



Local Safeguarding Children Board
Hammersmith & Fulham, Kensington and
Chelsea and Westminster

Serious Case Review

Southbank International School

Review Chair

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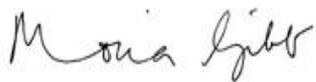
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1. FOREWORD BY THE CHAIR OF THE SERIOUS CASE REVIEW PANEL

- 1.1 I have chaired the review panel that has overseen the serious case review, commissioned on behalf of the Hammersmith and Fulham, Kensington and Chelsea and Westminster LSCB, following the reported sexual abuse of at least 54 pupils at an independent international day school in London. The report that follows has been prepared by two lead reviewers, both experienced in writing serious case review reports. The abuse, which occurred over a period of four years, was perpetrated by a teacher, William Vahey, who is now known to have been a prolific sex offender. The Metropolitan Police reviewed a large number of images of abuse recorded by Vahey and kept on a USB stick. In the interests of confidentiality for victims it would not be appropriate to refer in detail to these but it is important to note that a significant proportion of these images were considered to be of a serious nature. The offences were committed both in this country and on school trips abroad.
- 1.2 The review has found that, whilst aspects of Vahey's behaviour could have alerted senior staff at the school to the possibility that he was sexually abusing pupils, at no point was this given any formal consideration for a number of reasons which are explored in this report. Some of these reasons relate very specifically to the international school itself (Southbank), but the review panel believes that others are likely to be applicable to other schools within both the independent and maintained sectors and it is hoped that this report will contribute to the prevention of child sexual abuse within our institutions.
- 1.3 As well as reviewing a wide range of written evidence, the lead reviewers have conducted interviews with key staff in the school and those employed by its proprietor, Cognita. The majority of staff who spoke to reviewers did not take up the invitation to contribute to the review until it was close to being finalised. The enduring impact on staff of the events surrounding the revelations of the abuse by Vahey was evident during these recent discussions.
- 1.4 Pupils and parents as well as the wider staff group were invited to contribute and, although a small number of parents chose to meet with the authors, none of the pupils or former pupils of the school chose to do so. It may be that there is an enduring impact for pupils and the school should be mindful of this. If, at any time in the future young people affected want to seek to comment or get advice or help they are encouraged to make contact with the LSCB or police and details for anyone wishing to make contact can be found overleaf.
- 1.5 Much at the school has changed whilst the review has been in progress. Key personnel at Southbank have been replaced and new processes have been introduced as the School and Cognita have tried to respond, firstly to the Davies

review (a review commissioned by the school which was published in November 2014) and then to reviews by Deloitte and inspections by Ofsted as well as latterly from greater involvement with the local authority's safeguarding personnel. It has not been an easy time for the school, parents and most importantly for the young people. A desire by the school and its owners to move on quickly meant that much of the early well intentioned work to improve the safety of the school, post Vahey, fell on stony ground. We believe that this is changing and the culture of the school is now more open. I hope that the school will continue to offer opportunities for staff and pupils to come to terms with the distressing events individually and collectively and learn from them.

- 1.6 Finally, I would like to stress that our review has highlighted the overwhelming importance of two things for organisations in protecting children- a culture of openness, including a willingness to recognise and accept that abuse could happen in any organisation and a robust structure to support the effective reporting and handling of concerns about behaviour.

A handwritten signature in black ink that reads "Moira Gibb". The signature is written in a cursive, flowing style.

Dame Moira Gibb
Review Chair

Support for families:

Families who have young people that went on trips organised by Vahey are entitled to support in accessing any information gathered during the Police investigation, and can do so by contacting Westminster Children Services on **0207 641 4000** or the Police Child Abuse Investigation Team on **0208 7858529** and asking to speak to someone in relation to Southbank International, William Vahey, or Operation Kalpasi.

Families can gain emotional support and access to records through this route now and in the future. All enquiries of this nature will be handled sensitively and with respect for confidentiality.

Southbank International School NSPCC Helpline:

Southbank has worked with NSPCC to operate a confidential helpline number specifically dedicated to this case. The helpline is available 24 hours a day. You can remain anonymous and speak to a trained NSPCC specialist who knows the background of this case and can provide support and talk you through your concerns.

To access this please phone 0800 023 2642.

For those living outside the UK, the dedicated NSPCC Helpline can be accessed by using Skype to dial this number and selecting the UK flag from Skype's drop down menu. Alternatively, you can call +44 (0) 203 1883 500 or +44 (0) 203 222 410 and mention that you are making contact in relation to Operation Kalpasi / Southbank International School or William Vahey.

NSPCC helpline:

The NSPCC also offers a free confidential telephone and face-to-face support service that can be accessed in the future by any current or former student, parent or employees who feels affected.

The helpline number is **0808 800 5000**.

You can also access them via email help@nspcc.org.uk

For those living outside of the UK, the Helpline can be contacted on **+44 203 188 3500** or **+44 203 222 4100**, but these calls would be charged.

To access this please phone 0800 023 2642

Young people and children can also access confidential support via Childline by telephoning **0800 1111** or emailing them through their website www.childline.org.uk . The staff are also briefed on the background and ready to offer support.

2. EXECUTIVE SUMMARY

Introduction

- 2.1 This section of the report provides a brief overview of events and the findings of the review. It should be read in conjunction with section twelve which sets out the findings linked to recommendations.
- 2.2 This case review has taken place as a result of serious sexual abuse committed by William Vahey at Southbank International School London (referred to throughout this report as Southbank School). Vahey, an American citizen, was employed at the school from August 2009 until June 2013 when he transferred to the American School in Nicaragua. In Nicaragua, a USB stick owned by Vahey was found to have multiple images of the abuse of school aged children. During subsequent FBI investigations he admitted the abuse but before any further inquiries could take place he committed suicide on 21st March 2014. The abuse of children at Southbank School was discovered following analysis of the USB stick.
- 2.3 The overarching finding of this serious case review is that there were opportunities to recognise the risks posed by Vahey but due to a combination of factors these were not grasped. These primarily relate to:
- leadership and management within Southbank School,
 - the governance and management of the school by Cognita, a private company, in their role as proprietors,
 - the low level of understanding (amongst both the staff and management of the school) of how sex offenders operate which allowed significant indicators of concern to go unrecognised and/or unreported and poor safeguarding systems.
- 2.4 The picture that has emerged during this review is of a complex set of relationships within the Southbank staff team, between staff and the various layers of management and between Southbank School, its Board and Cognita. There are conflicting interpretations of the effectiveness of actions taken by the School and Cognita both before and after the abuse was uncovered. Whilst acknowledging the different perspectives the reviewers have endeavoured to focus on how improvements can be made which are relevant for this school and Cognita and safeguarding more generally.

Background

- 2.5 Southbank School includes schools on three separate campuses (Westminster, Hampstead and Kensington) each with its own Principal. Since 2012 one Executive Principal has been responsible for the management of all three schools. Vahey

taught at the Westminster campus from August 2009 to July 2013 and during those four years sexually abused at least 54 pupils. The abuse came to light after Vahey had left Southbank and no direct allegations were made or investigated by statutory agencies during his time at the school or prior to the discovery of the USB stick.

- 2.6 The proprietors of Southbank are Cognita, a private company which owns 66 schools across Europe, Latin America and South East Asia with 43 schools in the UK. As an independent school, Southbank must be registered by the Secretary of State and comply with The Education (Independent School Standards) (England) regulations¹. As proprietors Cognita have ultimate responsibility for ensuring that the school meets these standards which include standards relating to safeguarding, health and safety and (from January 2015) leadership and management.
- 2.7 Cognita manages Southbank School through a School Board which consists of six parent representatives, the Executive Principal and, two representatives from Cognita. This Board was chaired by the founder and ex chairperson of Cognita until his death in June 2015.

The abuse by William Vahey

- 2.8 William Vahey, an American citizen, joined Southbank School from an international school overseas, having worked in several countries during his teaching career. He had a conviction for sexual offences against young boys in California in 1969 and this conviction resulted in a 90 day jail sentence and five years' probation with a condition that he should be supervised in the company of males younger than 16 during that time. This conviction was not picked up at the point he qualified as a teacher in the United States or by any subsequent employer.
- 2.9 At the time of Vahey's recruitment to a teaching post at Southbank School his wife was highly influential in the international school community and had previously worked with Vahey at the last school he had worked in, where she had been head of school. Recruitment processes within international schools were (and still are) less formal than in other UK schools. It appears that a combination of a direct approach to the school, the perception of his wife's power and influence and recruitment procedures that were not compliant with expected UK standards resulted in his appointment as a teacher at Southbank.
- 2.10 Vahey quickly established himself as a teacher who had an informal, unconventional teaching style and was popular with many pupils. He specialised in

¹The relevant regulations during the period of this review had been published in 2003 and revised in 2010 (coming into force in January 2013). New standards came into force in January 2015.

residential trips and ran the 'travel club' which involved him in selecting pupils and teachers to accompany him on overseas trips. Pupils and some staff fell ill on a number of these trips (often described as due to dehydration, but now believed to be due to the administration of drugs by Vahey) and there was no routine debrief or systematic recording system which enabled a pattern of behaviour to be identified. Within his first weeks at the school, on a residential trip in the UK, Vahey was noted to have had pupils in his room alone and this behaviour therefore became 'normalised' from an early stage. Vahey was "hiding in plain sight", openly bringing to the attention of the school community behaviours, most of which are now known to be part of his pattern of offending.

- 2.11 Other concerning behaviours, both on trips and in school, reported to this review were numerous and ranged from setting inappropriate boundaries to watching boys shower. These behaviours were known to some individual staff within the school but only reported after Vahey's abuse became public. This was also the case in other schools where Vahey had taught and it is of note that the review received information from the superintendent of a previous school describing a behaviour pattern remarkably similar to that at Southbank.
- 2.12 Vulnerability and availability of victims are important aspects of sexual abuse and the picture that emerges is of a sexual predator who chose and groomed his victims carefully. Those pupils who were potentially most at risk appear to be either those with a degree of vulnerability or popular influential pupils, with whom Vahey wished to form an alliance. The prestige associated with being "chosen" to go on travel club trips was just one way in which Vahey exerted power and control within the school community.
- 2.13 Some teaching staff raised concerns about Vahey's behaviour with each other and less frequently spoke to staff who had safeguarding responsibilities. None of these concerns led to any formal safeguarding enquiries. There was only one occasion when any parents raised a concern about his behaviour but when Vahey apologised the complaint was dropped. No pupils ever made any formal complaint, although it is known that he was referred to by some pupils as "paedo Vahey".
- 2.14 The review team has had access to the documentation gathered by the Metropolitan Police as part of their inquiry. Statements obtained from staff give a picture of a prolific offender who was adept at grooming both his victims and the colleagues with whom he worked. Grooming has been defined as "a process by which a person prepares a child, significant adults and the environment for the abuse of this child" and the degree to which Vahey managed to groom both victims and manipulate the environment within which he operated is a significant feature of this review.

Issues arising from this review

- 2.15 Staff recruitment practice in relation to Vahey fell short of expected standards and did not comply with Cognita's own expectations. A significant factor was the problem of obtaining police checks from international jurisdictions where it is expected that this information is obtained in person. There is no well-established system for obtaining such checks and although the review was informed that there are no current plans by central government to develop a system for full international checks the announcement of a pilot project testing access to criminal record information across the European Union² is a welcome step forward.
- 2.16 From its inception, the culture of Southbank school was one of informality. Many of the challenges in developing and maintaining an effective safeguarding system involve achieving a balance between positive relationships, informality and flexibility alongside an enforced framework of "rules" or policies and procedures which set out expected behaviours. There is likely to be a negative impact on safeguarding practice if the pendulum swings too far in either direction. In the case of Southbank School, throughout most of Vahey's time there, the culture was such that the pendulum was firmly at the more informal, flexible end of the spectrum. Within such a culture, roles and responsibilities within the school in relation to safeguarding were unclear, safeguarding leads had insufficient knowledge to fulfil their role and there was no single point of contact for staff who had concerns. Other systems within the school including record keeping and automatic debriefs after residential trips were insufficiently robust.
- 2.17 The review team was puzzled why teaching staff at the school did not recognise and report behaviours by Vahey which clearly fit the profile of a likely sex offender. Alongside an analysis of interview transcripts provided by the Metropolitan Police and the Davies review it has also been helpful to talk to members of staff at the school in order to understand this further and identify a combination of factors which together resulted in a range of behaviours being tolerated and not reported. These factors include:
- lack of training for staff focused on the modus operandi of sex offenders and possibility that sexual abuse could happen in their environment,
 - mixed feelings within the staff, pupil and parent groups about Vahey with some believing him to be a popular and charismatic teacher: this appeared to be confirmed by a survey by the School Board which found him to be the second most popular teacher in the school,

² DBS news November 2015.

- a reluctance to go against the wishes of a small number of parents who did not want further action to be taken even when inappropriate behaviour towards their own children had been identified,
- not wishing to report a concern without “firm evidence”,
- staff being unaware that others had similar concerns.

- 2.18 Even when concerns about the behaviour of Vahey were reported to senior leads within the school, this did not result in reports to the police or any investigations of his behaviour. Prior to 2012 the informal nature of the management style did not facilitate a proper objective enquiry into these concerns. Vahey had assumed a great deal of power and influence within the school community through courting popularity with selected pupils and parents, undermining other staff and by virtue of his wife’s position. There was no formal handover when the Executive Principal joined the school in September 2012 and the power and influence of Vahey resulted in an avoidance of confrontation over safeguarding issues by others, including those in authority. From 2012 onwards safeguarding policies and procedures were reviewed but changes implemented by senior managers did not result in Vahey’s abuse being detected though his competence as a teacher came under close scrutiny and contributed to his resignation.
- 2.19 When Vahey’s abuse came to light in 2014 the management style within the school was different to the informal style that existed pre 2012. The informal style had resulted in a lack of rigour in safeguarding processes whereas the new team focused on compliance; an approach which struggled to manage the impact of such a traumatic event on the school. Reports from the CEOP³ team working as part of the investigation were that the focus of the school was on moving on to the extent that the team were asked not to mention Vahey’s name in sessions they were conducting with the pupils. Some staff report a lack of attention to the emotional impact on themselves and the pupils with a focus on policies and procedures, rather than creating an environment where staff are supported and are therefore able to provide the necessary support to pupils.
- 2.20 Cognita as proprietors have had until recently insufficient oversight of the ability of Southbank School to meet expected safeguarding standards. They were insufficiently proactive as an organisation in managing the immediate aftermath of Vahey’s abuse within Southbank, although they did immediately commission the Davies review and establish a review of safeguarding practice in all other schools across the group.

