS 9)
- children experience planned and sensitively handled admission and leaving processes (NMS 11)

- children have their needs assessed and written plans outline how these needs will be met while at school (NMS 17)
- in accordance with their wishes children are able and encouraged to maintain contact with their parents and families while at school (NMS 20)

Ofsted considers 2, 17 and 20 the key standards to be inspected.

Achieving economic well-being

The intended outcomes for these standards are:

- children can wear their own clothing outside school time, can secure personal requisites and stationery while at school, and are helped to look after their own money (NMS 16)
- children about to leave care are prepared for the transition into independent living (NMS 21)
- children live in well designed and pleasant premises, which provide sufficient space and facilities to meet their needs
- children live in accommodation which is appropriately decorated, furnished and maintained to a high standard, providing adequate facilities for their use (NMS 24)
- children are able to carry out their personal care in privacy and with dignity (NMS 25)

Ofsted considers the key standard to be inspected.

Organisation

The intended outcomes for these standards are:

- children, parents, staff and placing authorities have access to a clear statement of the school's care principles and practice for boarding pupils (NMS 1)
- children's needs, development and progress are recorded to reflect their individuality and their group interactions (NMS 18)
- there are adequate records of the staff and child groups of the school (NMS 19)
- children are looked after by staff who understand their needs and are able to meet them consistently (NMS 28)
- children are looked after by staff who are trained to meet their needs (NMS 29)
- children are looked after by staff who are themselves supported and guided in safeguarding and promoting the children's welfare (NMS 30)
- children receive the care and services they need from competent staff (NMS 31)
- children and staff enjoy the stability of efficiently run schools (NMS 32)
- the governing body, trustees, local authority, proprietor or other responsible body monitors the welfare of the children in the school (NMS 33)

Ofsted considers 1, 28, 31 and 32 the key standards to be inspected.