³ The Child Exploitation and Online Protection Centre (a Command of the National Crime Agency working together with child protection partners to identify threats to children and coordinate activity against such threats)

- 2.21 The day to day response to the aftermath was led by the Southbank management team with considerable direction from the Chair of the School Board. This is in line with the historical position of Southbank within the Cognita group of schools whereby Southbank is treated differently from other schools owned by Cognita. It is the only school with a School Board and a Chair reporting directly to the chief executive rather than via the usual Cognita management structure (see Appendix 3). Moreover the Board Chair initially was also the Chair and founder of Cognita and had significant influence on the direction and management of the school. Southbank therefore has a greater degree of autonomy than other schools owned by Cognita. A new governance structure for safeguarding has been introduced across the group during 2015 but it is too early to evaluate its impact.
- 2.22 The role of the School Board is clearly crucial in holding the Principals of the individual campuses to account for their own standards of safeguarding. However, the Executive Principal (up to July 2015) and Chair of the Board (prior to his death in June 2015) confirmed that safeguarding had not been on the agenda of the School Board and it is only since September 2014 that the Executive Principal was required to provide a termly report on child protection. It will be crucial that in the future the Board provides a degree of scrutiny that is required to make this a meaningful exercise. The most recent Ofsted inspection notes that the arrangements for the Executive Principal to report to the School Board lacks independence, as he/she is both a Board member and lead for safeguarding. The authors of this report agree with that assessment and there will be a need to monitor the effectiveness of the new governance arrangements in this regard.
- 2.23 Southbank as an international school has a high staff turnover, which provides added challenges in developing a safe environment. Staff are likely to have worked in several different countries and both parents and staff may have different expectations of child protection practice from that established within England. Two bodies representing international schools, The Council for International Schools (CIS) and the Council of British International Schools (COBIS) are currently working towards embedding child protection into their accreditation arrangements. A senior leader within Cognita, a Principal of one of the Southbank School campuses and the Local Authority Designated Officer are working with the CIS safeguarding taskforce and contributing to the debate as well as feeding back to Cognita and Southbank. The role of government at a national level is less clear although the access to criminal records pilot (see 2.13 above) will contribute to developments in this area.
- 2.24 Independent schools may choose to be inspected by one of four bodies approved by the Secretary of State. Ofsted also performs a quality assurance role on behalf of the Secretary of State in examining a proportion of reports produced by the other

inspectories. The Secretary of State can also instruct Ofsted to inspect any school at any time. Prior to the revelations about the abuse by Vahey, Southbank School had been inspected by the Independent Schools Inspectorate (ISI) in 2010 and the School Inspection Service (SIS) in 2013. Both reports agreed that the school met safeguarding standards. When Ofsted was asked by the Secretary of State to inspect the school in 2014 (following the knowledge of Vahey's abuse of pupils) a different picture emerged, with safeguarding standards not met. This raises questions relating to:

- the overall reliability of inspections of safeguarding and the differences between and within inspection organisations,
- whether a focused safeguarding inspection is more likely to identify weaknesses in practice than an inspection covering the whole range of standards.

Conclusions

2.25 The abuse of pupils at Southbank School was carried out by an experienced perpetrator who easily got round the safeguarding systems in place at that time.

2.26 Studies of perpetrators of sexual offending in organisations have found a reduced likelihood of abuse taking place where, organisational messages and rules are clear and consistent and the organisational culture is directly focused on the needs of the children (Erooga et al 2012). This is supported by the following description of features of a safe organisational culture which have been used as a basis for developing the following findings and recommendations of this review:

- an explicit safeguarding culture and ethos with values and behaviours which are both articulated and lived at each level of the organisation,
- clear policies and procedures which make it explicit to staff what is expected of them and facilitate the raising of concerns,
- courageous management who are prepared to act appropriately on concerns and staff who are prepared to challenge and raise concerns,
- children and young people having a voice and mechanisms for raising their concerns which are taken seriously.

2.27 Whilst Southbank School has started on the journey towards an organisational culture focused on the safeguarding needs of its children, it remains early days. The three recent inspections by Ofsted identify further continuing work to be undertaken. The impact on the school's culture of significant changes in senior management of the school remains unknown and the school is likely to require a great deal of support in the immediate future.

SEROUS CASE REVIEW FULL REPORT

3. INTRODUCTION TO THE SERIOUS CASE REVIEW

Background

- 3.1 This serious case review has taken place as a result of the abuse committed by William Vahey at Southbank International School London (referred to throughout this report as Southbank School). William Vahey, an American citizen, was employed at Southbank School from August 2009 until June 2013 when he transferred to the American School in Nicaragua. Whilst in Nicaragua a USB stick owned by Vahey was found to have multiple images of the abuse of school aged children. Following dismissal from his teaching post in Nicaragua he returned to the USA and the FBI were informed. During FBI investigations he admitted the abuse but before any further inquiries could take place he committed suicide on 21st March 2014.
- 3.2 As Vahey was known to have worked at Southbank School, the Metropolitan Police were informed and began investigations with staff from Westminster Children's Services and the Child Exploitation and Online Protection Centre (CEOP). These investigations included checking images against photos of pupils at the school and this confirmed that Vahey had abused pupils at Southbank. Investigations included a review of all relevant images in order to ensure that no other adults were involved in the abusive activity, liaising with parents and pupils and working with school staff to review safeguarding practice.
- 3.3 This investigation revealed the seriousness of the abuse committed by Vahey and the Metropolitan Police informed the review that had Vahey not committed suicide, he would have been charged with very serious offences. Although it is clear that Vahey recorded images of the abuse, the police consider that he was acting alone and no evidence has come to light of any other person being involved or of the images being shared more widely.

Southbank School

- 3.4 Southbank is part of a group of schools owned by a parent company (Cognita) who, as proprietors, are ultimately responsible for ensuring that the school meets regulatory requirements. Cognita own 66 schools across Europe, Latin America and

South East Asia with 43 schools in the UK. Details of the organisational structure of Southbank School and its parent company are set out in appendix one.

Reason for the serious case review

- 3.5 Following the exposure of William Vahey's activities, the Board of Southbank School commissioned a review by Hugh Davies QC. This review involved consideration of the school's procedures and practices in relation to recruitment, school trips and child protection. An interim report was submitted to the school in July 2014 with the final report being produced in November 2014 and was made available to the whole school community including parents.
- 3.6 Alongside this internal review (known throughout this report as the Davies review), the statutory guidance in place at the time⁴ required Local Safeguarding Children Boards to undertake a serious case review where the abuse or neglect of a child was known or suspected, the child had been seriously harmed and there was cause for concern as to the way in which "relevant persons" had worked together to safeguard the child. Serious case reviews are broader in scope than reviews commissioned by one single organisation in that they are required to consider the whole multi-agency system and identify any areas for learning and improvement that need to be supported and monitored by the Local Safeguarding Children Board. In addition, there is a requirement that serious case reviews should contribute to wider learning and understanding of how to improve practice, and be published on the Local Safeguarding Children Board website.
- 3.7 The Local Safeguarding Children Board's case review sub-group met on 4th September 2014 and considered whether the circumstances met the criteria for a serious case review. In the light of the definition outlined in 3.6 above, they recommended to the Independent Chair of the LSCB that the criteria had been met. This was because the sexual abuse of children at the school clearly fell into the category of serious harm and that there was evidence that professionals had not worked together to protect pupils at the school from abuse by Vahey. The appropriateness of this decision to conduct a review has been confirmed by the current updated guidance⁵ which has strengthened the definition of serious harm making it clear that it includes emotional harm which is particularly relevant in cases involving sexual abuse.
- 3.8 This report focuses on events at one school where pupils, parents and staff have been through an extremely difficult time since the abuse perpetrated by William

⁴ Working Together to Safeguard Children (2013) Page 68

⁵ Working Together to Safeguard Children (2015) page 78

Vahey has come to light. The terms of reference for this review⁶ were designed to not only focus on specific events but also to understand what happened within the context of an independent international school. It is hoped that by doing so the review will contribute to the wider debate about safeguarding practice within schools.

The review process

- 3.9 Details of the review process are set out in appendix four and this section sets out significant issues that have influenced this report.
- 3.10 The Panel was advised that the contact with pupils or former pupils should be via the route established by the police and children's social care inquiry team, namely through parents rather than direct communication. No pupils responded to the letter of invitation sent to them through their parents and the panel regret that this report has not been informed by the perspectives of young people at the school.
- 3.11 Communication between this review and the School and its parent company, Cognita, has not always been straightforward and the panel now recognise that assumptions were made about Cognita's understanding of the serious case review process and their role within it. It was unfortunate that, due to an administrative error on the Panel's side, a letter sent by Cognita in January 2015 setting out the relationship between the school and Cognita, recruitment processes and the governance of safeguarding went astray. This was only made available to the lead reviewers in August 2015.
- 3.12 Information about changes of very senior staff at the end of the summer term 2015 was not shared with the review panel by Cognita, the School Board or the senior management team. This information was also not shared with the LSCB, DfE and Ofsted or frontline safeguarding officers working closely with school. When the information did come to light the review panel needed to consider any implications for the findings and recommendations of the review.
- 3.13 The change in management also contributed to a further delay to the review process as it was not until the autumn of 2015 that the review team were approached by a member of staff, who suggested that a number of colleagues would now like to contribute to the review. A further opportunity for staff to contribute was then offered and a further nine people were interviewed individually and outside of the school. Some of this group said that they had previously been unwilling to be seen speaking with the authors in a group session held in the school.

⁶ Please see appendix three

- 3.14 It is not the purpose of this review to document in detail the practice changes that have taken place at Southbank School since the abuse by Vahey came to light although they are referred to inasmuch as they provide information which informs the overall findings and recommendations of this review. Statutory guidance⁷ requires schools to supply information to their Local Safeguarding Children Board in order that the Board can monitor the effectiveness of what is being done to safeguard children in their area and provide advice as to how practice can be improved. It is through this mechanism that the effectiveness of changes should be monitored.

The role of Ofsted in relation to the serious case review

- 3.15 Following notification of the abuse carried out by Vahey, Ofsted carried out an emergency inspection which set out a number of areas for improvement and an unannounced progress monitoring inspection in June 2015 also identified where further improvement was required.
- 3.16 An emergency inspection was also carried out by Ofsted at another school which had been set up in September 2013 by some parents of pupils at Southbank School. This school is a completely separate entity but the inspection was carried out as its first Head Teacher had previously been the Principal at Southbank and had employed William Vahey there. A number of former Southbank pupils are now pupils at the new school. The inspection found that safeguarding practice met in full all the requirements set out in the independent school standards in relation to suitability of staff, supply staff and proprietors. This review has had sight of the inspection report and the panel was satisfied that there was no need to carry out detailed enquires into that school as part of this serious case review process.
- 3.17 In addition to direct involvement with the school through its inspections Ofsted have also contributed information to this serious case review and had an opportunity to comment on the final draft.

Events at Southbank School during the course of the serious case review process

- 3.18 While this report was being prepared the panel became aware, through parents at the school, of significant staffing changes at Southbank. By April 2015 both the Principal and Executive Principal had tendered their resignations and left at the end

⁷ DfE (2015) *Keeping Children Safe in Education*

of the school year. The Chair of the review panel did not receive any formal notification from either the school or Cognita until July 2015 and it was only through the staff interviews in October 2015 that a fuller picture of events leading up to the resignations was obtained. Moreover, in the lead reviewers' interview with the Executive Principal in May 2015, no mention was made of the resignations or the implications for the development of safeguarding practice within the school. This apparent lack of openness by Cognita, the School Board and management at the school with a statutory review of safeguarding practice is of concern.

4. STRUCTURE OF THIS REPORT

- 4.1 Southbank School does not exist in isolation. As an international school it is subject to the same regulation and inspection requirements as all independent schools in England and appendix four of this report sets out the overall system for regulating and inspecting schools such as Southbank.
- 4.2 This serious case review report does not replicate the high level of detail regarding specific events necessary for an internal review and contained within the report by Hugh Davies QC. It has however used the helpful detailed information within the Davies report to inform a broader analysis of lessons that can be learnt not only by Southbank but other similar schools. In writing this report, care has been taken to preserve as far as possible the anonymity of those involved. This has meant that the details of Vahey's offences have been omitted and the timeline for his offending, particularly in relation to the timing and nature of school trips, is deliberately imprecise.
- 4.3 The main body of the report is set out as follows:
- section 5 explains the organisation of Southbank school,
 - section 6 provides a summary of the events relating to William Vahey whilst he was at Southbank School,
 - section 7 looks at his abuse of children within the research context of sexual abuse,
 - section 8 analyses relevant factors relating to safeguarding practice within the school,
 - section 9 looks at the place of the school within the Cognita Group and within the wider educational context of the international school community,
 - section 10 considers the role of Regulation and Inspection of schools,
 - section 11 explains the conclusions of the serious case review, and
 - section 12 provides the findings and conclusions.

- 4.4 The appendices of the report provide:
- the terms of reference of the serious case review,
 - an explanation of the review process,
 - the history and structure of Southbank School, and
 - the history of regulation and inspection at Southbank School.

5. **SOUTHBANK SCHOOL**

- 5.1 Southbank School is an “international school”, a term the meaning of which is debated even within the international school community regarding the criteria that should be used to identify a truly international school.
- 5.2 The core elements of most definitions include that the school follows an international curriculum, has a multi-national cohort of students and uses English as the language of instruction. The profile of Southbank school falls clearly within the above criteria with pupils described in the 2013 inspection report as from a wide range of nationalities with the majority being children of parents who are in London on business or diplomatic assignments and most students do not stay longer than four or five years. Many students are bilingual. The International Baccalaureate as the curriculum of choice is in keeping with its international school status⁸.
- 5.3 Southbank School includes schools on three separate campuses (Westminster, Hampstead and Kensington) each with its own Principal. One Executive Principal is responsible for the management of all three schools and reports to a School Board. The School Board was established in 2012 and consists mainly of representatives from the parent group, alongside school and Cognita representation. It sets the overall strategic direction of the school within financial parameters set by Cognita. During the period under review the Chair of the School Board was the founder of Cognita (and ex-Chair of the company) who reported directly to the Cognita Chief Executive. The Chair died shortly before the completion of this review.
- 5.4 During the period of this review there were two Principals of the Westminster campus referred to as Principal 1 (who left in 2012) and Principal 2 (who started in September 2013 and left in July 2015). During the school year 2012-13, a third person, the Executive Principal, carried out the role of Principal of the Westminster campus as well as having a wider remit across all three schools.

⁸ http://www.tieonline.com/view_article.cfm?ArticleAD=87

5.5 Until September 2015 there has only been one person with the job title of Executive Principal. Although this person left in July 2015 and has now been replaced⁹ he/she is referred to as the Executive Principal throughout the report.

6. SUMMARY OF EVENTS RELATING TO WILLIAM VAHEY AT SOUTHBANK SCHOOL

William Vahey's background

6.1 William Vahey's resume sent to Southbank notes that he graduated from California State University in 1973 with a BA in political science. It does not record that he was convicted of sexual offences against young boys in California in 1969 when he was aged 19/20 and this conviction resulted in a 90 day jail sentence and five years' probation with a condition that he should be supervised in the company of males younger than 16 during that time. According to newspaper reports:

"[he] was required to register as a sex offender and update his address whenever he moved, but he never updated this information after the first time he registered [in 1970] and authorities didn't pursue the matter. When the state registry was put online in 2004 his name wasn't included because the authorities found that he was no longer living in California.

After two years' probation he was allowed to leave the country unsupervised following college graduation."¹⁰

6.2 Vahey worked in Saudi Arabia between 1980 and 1992 and during this twelve year period he received a "Principal's certificate" (a teaching qualification) from New Jersey. This was in 1986, seven months before a law took effect requiring all new teachers and administrators to undergo background checks. Although this information from the United States appears to explain why he slipped through their system, the Davies review comments that the FBI informed them that had any prospective employer required Vahey to obtain a criminal record check from the United States, such a check would have disclosed his 1969 conviction.

6.3 From 1992 onwards he was employed in various international schools and his wife became prominent within the international schools community. This review received information from the superintendent of his previous school describing a behaviour pattern remarkably similar to that at Southbank. We do not know the details of what happened at previous schools, but it is clear his behaviour was well established,

⁹ The current Executive Principal is carrying out the role in an interim capacity

¹⁰ Source: *National Post* 13th May 2014

and we have had reports of similar behaviour from the only school that has made a direct contribution to this Serious Case Review.

Recruitment of Vahey as a teacher at Southbank School

- 6.4 William Vahey was employed by Southbank School from 2009 onwards. He had first approached the school via e-mail in October 2008 enquiring as to whether there would be a vacancy for a social studies teacher. He stated that he was currently teaching in an international school but would be moving from his previous location as his wife was scheduled to take up a job as the Executive Director of the European Council of International Schools. In the e-mail he noted that his teaching career had spanned eight international schools in seven countries on three continents. He referred to the fact that he sought active involvement with students outside the classroom and identified his special interest as travel.
- 6.5 From e-mail correspondence and an interview with Principal 1¹¹ it seems that William Vahey toured the school with his wife in the autumn of 2008 but at that time there were no vacancies. He subsequently replied to an advertisement on the school website in May 2009 and this resulted in his appointment as part time maternity leave cover starting on 21st August 2009. His letter of appointment refers to pre-employment checks including List 99 and enhanced CRB and also says '*It would also be useful if you could provide satisfactory police checks from other countries you have lived in particularly your country of residence*'. There is evidence of a satisfactory police check from the location of his previous school, but no other checks on file. There are three references from previous schools, all were very positive with one commenting that he was an outstanding teacher and that they would work with him again without hesitation. The reference from his previous school was from the executive administrator and there is no acknowledgement that Vahey's wife was head of the school at that time.
- 6.6 Following his initial appointment as a part time maternity cover, in September 2010 Vahey was given a full time contract and made an advisor to year 6 (pupils aged 11-12).¹²

Vahey's behaviour

- 6.7 A number of issues relating to Vahey's general behaviour within the school have come to light following his death. These behaviours, reported by a variety of sources include:
- altering accommodation arrangements of the pupils on trips,

¹¹ Interview conducted by the Metropolitan Police

¹² At Southbank School "advisors" broadly perform the function of head of year.

- insisting on having keys to the pupils' rooms,
- giving cookies linked to games during evening activities,
- giving out chocolates and sweets in class,
- making comments to pupils of a sexual nature,
- telling jokes with explicit sexual connotations which made staff feel uncomfortable,
- insisting that he care for sick pupils at night,
- giving an inappropriate and graphic sex education class to pupils at the school,
- slapping boys behinds,
- undermining other staff and being disrespectful to junior staff.

6.8 There are also reports of pupils joking that he was “paedo Vahey”.

6.9 These behaviours were known to a small number of individual staff but at the time were seen as isolated events and were only reported after Vahey’s abuse became public. Other concerns, mainly relating to events on school trips were reported by staff to the designated safeguarding leads but actions taken did not deal adequately with the concerns raised. This is discussed further in paragraph 8.20.

6.10 A direct reporting of a concern was unusual as in most instances parents and colleagues either did not recognise behaviour as a cause for concern or thought that, since others were aware of the behaviour and had not complained, there could not be a problem.

6.11 One example given to this review where staff felt uncomfortable was the way in which Vahey would show (often inappropriate) slides after a school trip. The details of these sessions have been omitted from this report in order not to identify pupils but incidents were described to reviewers where potentially embarrassing stories were told about pupils’ behaviour, some with sexual innuendos. One parent has described feeling at the time this was wrong but they did not complain as members of the school management team were at the meeting. An additional explanation given to the authors for the lack of challenge to such behaviour was a conflict of cultures, with American parents finding this objectionable, but it being seen by them as more usual in European countries.

6.12 Vahey was therefore “hiding in plain sight”, openly bringing to the attention of the school community behaviours, most of which are now known to be part of his pattern of offending. He started these behaviours within his first weeks at the school (for example having a young person in his room during a residential week) and thereby swiftly normalised them.

- 6.13 The review team have had access to the documentation gathered by the Metropolitan Police as part of their inquiry, as well as statements from staff obtained by the Metropolitan Police Service and the Davies review. These give a picture of a prolific offender who was adept at grooming both his victims and the colleagues with whom he worked. Grooming has been defined¹³ as “*a process by which a person prepares a child, significant adults and the environment for the abuse of this child*” and the degree to which Vahey managed to groom victims and also manipulate the environment within which he operated is a significant aspect of this review.
- 6.14 The Metropolitan Police reviewed a large number of images of abuse recorded by Vahey and in order to protect pupils the interests of confidentiality it would not be appropriate to refer in detail to these. However, it is important to note that a significant proportion of these images were considered to be of a serious nature. The offences were committed both in this country and on school trips abroad.
- 6.15 Vulnerability and availability of victims are important aspects of sexual abuse¹⁴ and of 54 pupils who were identified as having been abused by Vahey, 23 are described as having one or more of the following issues: learning need, family problems, and language difficulties being new to the UK. Such children who made up 14% of the school population are therefore over represented in this victim group suggesting that they were directly targeted by Vahey. Other pupils are referred to in the police records as “popular” and within several school files Vahey uses language that suggests he paid particular attention to gaining the approval of such students.
- 6.16 The picture that emerges is of a sexual predator who chose and groomed his victims carefully. The prestige associated with being “chosen” to go on travel club trips was just one way in which Vahey exerted power and control within the school community.
- 6.17 Other methods of exerting power and influence included choosing the school staff who accompanied him on the travel club trips as well as choosing the travel companies who would make up the staff student ratios in the country that was being visited. Furthermore, on these and other trips there is evidence of Vahey undermining the authority of the accompanying staff and enhancing his own popularity with pupils, through agreeing requests refused by his colleagues.
- 6.18 Vahey therefore assumed and maintained his powerful position through establishing himself as a popular teacher with pupils and parents, whose position could, only with difficulty, be challenged by others in the school. This is reminiscent of

¹³ Craven, S. Brown, S and Gilchrist, E (2006) ‘Sexual grooming of children: review of the literature and theoretical consideration’ *Journal of Sexual Aggression*. 12 (3) 287-299.

¹⁴ Sullivan, J and Quale, E (2012) ‘Manipulation styles of abusers who work with children’ in Erooga M (ed) *Creating safer organisations*. Chichester: Wiley

behaviour described in a previous serious case review into abuse within a school where the abuser was described as having “very strong relationships with many of the parents, particularly in relation to his drama club”.¹⁵

- 6.19 Although popular with some colleagues, Vahey is most often described¹⁶ as setting himself apart from the staff group and bullying colleagues; for example being very unpleasant when he disagreed with the timetabling of his lessons. An additional and significant factor was his wife's power and influence in the international school community, and her perceived ability to negatively impact on people's career prospects.

Residential trips and reporting of concerns about Vahey's behaviour

- 6.20 Almost immediately after starting at the school William Vahey accompanied pupils on a discovery week trip within the UK. This took place after police checks had been returned from his previous school but before the Criminal Records Bureau check had been returned from the UK authorities.
- 6.21 Discovery weeks are residential activities which are an established part of the school year at Southbank. One takes place at the start of the school year and has been described as a “bonding week”. The second week takes place in the summer term and is curriculum based. Therefore, from the beginning of his time at Southbank, Vahey was playing a key role in regular residential activities and his presence on the first trip of the school year meant that he was able to assess victim vulnerability from the moment new pupils joined the school. At this point they would be unfamiliar with the school and its systems and would have no established friendship groups.
- 6.22 The travel club started by Vahey involved taking groups of pupils on trips abroad, often to tropical or far flung destinations. He is described as being in control of all the arrangements for the club including choosing which pupils and members of staff should go. There are descriptions of a big build up to the trips with an information session to pupils and parents and Vahey then exercising complete control over whose applications to accept. This was different from the usual method that existed within the school of “first come first served”. The exact status of the travel club is still somewhat unclear, with some staff describing trips as not under the auspices of the school, whereas the understanding of the Executive Principal was that they were school trips since approval and finance had been organised via the school system.

¹⁵ LB Hillingdon (2011) *Executive summary of the serious case review written about teacher Mr X.*

¹⁶ Metropolitan Police interviews

6.23 There was additional ambiguity regarding the role of Cognita head office in agreeing that a trip could go ahead. Prior to 2012 there had been little contact with head office but when a new Head of Compliance came into post she queried the staffing ratios on one particular travel club trip and was informed via e-mail that:

'Bill Vahey is the trip leader and has conducted such trips for over 20 years. He will supervise 17 students on the flights and [a female staff member] will supervise 16 students on the flights also. We are well aware that this does not meet the minimum ratio requirement, but we have looked into this thoroughly. Should you have any questions regarding this matter please refer them to [the Executive Principal].'

6.24 In spite of these concerns from the Cognita Head of Compliance, the trip went ahead with her consent as, due to the very late submission of the approval form to Cognita head office, it would have been very difficult to cancel the trip. School staff recall that this trip was significant as several teachers had been approached by Vahey to go on the trip but had declined. By this stage individual members of staff had reservations about the way that Vahey's behaviour undermined the authority of others. The member of staff who went on the trip was not one of the teaching staff and was completely unaware of any previous concerns about his behaviour.

6.25 There are a number of events linked to specific residential activities that are relevant in relation to this review and the most significant are summarised below in order to highlight the range of Vahey's behaviours and responses by those that came into contact with him. In order to protect individual victims, the type of trip, dates and location are not referred to in this report. In line with the Davies review other identifying details such as the type of accommodation is also referred to by the generic term "room" although this may have been a tent, hotel room or cabin.

Trip One	Vahey told another teacher that a pupil had been sick in the night and he had stayed in his room to check on him. An incident form was completed in respect of the pupil's sickness but no other reports were made regarding the inappropriateness of Vahey's response. ¹⁷
Trip Two	This was a trip overseas and <i>after</i> Vahey's abuse came to light it was reported by a staff member who had been on the trip that Vahey suggested playing an inappropriate game and in addition he insisted on having keys to all the rooms. This was not reported to anyone at the time.
Trip Three	For this trip overseas the only two teachers with the group were Vahey and a female teacher. A pupil fell ill, was given medication by Vahey and later

¹⁷ Source: police timeline

	<p>fainted and woke up several hours later. The second teacher was told by Vahey that for various reasons the pupil was embarrassed and the incident should not be mentioned to anyone else. This incident was therefore not reported at the time.</p>
Trip Four	<p>During this trip Vahey had been noted to be allowing pupils food that had been refused by another teacher. Vahey was described by this teacher as always overstepping the mark on that trip in small ways. During the trip Vahey took an ill pupil into his room. The teacher confronted Vahey and reported this incident to a Head of Pastoral Care on their return. It was the view of the Head of Pastoral Care that Vahey had been looking after the pupil and that no further action was required.</p> <p>The teacher on this trip informally discussed what happened with the teacher who had been on trip one and they commented on the similarity of the two incidents but did not take this further. The teacher on the trip also told another member of staff who was therefore on guard when s/he went on a subsequent trip with Vahey.</p>
Trip Five	<p>After Vahey's death a former teacher told the police of a trip when a boy was sick in the night and Vahey gave the boys cookies and told them to keep their doors open. This was not reported at the time.</p>
Trip Six	<p>Vahey and one other member of staff were the only two teachers on this overseas trip. A pupil was taken ill and Vahey had him in his room overnight. This came to light seven months later when pupils were heard talking about it.</p> <p>The member of staff who became aware of the issue knew about the incident on trip four and spoke to a child protection lead who advised the teacher to speak directly to the pupil and their parents. This was done, the pupil had no concerns and the parent spoken to was grateful that Vahey had helped their child.</p> <p>The child protection lead along with the member of staff who had become aware of the issue, spoke to Principal 1 (who at the time was the other child protection lead). He and the first child protection lead met with Vahey who was described as "charming" during the discussion. His story corroborated that of the pupil and parent and since there were no complaints from the parents or child, the Principal decided that there should be no further action. A record of this meeting was kept in the first child protection lead's drawer.</p>
Trip Seven	<p>Vahey was noted by another member of staff to be acting strangely by insisting on being alone with a boy who had fallen ill on this trip. The</p>

	<p>member of staff tried to call the Head of Pastoral Care but could not get through. They later discussed their concerns with another teacher who was aware of the incidents on trips four and six. They suggested that the Head of Pastoral Care did need to be informed. According to the teacher, the Head of Pastoral Care agreed to deal with this and speak to Vahey. The Head of Pastoral Care did not make a record of this conversation and did not speak to Vahey since he did not regard this as an official complaint.</p>
Trip Eight	<p>There were only two teachers on this trip, Vahey and a colleague. The colleague went for a drink with Vahey and reported after Vahey's death that s/he found it very difficult to wake up in the morning after the drink.</p>
Trip Nine	<p>This was a trip overseas with only two teachers (Vahey and a female teacher) on the trip. There were a number of incidents on this trip including the female teacher falling ill, Vahey discussing pornography with pupils and having a master key to the rooms.</p> <p>Following the trip parents did complain to Principal 1 about the discussions regarding pornography. Again this was raised with Vahey in an informal manner, Vahey directly apologised to the parents if his comments had been misconstrued and the parents decided that they did not wish to take this further, trusting the school to have handled the situation.</p>
Trip Ten	<p>This was an overseas trip with two members of Southbank staff. Prior to the trip the Head of Compliance at Cognita had raised concerns about the pupil/ staff ratio and this was raised with the Executive Principal. He was told by Vahey that once the group arrived at the destination trusted local guides would join the group and the ratios would therefore be sufficient. On this basis Cognita gave consent for the trip to go ahead. Similar issues to previous trips have now been reported including illness amongst the pupils resulting in a pupil spending the night in Vahey's room. There is also a report of a local guide leaving a pupil's room. This was not reported at the time.</p>
Trip Eleven	<p>On a trip within the UK, it came to light after the death of Vahey, that he had played a game with pupils involving cookies, that sleeping arrangements were altered and that he was known to have been alone with a pupil. This was not reported at the time.</p>

6.26 In summary:

- Vahey led 11 trips for pupils during the four years he worked at Southbank. During these trips there was a repeating pattern which involved:

- six instances of pupils being sick in the night and staying in his room or of fainting and waking up several hours later
 - giving cookies to pupils, linked to games during evening activities
 - two instances of the playing of inappropriate games / discussions about pornography, with in one case a complaint made by parents and the acceptance of Vahey's apology
 - three instances of Vahey having the keys to all rooms or a master key
 - illnesses reported by pupils, often explained by Vahey as linked to dehydration
- Vahey selected his colleagues for trips, often choosing inexperienced staff. He chose to only have only one colleague on at least two occasions, explaining his intent to supplement this with trusted local guides. He had a tendency to undermine his colleague in front of the pupils, so forming an alliance with the children. On two occasions his colleague on the trips fell ill or had difficulty waking up after socialising with him,
 - No reports were made by his colleagues at the time of about seven incidents of concern (learnt about after Vahey's death), although the three occasions when reports were made did not lead to any or an adequate investigation.
- 6.27 Just prior to one of the trips, Principal 1 was approached by the member of staff who had reported previous concerns about Vahey and said that s/he did not wish to go on a residential trip with him in the future. As a result, before Principal 1 left the school, Vahey was removed from a school trip.
- 6.28 The timing of this is significant as it has been reported by more than one member of staff that the new Executive Principal was made aware of these concerns but continued to sanction Vahey's role as a leader of residential trips in spite of this knowledge. It is surprising that there was no formal handover between Principal 1 and the Executive Principal. Instead, according to Principal 1 he left written handover documents which would have contained this information; but, although the Executive Principal recalls these notes, he does not remember any information warning him about Vahey. These handover notes have apparently not been retained.
- 6.29 Other members of staff recall in a meeting with the pastoral leads that the Executive Principal asked to see, and was shown, the child protection file. This file contained some correspondence relating to concerns raised about Vahey and the decision that he should not accompany school trips. A staff member recalls telling the Executive Principal (although the Executive Principal has no recollection of the conversation) that Vahey was not suitable to go on a trip but was not questioned

further about this. Vahey was consequently not prevented from going on subsequent school trips.

Vahey's competence as a teacher

- 6.30 There are varying accounts as to how far colleagues appreciated Vahey's teaching style but the general picture that emerges is that up until the time that the Executive Principal started at the school the view of parents and many staff in the school was that he was a good teacher. This view was based on his popularity with pupils and this view had been confirmed by a parents' survey conducted by the School Board, which identified him as the second most popular teacher in the school.
- 6.31 However, once the Executive Principal started at the school a senior member of staff brought to his attention concerns about the standard of Vahey's teaching and his unwillingness to engage with proposed changes in the humanities curriculum. As part of his routine observations of staff the Executive Principal also observed for himself one of Vahey's lessons and felt concerned at the lack of content; although his capacity to engage with the pupils was obvious.
- 6.32 Vahey was very unhappy with the results of his appraisal and is reported to have threatened his Head of Department with using his wife's influence to put a "concrete ceiling" on her career. Vahey also complained to the Chair of the School Board who in turn asked the Executive Principal to account for the disagreement as "the second most popular teacher was threatening to leave".
- 6.33 It had also come to the Executive Principal's attention that Vahey had derided the changes in his department and the school to a parent and, although Vahey denied doing this, it did result in a warning letter to him from the Executive Principal stating that should a similar incident happen again he may believe there was some validity to the charge. After this incident Vahey remained polite and did not outwardly appear to be nursing a grudge, but in January 2013 he tendered his resignation, leaving the school at the end of that academic year.
- 6.34 Vahey left the school with a good reference which was written by someone who was not a member of Southbank's senior management team. He obtained a job in the American School in Nicaragua where his USB stick was stolen and the abusive images found. This led to him being dismissed, returning to the USA and the FBI being informed. He committed suicide in March 2014.

7. ABUSE IN CONTEXT

- 7.1 This section of the report seeks to explore the underlying factors that allowed Vahey to continue to abuse pupils without detection over a number of years.
- 7.2 A well-respected model for understanding the preconditions that underpin sexual abuse¹⁸ outlines four aspects: (1) the need to understand the offender's motivation; (2) how they overcome internal inhibitors which may stop others with a similar motivation; (3) how they overcome external inhibitors; and finally (4) the methods the offender employs to overcome any resistance offered by the child. Erooga¹⁹ comments:
- 'Aspects of preconditions 1 and 2 may be accessible during a selection and recruitment process, precondition 3 is potentially an issue which can be addressed through organisational situational prevention methods....and precondition 4 by organisational empowerment of children about their rights and legitimate expectations of those working with them This last aspect can only ever be a lesser component of an approach to protecting children and care should be taken to in no way imply that children have the responsibility for their own safety with adults who have responsibility to care for them. (p17)'*
- 7.3 In relation to institutions, Erooga²⁰ goes on to note that the organisational context is an important factor in prevention. Abuse is more likely in closed inward looking organisations where the organisation does not believe that abuse could occur, there are power imbalances amongst staff and a failure of management at every level to respond to concerns.
- 7.4 Information that is available regarding William Vahey and events at Southbank School points to a prolific offender who, many years before starting at Southbank, had overcome any internal inhibitions to abuse and had successfully worked (and abused children) in a number of schools. The focus of this report therefore needs to be whether or not there are lessons to learn about the context within which the abuse took place. This context is wider than simply the school itself since Southbank School does not exist in isolation; it is an independent school, operating under the English regulations governing such schools, owned by a parent company and a member of the international schools community. As such, consideration of an organisation and its capacity to keep children safe needs to reflect the complexity of the wider system.

¹⁸ The four preconditions model developed by Finkelhor (1984) *Child Sexual Abuse: New theory and research*. New York: Free Press

¹⁹ Erooga, M (2012) 'An overview of the relevant literature: part one' in Erooga, M (ed) *Creating Safer Organisations* Chichester: Wiley.

²⁰ Erooga, M (2012) 'Understanding and responding to people who sexually abuse children whilst employed in positions of trust: an overview of the relevant literature-part two: organisations.' in Erooga, M (ed) *Creating Safer Organisations* Chichester: Wiley

7.5 The evidence from this case review is that there were a number of interacting factors which facilitated Vahey to abuse undetected for many years. The following analysis considers these factors under three headings:

- Section 8: Practice within the school
- Section 9: Relationships across the system
- Section 10: Regulation and inspection

8. PRACTICE WITHIN SOUTHBANK SCHOOL

Staff recruitment and overseas checks

8.1 The recruitment process for William Vahey fell well short of expected standards of safer recruitment and also did not comply with Cognita's own expectations. Seven steps to safer recruitment had been developed by Cognita head office and were available to schools but each school managed recruitment in their own way with little oversight from Cognita. The interim report of the Davies review confirmed that: *'Southbank's written recruitment and vetting practices at the time of Vahey's recruitment did not comply with the detail of statutory guidance in force at the relevant time'* (para 8.11.1) and that their policies did not comply with the policies and practices supplied by Cognita, *'Although Southbank appears to have had discretion to depart from these'*. (Para 8.11.12):

8.2 The interim report sets out four areas where the recruitment of Vahey failed to comply with statutory guidance;

- The role which he was offered was not advertised, and neither a job description nor a person specification was created*
- He was not asked to fill in an application form (having sent in his CV, unsolicited, some months earlier), or given a candidate information pack or invitation to interview which referred to Southbank's commitment to safeguarding;*
- No reference checks were carried out before the interview and references were not requested until he had been conditionally offered a role, some months later; and*
- It appears [Principal 1] interviewed Vahey alone (para 8.11.3)*

8.3 One contributor to this review²¹ commented that within Cognita there had been too much reliance on the on-line safer recruitment training which was the accredited training under statutory guidance at the time.²² It was only since the Vahey case

²¹ Cognita staff interview

²² This on line training was updated by the NSPCC in Spring 2015.

that the central HR team had taken responsibility for safer recruitment and in setting clear standards for schools. In addition to having and following the correct procedures, the skills of the interviewer in exploring the applicant's motives and suitability to work with children are an important aspect of the process and on line training is unlikely to develop the skills needed. A study into the most effective interviewing techniques²³ concluded that four key areas were common amongst those who abused children in professional settings and these could helpfully be explored in the interview process:

- awareness and observation of professional boundaries,
- appropriateness of relationships with children,
- commitment to and evidence of taking action to protect,
- self-awareness.

8.4 Although Principal 1 had completed on line safer recruitment training, there is no evidence that these areas were explored with Vahey or any other member of staff. Although, given Vahey's manipulative behaviour, it cannot be said with any certainty that use of value-based interview techniques would have alerted Principal 1 to any concerns, their use would have given a strong message to Vahey that safeguarding children was high on the agenda of the school.

8.5 It is in relation to safer recruitment that the specific challenges of Southbank as an international school become apparent. The review team have been informed that within the international school community there was an informal approach to recruitment with staff often being hired via recruitment fairs and with applicants often having limited time in the country to attend for interviews. The original direct approach by William Vahey to Southbank would not have rung any alarm bells as being unusual. Moreover, it is not common practice in any school (or the wider children's workforce) to approach all previous countries within which people had worked for criminal record checks although in Vahey's case the school suggested he should obtain one from his country of origin but did not follow up when this was not received.

8.6 The Davies review makes a recommendation that:

'there should be a mandatory criminal record check for future employees for each country in which the applicant has lived or worked since the age of 18 years subject to a minimum period of three months' residence. Further, and regardless of recorded periods of residence, it should be mandatory to obtain a criminal record check from the applicants country of nationality.'

²³ Erooga (2009) *Towards safer organisations: Adults who pose a risk to children in the workplace and implications for recruitment and selection*. London: NSPCC

8.7 Schools, employers and the wider children's workforce will need to be supported in this task by an international system that provides the relevant information. The reviewers were told that many countries insist that the record is obtained from them by the applicant in person and this would provide an insurmountable obstacle for some prospective applicants and/or employers. Home Office guidance confirms that the process varies from country to country²⁴. The Department for Education was asked whether any work was being done to systemise the checking of individuals who have lived and worked abroad in order to provide more assistance to schools in doing this. The answer received was that '*the department is not pursuing anything in this field, and is not aware of anyone else doing so.*' However there is now a pilot project testing access to criminal record information across the European Union²⁵ and the review welcomes this as a step forward.

8.8 The review has also been informed that the Council of International Schools is working with Interpol to develop a standardised certificate of good conduct via an Interpol database. This may also provide a way forward.

Roles and responsibilities in relation to safeguarding

8.9 Designated safeguarding leads are the cornerstone of effective safeguarding within schools.²⁶ The evidence suggests that during the time that Vahey was at the school the role of the designated safeguarding lead was not well developed. In interview²⁷ one of the leads sounded unsure as to who the other lead was and thought it was probably the Principal of the campus. Although one designated lead did refer to keeping a child protection file and another spoke of keeping personal notes, the system for ensuring that this information informed future decision making about the pupil or member of staff was not clear. There was no single point of contact for staff, safeguarding leads did not meet together to discuss cases, information was not shared and consequently any patterns of behaviour were likely to be missed.

8.10 Designated leads did speak of attending child protection training delivered by the Local Safeguarding Children Board but interviews and the Davies review refer to this being mainly focused on recognising and responding to abuse within the family, rather than managing concerns about staff. A review of the materials confirms that this was the case.

²⁴<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

²⁵ DBS news November 2015

²⁶ DFE (2015) *Keeping Children Safe in Education*

²⁷ Source: Metropolitan Police interviews

- 8.11 The training that was delivered in house to staff on a yearly basis did refer to allegations against staff and whistle blowing, although there is little reference to recognising abuse within an institutional environment. As commented to the Davies review team:
- 'The training did not really touch on child protection issues relating to members of staff – it was more about abuse in the home because there was a mix of professionals in the room.'* (SH/Davies page 3)
- 8.12 This is not specific to Southbank School and has been a feature within other serious case reviews which have noted: there had been no specific training for designated safeguarding leads which focused specifically on the details of setting up a safe child protection system (including recording). There had been a reliance on multi-agency training which designated leads are expected to disseminate throughout the school. Whilst such training is important in developing an understanding of the signs and indicators of abuse and working together across agencies, it does not provide the detailed information that all school staff need in relation to identifying concerns and sharing and recording information within the school.²⁸
- 8.13 Designated safeguarding leads need clarity of role within the school and sufficient training to enable them to carry out their responsibilities. In this case, although the Ofsted inspection following the revelations about William Vahey commented that they had received appropriate training, the report went on to comment that they were not aware of the revised statutory guidance. That lack of awareness about a key document suggests that the training they had received was not effective. In addition Ofsted noted that 'they do not demonstrate that they have sufficient status and authority within the school to influence its safeguarding policy and practice....they are not involved sufficiently closely with either the senior leadership team or the proprietor in updating and reviewing the school's child protection policy.'
- 8.14 A follow up inspection by Ofsted carried out in October 2014, noted that a clear job description for safeguarding leads was now in place.
- 8.15 The other area where roles and responsibilities were unclear was in relation to school trips. The interview transcripts provided to this review show that some staff believed that Vahey's travel club lay outside the ordinary school trip system whereas others (including the Executive Principal) understood them to be a school trip and therefore subject to the same scrutiny. This lack of clarity, particularly in the early days of the travel club, would have assisted Vahey in exerting an inappropriate level of power and control in relation to trip arrangements. For

²⁸ Coventry LSCB (2014) *A deeper analysis of the findings of the Daniel Pelka serious case review*. <http://www.coventrylscb.org.uk/files/Deeper%20Analysis%20Report%20version%204%203.14.pdf>

example, there was evidence that Vahey was not expected to employ the staff ratios expected for other school trips and staff did not know how to challenge this.

- 8.16 There was an additional layer of complexity in relation to roles and responsibilities for trip arrangements which relates to the relationship between Cognita and Southbank School. In essence, although the new Head of Compliance at Cognita expected to have a role in approving trips at Southbank in the same way as with other schools in the organisation, this system was (and still is) felt to be unwieldy by Southbank. Emails from that time show that the Executive Principal was unhappy when the Head of Compliance queried staff ratios on one of Vahey's trips as it was believed that ratios would be acceptable when travel company staff joined the group at the destination. The Head of Compliance was equally unhappy about being asked for approval at such a late stage that it would have been very difficult to cancel the trip. This trip went ahead leaving a lack of clarity regarding the role of Cognita in the process and concerns about the adequacy of arrangements. There have been many subsequent discussions about this issue and, following the interim report by Hugh Davies QC, action was taken resulting in a trip approval system which leaves total responsibility for trip approval with the Executive Principal. The final Davies review report comments that:

"Any ambiguity that existed between the School and Cognita as to who ultimately authorises trips has been resolved: in future, the authorisation will be the responsibility of the Executive Principal. Given his direct responsibility for safeguarding at the School this is both the most efficient and accountable outcome. The person with direct responsibility for safeguarding should be the most informed party when it comes to authorising individual trips, and this person should work within the school"(para 5.10)

- 8.17 Whilst this is a reasonable outcome, it does not obviate the need for effective oversight of decision making and good quality assurance systems.

Record keeping

- 8.18 Good record keeping is a fundamental aspect of good safeguarding practice both in respect of concerns regarding pupils and allegations made against teachers.²⁹ The Metropolitan Police, CEOP and the Westminster City Council team responsible for inquiries following the revelations about abuse by Vahey at the school described pupil records that lacked consistency and thoroughness. In addition the team were concerned that in some cases the school did not always provide the inquiry with records in a timely manner or at all. The files that were seen by a member of the team who has recent experience of auditing files in another independent school

²⁹Keeping Children Safe in Education (2015) page 41.

were described at the time of their inquiries in 2014 as significantly below expected standards. The Davies review also noted that the child protection files relating to pupils were “not fit for purpose” but went on to say:

'Given that two independent inspections (in 2010 and 2013) were apparently satisfied with the form of these records, however, I make no particular criticism of the individuals responsible for maintaining them as they did. In future however they must be comprehensive and comply with the statutory guidance.'

- 8.19 The review disagrees with this conclusion by the Davies review as both school and proprietors had a responsibility to be aware of the limitations of their own systems and not to rely on inspections to highlight concerns.
- 8.20 In addition to problems with the pupil records the investigation team found that other records were incomplete. For example pupils were expected to write a reflective account of each residential trip and these were requested by the police investigation team. They found several were missing and could not be located by the school and all those that were available gave a positive account. Whilst it is not known whether the missing records did or did not raise any concerns, it is worrying that the school did not notice that records of the trips were incomplete.

Recognising behaviour that should have been a cause for concern

- 8.21 The review team were initially puzzled about the lack of recognition and reporting by teaching staff at the of Vahey's concerning behaviours. Interviews with staff members, along with an analysis of interview transcripts provided by the Metropolitan Police and the Davies review have enabled us to identify a combination of factors which together resulted in a range of behaviours being tolerated and not reported. These factors include:
- lack of training for staff focused on the modus operandi of sex offenders and the possibility that sexual abuse could happen in their environment,
 - mixed feelings within the staff, pupil and parent groups about Vahey with some believing him to be a popular and charismatic teacher; this appeared to be confirmed by a survey by the School Board which found him to be the second most popular teacher in the school,
 - a reluctance to go against the wishes of parents who did not want further action to be taken even when inappropriate behaviour had been identified therefore not recognising safeguarding concerns for the wider school population,
 - not wishing to make a complaint or express a concern without “firm evidence”,
 - staff being unaware that others had similar concerns,

- a lack of inquisitiveness on the part of senior staff in relation to the concerns or complaints from individuals about Vahey’s conduct.

Listening to concerns and managing staff behaviour

- 8.22 The revelations regarding William Vahey did not come totally “out of the blue”. Although some staff and pupils have only recognised the implications of Vahey’s behaviour, or felt able to speak about their concerns, after the details of the abuse came to light, others did raise concerns at the time. As highlighted by the table in section five, there were several instances where staff discussed concerns with colleagues and some of these also came to the attention of safeguarding leads and Principal 1. In addition, although the Executive Principal does not recall this, staff interviews³⁰ have suggested that concerns about Vahey’s attendance on school trips was brought to the attention of the Executive Principal soon after appointment. In spite of concerns Vahey was allowed to lead trips until he left the school in 2013.
- 8.23 It is difficult to fully understand how this happened as:
- whilst Principal 1 cannot recall how or why the decision was made to remove Vahey from the trip, he does remember leaving a handover note which included “make sure Vahey is accompanied by an experienced Southbank staff member on all trips”,
 - the Executive Principal recalls the handover note, but not information within it which would have alerted him to concerns relating to Vahey.
- 8.24 There is no record of the note in the school file but the key point here is the importance of precise recording, since the record as described by Principal 1 was ambiguous. Although further questions should have been asked about any concerns regarding a teacher, the combination of ambiguity and possibly the competing demands of a new role seems to have allowed this to slip through the net.
- 8.25 A second issue emerging from this episode is the advantage of face to face handover meetings between senior leaders. In such meetings the significance of information that might not stand out within written records can be explored. In this case the Executive Principal was working overseas and did not have an opportunity to meet the outgoing Principal before he left at the end of the summer term. The problem was exacerbated by the nature of the departure of the previous Principal which was not on good terms with the Chair of the School Board. Any further

³⁰ Source: Metropolitan Police interviews

contact with the Executive Principal after he had arrived at the school may have been difficult, although he was leading a new school less than a mile away.

- 8.26 A second area of discrepancy is in relation to the recollection of the (then) Executive Principal and accounts of staff members³¹, who remember warning him about Vahey soon after he arrived. However, the Executive Principal does not recall these warnings and there is no record on file. Given that it has been difficult to piece together an agreed version of events again the more general lesson is the need for clarity of communication both orally and in writing. The problems with record keeping outlined above were a crucial contributory factor to a failure to identify accumulating concerns about Vahey.
- 8.27 An additional issue was the method of managing any concerns raised about staff during the time that Principal 1 was head of the Westminster campus. This was generally by way of a “friendly chat”³² with the person concerned. The approach taken was to “get everyone in the room” and look at each incident on its merits. The lead reviewers were informed by a parent that their child did not report an incident with Vahey because they knew that a senior staff member would bring the pupil and Vahey into a room together.
- 8.28 The recommendation from the Davies review is that teachers and staff should be mandated under the School’s Code of Conduct to notify the safeguarding lead of any conduct that they suspect may be inappropriate. This helpfully widens the scope of behaviour that should be included but it will be crucial that safeguarding leads have the capacity, knowledge, skills and supervision to manage this increase in work. Pupils need to be made aware of this as well as staff, and the next important stage is to ensure that the response to any reported concern is consistent with statutory guidance³³ and gives confidence to all concerned that the approach is no longer the informal process described above.
- 8.29 Contributors to the review suggest that issues remain in relation to the response to wider concerns about what is and is not appropriate behaviour. The authors were told of an individual perceiving themselves as receiving a hostile response to articulating concerns about staff behaviour and boundaries (with each other and not with children). Whilst this may not have been seen as a specific safeguarding issue for children, such a perceived response is unlikely to encourage an open culture of discussion about what is and what is not appropriate behaviour.

³¹Source: Parent/staff interviews.

³²Source Metropolitan Police interviews

³³ DFE (2015) *Keeping Children Safe in Education*

- 8.30 The approach of bringing people together to discuss concerns about members of staff appears to have continued after 2012 and was endorsed by the Chair of the Board. When concerns about the management style of the Executive Principal and Principal 2 were brought to the attention of the School Board Chair his response was to set up a meeting with all staff together so they could air their views. A more appropriate response would have been to work with Cognita as proprietors to consider and investigate each complaint in its own right and take responsibility for any management action required.

Parental views, responses to safeguarding concerns and potential confusion with a complaints process

- 8.31 On one occasion when concerns were raised by a member of staff about Vahey's behaviour no further action was taken as the parents of the pupil did not feel that this was needed. On another occasion Vahey apologised to the parents and his apology was accepted. The views and wishes of the parents therefore overrode any objective consideration of risk by professionals who should have had knowledge of indicators of abuse. There are two issues here, firstly the weight given to the wishes of parents and secondly whether professionals felt secure enough in their child protection knowledge to act in the best interests of the pupil (and other pupils), whatever the parental views.
- 8.32 Giving undue weight to the views of parents who may not have the full picture appears to confuse the response to safeguarding concerns. Instead of a complaints process where the school will act where a complaint has been made, taking account of a range of information, the onus for action was driven by parents' concerns and complaints, as opposed to the wider perspective of the safeguarding of children.

Maintaining a school culture that promotes safe practice

- 8.33 Southbank School was described to the reviewers as a school which had a liberal ethos from its inception. As the school expanded, this ethos remained and included a high level of informal contact between groups of parents and some socialising between parents and staff. This continued during Vahey's time at the school with reports of him having been invited to individual family social events.
- 8.34 Many of the challenges in developing and maintaining an effective safeguarding system involve achieving a balance between positive relationships, informality and flexibility alongside an enforced framework of "rules" or policies and procedures

which set out expected behaviours. There is likely to be a negative impact on safeguarding practice if the pendulum swings too far in either direction.

- 8.35 In the case of Southbank School, throughout the majority of Vahey's time there, the culture was such that the pendulum was firmly at the more informal, flexible end of the spectrum. This was a result of both the culture of the school itself and the ineffectual nature of the oversight by Cognita. To a large degree the latter was influenced by the perceived "difference" of Southbank School within the group. The School Board exercised considerable power in relation to the day to day running of Southbank despite the mandate of the Board being to set and oversee the strategic direction of the school. Despite this, they were insufficiently robust in interrogating safeguarding arrangements relying on issues being brought to their attention, rather than assuring themselves that systems and processes were fit for purpose. This is explored further in section nine.
- 8.36 The informal nature of the school before September 2012, without the scaffolding of a clearly articulated and implemented safeguarding framework resulted in Vahey being able to exploit the blurred boundaries between staff, parents and pupils. His popularity with pupils and parents, partly due to his unconventional teaching style, resulted in a powerful position within the staff group (further supported by the influential position of his wife), and lack of scrutiny of his behaviour by management. This situation was exacerbated by a lack of clarity about the boundaries of acceptable and unacceptable behaviour and led to little confidence by staff (and possibly pupils) in what would happen if concerns were voiced.
- 8.37 After the appointment of the Executive Principal in 2012 the school is described by some staff as moving a culture dominated by compliance and a "tick box" approach to safeguarding. According to those staff this became particularly apparent after the abuse by Vahey came to light with a focus on policy and procedure development with little attention paid to the emotional impact of events. Whilst staff who contributed to this review recognise that the "old" culture needed more structures and processes, their view is that the pendulum swung too far in the other direction with management paying insufficient attention to relationships within the school. Managers at the time dispute this and the complexity of the picture is epitomised by a staff survey which noted only 43% of staff surveyed agreed that senior leaders knew about the day to day interactions between staff and pupils, whereas a review report by Deloitte in June 2015 described senior leadership teams as being visible around the schools showing warm interactions with staff, parents and pupils.
- 8.38 In response to the abuse by Vahey the overriding message as understood by the staff who contributed to this review was that it was time to "move on" and any further discussion or reflection on the way in which Vahey carried out his abuse was

discouraged. From the perspective of senior managers at the time this was an approach directed by the then Chair of the School Board. Whoever influenced the response, the immediate impact was that little time was given to managing the feelings associated with the traumatic nature of the events. This approach was confirmed by the CEOP³⁴ team working as part of the investigation which was asked not to mention Vahey's name in sessions they were conducting with pupils. It is also of note that very few staff wished to contribute to this review in March 2015 and when nine staff came forward later in the review process they said that they had only felt able to do so when the senior leadership team changed in September 2015. In March, they either did not feel encouraged to do so or did not wish to be seen to be talking to reviewers in the group session arranged at the school.

- 8.39 Working with child abuse is emotionally draining and a safe culture will be one where staff are supported to deal with difficult and sometimes traumatic situations. This was recognised in the recent Ofsted guidance for inspectors³⁵ which identifies the need for staff support and supervision as well as a positive ethos where safeguarding is an important part of everyday life. Within Southbank, it seems that staff did not receive the type of response to their emotional needs that enabled them to provide the right level of support for pupils. One staff member told the review that they have not been able to look directly at pupils who went on a residential trip with Vahey and it is evident that there is still a high level of distress in some members of the staff team two years after the abuse was discovered.
- 8.40 Whilst the day to day business of education must of course continue, keeping the safety and welfare of pupils at the heart of the school will be more likely in an organisation able to live with the discomfort associated with the abuse that took place and build positively on this through open debate and continual reflection on the way in which learning is being demonstrated day to day in the life of the school. Most importantly this approach will provide a basis for recognising any impact on the emotional wellbeing of pupils.

Has there been a change in safeguarding culture?

- 8.41 The Davies report and the interviews with the School Board Chair, Executive Principal and the senior management team were initially re-assuring about the changes that had been made. This included the change in the school's

³⁴ The Child Exploitation and Online Protection Centre (a Command of the National Crime Agency working together with child protection partners to identify threats to children and coordinate activity against such threats)

³⁵ Ofsted (2015) *Inspecting safeguarding in early years, education and skills settings*. Reference No. 150067 August 2015 Page 10-11

management in 2012 and the increased focus on safeguarding following the discovery of Vahey's crimes including engaging a risk management company to carry out school based audits of staff recruitment and vetting records.

8.42 Cognita as proprietors informed the serious case review that following the events at Southbank they had engaged Deloitte to review their safeguarding arrangements across the group. Initially this review focused on all schools other than Southbank and in May 2015 they carried out a review at all three campuses of Southbank School. The consolidated report does identify areas where further progress is needed with only 61% of staff feeling satisfied with the way a concern about a colleague was dealt with and only 57% feeling that senior leaders took seriously concerns raised by staff or pupils. This is in contrast to 73% believing that concerns raised by parents were taken seriously.

8.43 As a result of the review by Deloitte, Cognita have developed new governance arrangements for safeguarding aimed at ensuring that there is external audit and challenge. A letter to the review from Cognita explained that:

'Together with Cognita, the School's Board has been reforming the governance framework at Southbank, by creating an independent Southbank safeguarding committee led by an independent non-executive, which reports both to the school's board and also upwards, to Cognita's independently chaired European safeguarding committee. In turn this European safeguarding committee reports to the Group Board and to the Group's designated safeguard Director (the Chairman). This framework was designed in consultation with Deloitte's following the Hugh Davies QC report, to ensure that all aspects of safeguarding in the school, including the recruitment of school staff, is overseen and monitored by a dedicated and non-conflicted body. In addition to this, there will be an annual inspection (the proprietors audit) undertaken at Southbank on behalf of the board by a new Group safeguard audit function.'

We engaged Deloitte on 18-22 May 15 to provide a further independent safeguard audit of the school's policies and procedures – across all the sites - as the first of what will become the independent and annual safeguarding inspections. They will be running a workshop with all Principals and staff next term at the start of the new school year – Sep 15, to consider all aspects of their findings and to recommend strategies and action plans for transferring best practice, training and improvement.'

8.44 Changes in safeguarding practice will take time to become embedded within the system and the challenge for Cognita and the School Board is to move beyond structures and processes to cultural change. The unannounced Ofsted monitoring inspection that took place in June 2015 confirms that the independent school standards remained unmet in respect of safeguarding, communication and quality of leadership and management. Good progress has been made in relation to health and safety processes surrounding school trips. The report notes that *the School*

Board and proprietors have focused too narrowly on addressing the issues raised in the 2014 inspection and have not stood back to look at the overall safeguarding arrangements across the school.

- 8.45 Part of cultural change is to develop an open and transparent culture and the serious case review panel was concerned that the chance information from a parent at the end of June 2015, of the imminent departure of senior managers, indicated that this was not being demonstrated in the way that the school were engaging with the serious case review. The lead reviewers were not told by Cognita, the Chair of the School Board or the Executive Principal of these resignations although a letter had been sent to all parents about the imminent changes by the time the lead reviewers spoke to the Executive Principal in May 2015.
- 8.46 In response to a request for information from the serious case review chair, Cognita (in July 2015) explained the interim arrangements made at the end of the summer term to cover the departure of the Executive Principal and the Principal of the Westminster campus. This was at a time when the Chair of the School Board had also recently died.
- 8.47 The local authority designated officer³⁶ who has been providing advice to the school since the news of Vahey's abuse of children has expressed concerns about the willingness of the school to engage with the local authority. In a report to the serious case review she highlights the initial reluctance of the school to provide family contact details to the investigating team and to allow direct access to the pupils. In the subsequent fifteen months, the local authority designated officer remained concerned about the extent to which the school's management understood the change in culture required. The basis for this concern would appear to be confirmed as the local authority designated officer was not informed of any such developments, or of the involvement of Deloitte in advising on safeguarding policies and procedures.
- 8.48 The report by the local authority designated officer also cites the example of a recent situation where students reported inappropriate conduct by a member of staff and this was initially described as 'the over fertile minds of young boys'. It was also the case that these students waited some months before coming forward suggesting that at that time there was still a lack of openness in the school and lack of confidence in bringing forward concerns amongst pupils.

³⁶ *Working Together to Safeguard Children* 2015 required local authorities to have a designated officer or team of officers to be involved in the management and oversight of allegations against people that work with children.

- 8.49 The report from the local authority designated officer contrasts the response of Southbank school to that of another international school which following a serious incident regularly seeks advice from the local authority. This seems to indicate that Cognita and Southbank do not appear to understand the role of the LSCB with regard to safeguarding matters. The relationship between Local Safeguarding Children Boards and independent schools has recently been raised by another serious case review and this is an area which needs attention beyond this specific situation.³⁷
- 8.50 It is encouraging that the nine staff who spoke to this review have been positive about the changes at the school since September 2015 and believe that there is a move towards a more balanced culture providing the challenge, openness, trust and support required to promote effective safeguarding practice.

9. RELATIONSHIPS ACROSS THE SYSTEM

- 9.1 Southbank School is not a standalone institution; it sits within the Cognita group of schools and is also part of the international schools community. Any attempt to understand why the abuse by William Vahey went undetected for so long in so many different schools including Southbank needs to consider the whole system surrounding the abusive incidents. This section explores the relationships between the school and Cognita as the proprietors as well as the influence of and relationship with the community of international schools.

“Southbank is different”: Southbank School’s relationship with Cognita.

- 9.2 A consistent theme throughout interviews with Cognita staff was a view within the company that Southbank was “different” from other schools delivering the International Baccalaureate and therefore recruiting from a different pool for staff. This has made for an uneasy relationships with some Cognita head office staff and at times a lack of clarity in roles and responsibilities, particularly in relation to compliance. These uneasy relationships have permeated the system from the time that Cognita first acquired the school resulting in various solutions at different points in time from a fairly hands off approach in the early days through to tailor made governance arrangements. The difference was tacitly seen to extend to safeguarding until these events.
- 9.3 This difference has come about as a result of a combination of factors:

³⁷ Hampshire Safeguarding Children Board (2015) *The safeguarding implications of events leading to the closure of Stanbridge Earls School: a serious case review.*

- Southbank’s status as the first international school in the group, teaching a different curriculum
- a student and parent group who are perceived to be different from those in other schools in the group as a result of their mobility and high status,
- a high level of parental concern expressed about the motives of Cognita, culminating in media attention in 2011.

9.4 A very tangible difference between Southbank School and other Cognita schools is in the governance arrangements. Southbank is the only school with a School Board and a Chair reporting directly to the Chief Executive, rather than via the usual Cognita management structure. Moreover the School Board Chair initially was also the chair and founder of Cognita. Southbank therefore has a greater degree of autonomy than other schools owned by Cognita. The review was told by the Executive Principal that there was a blurring between executive and non-executive responsibilities because the Board Chair was more involved in the day to day management of the school than would be consistent with the Board's role in managing the strategic direction of the school.

9.5 The high level of parental involvement on the Board is potentially problematic as education expertise and knowledge of effective safeguarding practice are likely to reside in one or two Board members and most particularly in the Chair. It is therefore questionable how effectively the Board can scrutinise and challenge practice within the school and the role of Cognita staff in a quality assurance function has been marginal. This is explored further below. As described in section eight, new safeguarding structures are being developed across Cognita and it will be important to monitor how effectively they encompass oversight of safeguarding within Southbank to the same level as other schools in the group.

Quality assurance and challenge: the role of Cognita and the school board

9.6 This section describes the situation up until the new governance arrangements were introduced in 2015. It sets out the gaps in the system at the time that Vahey was employed at the school and provides a framework for considering whether new arrangements will be more secure.

9.7 The role of the School Board was (and is) clearly crucial in holding the principals of the individual campuses to account for their own standards of safeguarding. However, the Executive Principal (up to July 2015) and Chair of the Board (prior to his death) confirmed that safeguarding had not been on the agenda of the School Board and it is only since September 2014 that the Executive Principal has been required to provide a termly report on child protection. What will be crucial is

whether the Board in the future provides the degree of scrutiny necessary to make this a meaningful exercise. The most recent Ofsted inspection notes that the arrangements for the Executive Principal to report to the School Board lack independence as he is both a Board member and lead for safeguarding. The authors of this report would agree with that point of view and it will be important to evaluate how effective the new governance arrangements are in addressing this issue.

- 9.8 As outlined above, the Southbank School Board was described to this review as unusual compared to other independent schools as the majority of Board members do not have education experience. This does not necessarily preclude searching questions being asked about safeguarding practice but this review was informed that unlike boards of governors in maintained schools the School Board has not had any safeguarding training. This may inhibit their capacity to provide the level of scrutiny that is required and it has been notable that the School Board as a whole has had no involvement in the investigations relating to Vahey or this serious case review. All communication was with the Chair of the Board.
- 9.9 Interviews for this review described a process where a great deal of emphasis was placed on either the Executive Principal bringing issues to the attention of the Chair of the Board or individual staff members being encouraged to approach the Chair of the Board directly with any concerns. With the Cognita quality assurance team having an arm's length relationship with Southbank, there was a potential gap in the day to day scrutiny of safeguarding practice and no whistle blowing facility that was more independent and accessible. The Chair of the School Board told this review that there had been "no whisper" of Vahey's misdemeanours, yet we now know some staff had concerns confirming that this was a gap in the safeguarding system.
- 9.10 An interview with the (then) Chair of the School Board for the Davies review noted:
*'Cognita draws up school policies on regulation and compliance for its schools to individualise in terms of their local circumstances. The Head of HR and the Head of Compliance are responsible within Cognita for the policies utilised in different schools. Because Southbank has a school board, I would expect them to notify me if they had any concerns.....I expected that Cognita's compliance executive would give advice when asked and keep a supervisory role on what the executive are doing there.....In my position as chairman I had a double level of comfort. The Principal (Principal 1) was responsible for the running of the school but I also had the Cognita 'Quality Assurance' team. I think the Southbank board was in theory in a very good situation – it had a Principal and back up from Cognita.'*³⁸

³⁸ Interview with the chair of the school board for the Davies review

- 9.11 In fact, the member of staff responsible for quality assurance within Cognita is clear that her/his role with Southbank was very limited and essentially at the invitation of the Chair of the School Board. S/he also described some reluctance within Southbank School to utilise the advice from Cognita. These differing perceptions of roles may have been a misunderstanding but the end result was a situation where, apart from a brief input in 2012, there was little active involvement by the Cognita quality assurance team in Southbank.
- 9.12 Any remaining confusion about roles and responsibilities for the quality assurance of safeguarding practice between the School Board and Cognita needs to be ironed out. For example with the responsibility for trip approval now lying firmly with the Executive Principal, quality assurance in relation to this function needs to sit clearly with either the School Board or Cognita.
- 9.13 The issue of whether too much reliance is placed on staff reporting upwards without active scrutiny of potential gaps on the system is an issue noted in the latest Ofsted report which comments:
- 'It is not clear how any weaknesses in the system will be recognised and acted on to ensure that safeguarding arrangements are robust.....Leaders say that they are confident that staff at all levels will fulfil the safeguarding roles and that any reported concerns will be effectively managed. However, leaders place too much reliance on their confidence in staff that all concerns will be recognised and reported, consequently, while much has been put in place, the new systems are not robust enough to meet safeguarding requirements'.*
- 9.14 This would indicate the need for “double loop” learning³⁹ ; i.e. reflecting on the impact of the action taken and whether the action itself is enough to achieve the desired outcome. Staff may have been told to be vigilant and report concerns and received training but how will leaders know if this is having the desired effect? Are policies, procedures and training sufficient? Are there factors inhibiting desired outcome? These are important questions for the School Board and the senior leadership team particularly as over time and with staff turnover there is the challenge of maintaining the current level of awareness.

Southbank and the international school community

- 9.15 There are undoubtedly particular challenges in safeguarding children within an international school. By definition children and staff are likely to come from a wide range of jurisdictions where approaches to child protection may vary. This means not only the legislation, policies and procedures which may vary but attitudes and

³⁹ Munro, E (2010) *The Munro Review of Child Protection Part One: A Systems Analysis*. London: DFE
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values regarding expected behaviours may also differ. For example, one person linked to the school commented to the reviewers that American staff and families may be regarded as more 'straight laced' (particularly in relation to alcohol) whereas Europeans more inclined to cross boundaries. Parents may not always feel comfortable with the English context, for example when DBS checks for volunteers have been requested, comments have been made such as “we did not send our child to an international school to be British”. The review was told that generally there is an expectation from parents that international schools will be less formal and will have a family atmosphere, and the challenge is therefore meeting these positive expectations within a safe environment for children.

- 9.16 The PHSE curriculum can contribute positively to the safeguarding knowledge and culture within a school and here again there may be challenges in an international environment where some aspects of the curriculum may seem to parents to be counter to their beliefs and values.
- 9.17 In addition, members of staff in international schools tend to be highly mobile; fixed term contracts are common and by definition there is a high turnover of staff. Staff members are likely to have worked in a number of countries providing challenges in tracking the detail of previous convictions as outlined above (section 8.1-8.8).
- 9.18 Two bodies representing international schools, The Council for International Schools (CIS) and the Council of British International Schools (COBIS) are currently working towards embedding child protection into their accreditation arrangements. A senior leader within Cognita, a Principal of one of the Southbank School campuses and the Local Authority Designated Officer are working with the CIS safeguarding taskforce and contributing to the debate as well as feeding back to Cognita and Southbank. What is less clear is whether there are any links at all with British regulatory bodies.

10. REGULATION AND INSPECTION

- 10.1 The framework for regulation is set out in the appendices. This section addresses the significance of this framework in relation to Southbank School and the wider context of the independent education sector.
- 10.2 One important question is why two inspections, one by the Independent Schools Inspectorate (ISI) in 2010 and the second by the School Inspection Service (SIS) in 2013, failed to identify the concerns evidenced by Ofsted in 2014. The only safeguarding concern identified by previous inspections was in relation to recruitment practice in 2010 and this had been rectified by the time of the ISI final

visit. It is also of note that the inquiries carried out after the abuse came to light found additional concerns in relation to the record keeping of children's files, but these concerns were not identified in any of the earlier inspections.

- 10.3 Such contrast between inspection reports undertaken before and after the discovery of safeguarding problems raises questions about the overall reliability of inspections of safeguarding and the possible differences between inspection organisations. The potential issues associated with this have been acknowledged by central government and in 2014 the Secretary of State published criteria to underpin the work of inspectorates including the training of inspectors. Ofsted now has a statutory role in the quality assurance of inspections, sampling a proportion of inspectorate reports and Her Majesty's Chief inspector is required to write an annual letter to the Secretary of State giving views as to the quality of inspection by the independent inspectorates. There are therefore checks and balances in the system.
- 10.4 With regard to Southbank School the situation is complicated as there have been three different inspection organisations involved. It is not clear therefore whether the differences in outcome relate to the different organisations involved, the different inspectors or the focus of the inspection. One answer to the question as to why outcomes are different may be that the Ofsted inspection took place as a direct consequence of the knowledge of Vahey's abuse and the inspection therefore focused primarily on safeguarding practice. In contrast the inspections by ISI and SIS were general inspections required to consider all aspects of the Standards⁴⁰.
- 10.5 Effective inspections take time and SIS informed this review that they did not realise how many part time staff were employed at Southbank and as a result could only observe a proportion of the staff during the inspection. At that time they did not ask who was not in school and it is possible that Vahey could have absented himself at the time of the inspection. Also at that time the process of inspection included looking at newly appointed teachers' files and a sample of others. Now every file is reviewed.
- 10.6 The SIS inspection at Southbank in 2013 was described to this review as focused on educational standards. The Chair of the Board was concerned about standards of teaching and parental questionnaires were positive about the pastoral aspects of the school and more critical of the quality of education. This may have been a factor contributing to a failure of the inspection in picking up concerns later identified by Ofsted whose sole focus was safeguarding.

⁴⁰ The term "standards" refers the Independent Schools Standards, Working Together to Safeguard Children and Keeping Children Safe in Education.

- 10.7 Factors which potentially may limit the ability of inspectors to identify potential safeguarding vulnerabilities at a school are the expertise and training of the inspectors and the limited time allocated to the process with the onsite aspect of inspection being allocated two days. Getting to the heart of any unease amongst staff or pupils and really understanding the culture of the school in relation to safeguarding is difficult in the time allocated. In addition, independent school inspections are currently based on a 'standards' approach including an overall grading for the school and from 5th January 2015 these independent school standards increased in number from 7 to 33.
- 10.8 Independent schools pay for their own inspections and the authors explored whether this direct commissioning element could contribute towards the likelihood of a more positive inspection outcome. Both the SIS and the Ofsted staff seen as part of this review were clear that this is not a factor in inspection outcomes. However, the potential of variation across the system and the effectiveness of the various approaches in getting to the heart of the detail of safeguarding practice may need further consideration.

11. CONCLUSIONS

- 11.1 The abuse of pupils at Southbank School was carried out by an experienced perpetrator who exploited the inadequate safeguarding systems designed to protect pupils from harm. These systems were insufficiently robust on a number of levels and as a result Vahey was able to carry out the abuse undetected.
- 11.2 Within the school, safeguarding procedures were inadequate, the components of safe practice were poorly understood by staff with the lack of clear safeguarding structures and responsibilities providing opportunities for Vahey to assume an inappropriate level of power. At a School Board level there was insufficient scrutiny of safeguarding practice and this was compounded by the arm's length approach to the management of the school by the owners, Cognita. At a regulatory level, the inspections of Southbank by two separate organisations did not detect the deficiencies in safeguarding practice that have since become apparent, including poor record keeping and an inadequate understanding of the role of the designated safeguarding lead.
- 11.3 Parents and pupils should expect that schools ensure that safeguarding pupils from harm is central to all that they do. Specifically proprietors and school leaders should:

- have robust recruitment measures in place that comply with regulations and good practice. This should include asking searching questions at interview, making sure that references are sufficiently detailed in relation to child protection and undertaking all necessary background criminal record checks,
- make sure staff induction includes awareness of safeguarding systems within the school including the role of the designated child protection lead: within an international school it is particularly important that this includes expectations of child protection practice in England,
- ensure that all staff have training which enables them to recognise the way that sex offenders operate and that they are aware of how to report any concerns,
- make sure that pupils know how to recognise and report inappropriate behaviour by those in a position of trust and what they should expect when they report concerns,
- listen to staff and pupils who express any concerns about the behaviour of a member of staff (including managers) and make sure that there is an objective investigation of any concerns: this should include keeping records, consulting with the local authority designated officer and following up agreed actions,
- ensure that staff receive the emotional support and supervision necessary to assist them in working with pupils who have been abused or are at risk of harm,
- have governance arrangements in place which regularly review the effectiveness of their safeguarding system.

11.4 This review has found that Southbank School and its proprietors Cognita failed to meet these expectations during Vahey's time at the school.

11.5 The review has explored the implications of the international nature and status of Southbank and has concluded that there are additional challenges in implementing safe systems mainly due to the recruitment methods, high turnover of staff, likelihood of previous employment overseas and different cultural expectations regarding safeguarding practice. The existence of these challenges may be attractive to those wishing to abuse children. However this review has concluded that apart from dealing with the problem of obtaining overseas criminal record checks, no additional guidance is needed for international schools within England other than the need to reiterate the need to pay scrupulous attention to and understand the implementation of good safeguarding practice as set out in current statutory guidance.

11.6 Perpetrators of sexual offending in organisations have described a reduced likelihood of abuse taking place where organisational messages and rules are clear and consistent and the organisational culture is directly focused on the needs of the children (Erooga⁴¹). This chimes with the following description of features of a safe organisational culture which have been used as a basis for developing the following findings and recommendations of this review:

- an explicit safeguarding culture and ethos with values and behaviours which are both articulated and lived at each level of the organisation,
- clear policies and procedures which make it clear to staff what is expected of them and facilitate the raising of concerns,
- courageous management who are prepared to act appropriately on concerns and staff who are prepared to challenge and raise concerns,
- children and young people having a voice and mechanisms for raising their concerns which are taken seriously.

11.7 Whilst Southbank School has started on the journey towards an organisational culture focused on the safeguarding needs of its children, it remains early days. The three inspections by Ofsted identify continuing work to be undertaken and there is now the need for a stable management team who can work positively with the staff. Given that the current arrangements are temporary, the school is likely to require a great deal of support in the immediate future.

12. FINDINGS AND RECOMMENDATIONS

Finding 1: During the time that Vahey was at the school Cognita did not discharge their safeguarding responsibilities as proprietor.

12.1 Cognita as proprietors of Southbank School are ultimately responsible for the safety and wellbeing of pupils and the review found that during the period that Vahey worked there they did not sufficiently scrutinise safeguarding practice at the school. There was an overreliance on the chair of the School Board and the Board as a whole, but they did not provide the necessary scrutiny and quality assurance in relation to safeguarding practice. Since these events Cognita have taken steps to strengthen the governance structures for safeguarding and worked with external

⁴¹ Erooga, M (2012) 'Understanding and responding to people who sexually abuse children whilst employed in positions of trust: an overview of the relevant literature-part two: organisations.' in Erooga, M (ed) *Creating Safer Organisations* Chichester: Wiley

consultants to assist them in this task. The effectiveness of these arrangements has yet to be fully tested.

Recommendation 1

In order to fulfil the responsibilities of governing bodies, management committees and proprietors set out in Working Together to Safeguard Children (2015) and Keeping Children Safe in Education (2015) Cognita and Southbank School must ensure that the recent changes made by Cognita to the governance of safeguarding arrangements deliver the improvements required. As part of this process Cognita and Southbank School should:

- provide training for all Board members to ensure that the board is actively engaged in scrutinising and challenging the quality of safeguarding practice within the school,
- provide/publicise a Cognita whistle blowing process for pupils, parents and staff which is independent of the school
- provide a mechanism for feedback from pupils, parents and staff on their ability to raise concerns.

Finding 2: The culture at Southbank did not support or enable good safeguarding arrangements

- 12.2 From 2009-2013 Southbank School left pupils vulnerable to abuse by a prolific sex offender and there were failures at every level to prevent such criminal offending taking place. Vahey's abuse took place within a predominantly informal culture where it appears the underlying belief was that abuse would not happen within that community. This relaxed environment enabled him, from the moment he joined the school, to assume an inappropriate level of power, particularly in relation to overseas trips. Through this he was able to normalise his unusual behaviour so as to access individual children on trips. Although some colleagues felt uncomfortable about some of his ways of operating both within and outside of the classroom, the culture did not facilitate the expression of such doubts or provide reliable ways for them to be reported and investigated.
- 12.3 A new management style from 2012 focused on compliance, but also failed to identify the risks posed by Vahey. Since that time there have been significant

changes in child protection policies, procedures and practices within the school but there remains a need to ensure that a balance is maintained between informality on the one hand and a formalised compliance driven approach on the other. The latter may contribute to a defensive closed organisation and serve to silence staff and pupils.

- 12.4 Safeguarding and protecting pupils from harm needs to be integrated into all aspects of the life and culture of the school. The challenge will be to sustain and embed such cultural changes over time, especially in the context of a high turn-over in staff, pupils and parents, associated with the international nature of the school.

Recommendation 2

Cognita must work with Southbank School to build on recent cultural change, learning from what went wrong and make explicit to staff, parents and students the requirements of a safeguarding culture.

Finding 3: Cognita and the management team at Southbank School did not manage the trauma associated with events surrounding the abuse by Vahey in a way which provided the emotional support that staff needed to enable them to support pupils through the process.

- 12.5 Revelations about abuse by Vahey focused on short term counselling support for staff and pupils and did not pay sufficient attention to the longer term impact within the school community. It seems that the message from management (under direction from the Chair of the School Board) was interpreted as a need to move forward without acknowledging that pupils and staff may need support with the emotional impact over time. Access to the short term counselling arrangements was not well thought through by management and staff who did not feel comfortable accessing a service next to a classroom within the school building.
- 12.6 Recently published guidance for Ofsted inspectors⁴² highlights the need for effective staff support and supervision arrangements. Where these are in place, a school will be better placed to manage both day to day safeguarding as well as any traumatic events such as the situation at Southbank.

⁴² Ofsted (2015) *Inspecting Safeguarding in Early Years, Education and Skills Settings*

Recommendation 3

Cognita and Southbank School should review arrangements for staff support and supervision and ensure that this takes account of the Ofsted guidance for inspectors set out in *Inspecting safeguarding in early years, education and skills settings* (August 2015)

Finding 4: Staff at Southbank School had received insufficient training to enable them to identify potential modus operandi of sex offenders. This is likely to be an issue across the wider children's workforce

- 12.7 Although some staff and pupils had concerns about William Vahey's wholly inappropriate behaviour this was not always recognised as symptomatic of an adult who posed a risk to children.

Recommendation 4

The Department for Education should be asked to revise the training requirement within *Keeping Children Safe in Education (2015)* to include training on the modus operandi of sex offenders and consideration should be given as to how to encourage such an approach across the wider children's workforce.

Finding 5: Safeguarding arrangements within Southbank were not in line with best practice or compliant with statutory guidance.

- 12.8 Safeguarding concerns and worries about William Vahey's behaviour were rarely discussed and reported to safeguarding leads, a problem exacerbated by the absence of a single point of contact in the school responsible for dealing with such issues. When reports were made they were rarely recorded in sufficient detail to enable a pattern of accumulating concerns to be established and acted upon. This lack of specific detail was particularly relevant at the point of handover from one Principal to another.

Recommendation 5

Southbank School should demonstrate to Cognita through the recently established internal auditing and reporting arrangements that safeguarding practice is

compliant with statutory guidance particularly in relation to the reporting and recording of concerns.

Finding 6: The role and capacity of the Safeguarding Children Board in ensuring compliance is not sufficiently clear.

- 12.9 Other independent schools within the Borough have worked with the Local Authority and Safeguarding Children Board in order to develop best practice. Southbank may have benefited from such a closer working relationship with the Local Authority and the Safeguarding Children Board. In addition the Safeguarding Children Board needs a clearer remit in relation to independent schools and this issue has been identified in another recent serious case review involving an independent school elsewhere⁴³.

Recommendation 6a

Cognita should ensure that all its schools within England and Wales have a link with their Local Safeguarding Children Board.

Recommendation 6b

Hammersmith and Fulham, Kensington and Chelsea and Westminster Safeguarding Children Board should highlight to the Department for Education the similarities between this review and concerns raised by Hampshire Safeguarding Children Board in response to events at Stanbridge Earls School. These relate to the challenges faced by LSCBs when trying to engage with and monitor the safeguarding of children in independent school settings.

Finding 7: Very few pupils at Southbank raised concerns about Vahey's behaviour; which may be linked to the method employed at the time to resolve complaints

⁴³ Hampshire LSCB (2015) The safeguarding implications of events leading to the closure of Stanbridge Earls school

It is not clear how worried individual pupils were about Vahey's behaviour. One factor that may have inhibited disclosure prior to 2012 was the management practice at the point of a complaint about staff behaviour of bringing the complainant and member of staff together for a three way discussion. This was flawed and was likely to prevent pupils and staff from reporting, and such three way discussions may be more suited to resolving differences between peers, as opposed to responding to concerns by pupils. There are likely to have been other factors which prevented pupils in raising concerns but it has not been possible to explore these as young people have not felt able to contribute to the review at this time. It will be important that this is kept under review.

Recommendation 7

Cognita should provide assurance to the Safeguarding Children Board that there are no barriers to pupils reporting worries about the behaviour of members of staff or other pupils. This assurance should include evidence that pupils are confident that they will not feel blamed or awkward about making a complaint.

Finding 8: International arrangements on background checks of employees did not alert Southbank to Vahey's previous conviction in the USA

- 12.10 Criminal record checks were not made with all countries where Vahey had worked and checks with the USA might have revealed a previous conviction. Schools are hampered in carrying out checks by difficulties in obtaining information from some jurisdictions. Recommendation one of the Davies review regarding mandatory checks for each country in which the applicant has lived or worked is important in improving the safety of children in all schools and the wider children's workforce. This will be impossible to implement fully in the near future as there is no current work on how this can be achieved at a governmental level although the work of the Council for International Schools and a pilot within the European Union in respect of access to criminal record information may help future developments.

Recommendation 8

The Local Safeguarding Children Board should formally request that the Department for Education and Home Office work together to develop a workable solution to obtaining relevant background checks where staff have worked overseas.

Finding 9: Safeguarding and Child Protection guidance does not adequately address abuse by adults working with children

- 12.11 Statutory safeguarding and child protection guidance and associated training has a heavy emphasis on abuse within the family; additional emphasis is needed on abuse in other settings.

Recommendation 9

The Department for Education should consider whether the balance within current statutory guidance is right between familial abuse and institutional abuse and whether there is a need to strengthen the guidance in respect of recognition, reporting and responses to abuse of young people by persons in a position of trust.

Finding 10: Arrangements surrounding school trips did not adequately safeguard pupils from harm.

- 12.12 The arrangements for school trips including selection of pupils, agreeing staff ratios recording of any illnesses or other concerns and debrief at the end of each trip did not adequately safeguard pupils from harm. Neither the current statutory child protection guidance nor the Independent School Standards include any reference to safeguarding pupils on school trips.

Recommendation 10

The Department for Education should consider including guidance relating to the safe conduct of school trips within Keeping Children Safe in Education. This guidance should move beyond a focus on health and safety to good practice in keeping pupils safe from abuse by persons in a position of trust.

Finding 11: Training for teachers to assist the recognition of abuse within organisations is insufficient.

- 12.13 The review panel were informed that current training for teachers does not provide the required emphasis on the modus operandi of sex offenders and recognising potential abuse by adults within school settings.

Recommendation 11

The Department for Education should ask those bodies responsible for the delivery of initial teacher training to ensure that the content includes the modus operandi of sex offenders, so as to assist in the recognition of and response to potential abuse by adults within school settings.

Implementing learning from this review

- 12.14 Working Together to Safeguard Children (2015) requires Local Safeguarding Children Boards to oversee the process of agreeing with partners what action they need to take in the light of the SCR's findings.

Recommendation 12

The Local Safeguarding Children Board should oversee all actions relating to practice at Southbank School. To this end the Safeguarding and Quality Assurance team should work with Cognita, as the proprietors, to:

- Agree the actions that will be taken to implement the recommendations of this review
- Confirm how these will be monitored
- Review progress and report back to the Local Safeguarding Children Board in 12 months from the date this report was accepted by the Board.

In respect of national recommendations the LSCB will ask the relevant Government department for feedback on actions taken.

13. APPENDIX 1 - HISTORY AND STRUCTURE OF SOUTHBANK SCHOOL TO END JULY 2015

13.1 The following is a brief chronology of the history and structure of Southbank School. The remainder of the appendix provides a more detailed consideration of the structure of Southbank School and its relationship with the current owners, Cognita.

	Southbank School	Cognita
1979	Southbank School founded as the American International School and subsequently set up on two campuses in Kensington and Hampstead.	
2000	Southbank was the first school in the UK to be authorised to offer all three International Baccalaureate programmes covering the primary years (ages 3-12), middle years (ages 11-16) and the Diploma (ages 16-18).	
2003	The Westminster campus opened, catering for pupils age 11-18. The remaining two campuses focused on primary age pupils.	
2004	The school was run by a School Board consisting of the Head Teacher (who had responsibility for all three campuses), the Head of the Hampstead campus and Director of Finance.	Cognita was formed by a private equity firm and an ex-Chief Inspector of schools who became the Chair of the organisation. Cognita began an extensive acquisition programme and bought a number of schools in the UK.
2006	Southbank School was acquired by Cognita; the first international school owned by the group.	
2007	The Head Teacher resigned and the responsibility for running the school across all three campuses was taken on by the education board. The first Chair of the Board was the Principal of the Westminster campus.	
2009	The Principal of the Westminster campus stood down as Chair of the Education Board to prepare for the forthcoming inspection. The Director of Admissions took over as Board Chair.	

2010-2011	Disquiet amongst a group of parents who accused Cognita of “milking profits.” ⁴⁴ Cognita denied the allegations and the Chair of Cognita worked with the parents group to establish a positive working relationship.	
2012	The Education Board disbanded and a School Board established with far greater parental involvement in the running of the school. The chair of Cognita became Chair of the School Board. The overall strategic direction of the school became the responsibility of the School Board.	The chair of Cognita persuaded Cognita’s investors to commit to a five year plan and investment in a new site for Southbank. Cognita retained (and retains) the power to set the school budget with the board agreeing how this budget should be utilised.
2012	Decision by School Board to use the School Inspection Service (SIS) rather than the Independent School Inspectorate (ISI) who had previously inspected the school.	
Spring 2012	The Chair of the School Board secured the agreement from the then Principal (Principal 1) to leave at the end of the academic year.	The beginning of a number of changes within Cognita head office including a new Director of Education and the appointment of the Head of Education Compliance.
August 2012	The Executive Principal replaced Principal 1. The Executive Principal had responsibility for the Westminster campus and overall management responsibility for all three sites.	
2013	The Chair of Cognita resigned from his post within Cognita but remained Chair of the Southbank School Board.	
September 2013	It was agreed that the role of Executive Principal was too wide and a Principal for Westminster campus was appointed. (Principal 2).	

Management structures, governance arrangements and the history of the relationship between Southbank School and Cognita.

- 13.2 The relationship between Cognita and Southbank school is perhaps most clearly summed up by a member of Cognita staff who described it to the reviewers as “a *standalone school under the umbrella of Cognita*”. This “difference” or special status within the group was a recurrent theme through interviews for this review. From the start the (then) Chair of Cognita is described as taking a special interest in

⁴⁴<http://www.theguardian.com/education/2011/apr/10/private-firm-profits-free-schools>

Southbank, although prior to 2011 when parents raised concerns about Cognita's role and intentions, Cognita staff describe the focus from the Chair as mainly on communication and PR strategies, rather than on the quality of education delivered by the school. This is consistent with further information from Cognita staff which identified that in the early days of Cognita, governance of schools across the whole group was not as tight as it is now and there was less consistency regarding such issues as recruitment practices.

13.3 At the point that Cognita purchased the school, the school was run by a School Board and the senior management team which was responsible for day to day management and consisted of the Principal, Director of Finance, the three campus Principals, the Director of Admissions and the Director of Marketing.

13.4 Following the acquisition by Cognita, in 2007 the Head Teacher resigned, this post was abolished and the overall responsibility for the running of the school across all three campuses was taken on by the Education Board. Members of the Education Board were:

- Executive Director (former Director of Finance)
- Westminster Principal (Education Board Chair until 2009)
- Hampstead Principal
- Kensington Principal
- Admissions Director
- Head of Communications
- Executive Administrator
- Cognita representative.

13.5 The main responsibilities of the Education Board were set out as:

- The mission statement and the core values of the whole school
- The school's long term development plans
- The school's academic programme
- All policy matters

13.6 The Davies review points out that:

'The overlap between the memberships of the Education Board and SMT⁴⁵ is accordingly obvious ... As can be seen, although in principle the responsibilities of the Education Board extended to evaluation of the management structure and the performance of senior academic and administrative staff, the high degree of overlap with members of the SMT produced the result that people were effectively policing themselves' (paragraph 3.15).

⁴⁵ The SMT is the Senior Management Team of the school.

13.7 In February/March 2010 the school was inspected by the Independent Schools Inspectorate (ISI) and staff interviews⁴⁶ describe considerable activity including the writing of policies and procedures prior to this inspection. It was due to a wish to concentrate on preparing for this inspection that the Principal of the Westminster campus stood down as Education Board Chair in 2009.

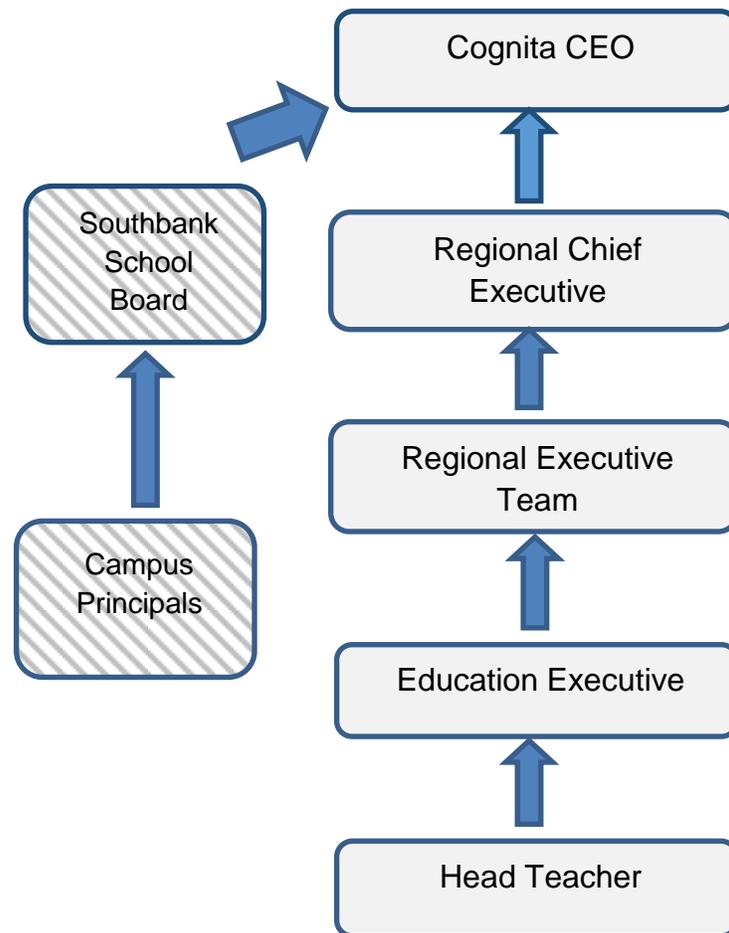
The school board and its relationship with Cognita

13.8 The School Board was formed in the wake of the parental unrest in 2011 and is unique among the Cognita group. All other head teachers of schools owned by Cognita report to an Education Executive within head office who in turn reports to the regional executive team which includes the director of education. This regional executive team reports to the regional Chief Executive who is responsible to the Chief Executive Officer (CEO).

13.9 In the case of Southbank, each campus is managed by its own individual Principal and senior management team with the Executive Principal having responsibility for all three campuses. The Executive Principal meets regularly with a senior leadership team in order to manage Southbank as a whole.

13.10 The Executive Principal reports to the School Board. The Chair of the School Board retains a great deal of autonomy within Cognita reporting directly to the Chief Executive Officer.

⁴⁶ Interviews with the Metropolitan Police – viewed by this review team.



13.11 The Southbank School Board has a high level of parental involvement and consists of:

- Chairperson – appointed by Cognita
- Two Cognita representatives
- The Executive Principal
- Three elected parent representatives
- Three co-opted parent representatives

13.12 The School Board sets the overall strategic development and direction of the school and the financial constraints within which the school management team works. Cognita have ultimate responsibility for decisions on fees and major capital investment. These decisions are taken in the light of advice offered by the Board.

13.13 The School Board meets about twice a term. According to the (then) Chair there was no need for discussion about compliance at the initial Board meetings⁴⁷ which were more concerned with other issues such as performance pay and the appraisal system. However the Chair of the Board commented in interview for the Davies review:

'The Board monitors the performance of the school and its senior management team rigorously via several mechanisms. For example, it commissioned a questionnaire for feedback from parents. We also look for student's views. We expect reports on the results of appraisals and have asked [the executive] to categorise teachers into four levels – 'outstanding', 'good', 'satisfactory' and 'incompetent'. We expect teachers in the last group to leave the school'.

13.14 It was one of the feedback questionnaires that rated William Vahey the second most popular teacher in the school: this highlights the extreme challenges in identifying those teachers who are intent in using their popularity, power and influence as a smokescreen for their abusive activities.

Compliance: the role of Cognita

13.15 In 2012, the Head of Education Compliance for Cognita was appointed and was originally told that although the job role was a national one, Southbank was *not* included as different arrangements were in place for that particular school. However, just prior to the first inspection by SIS in April – May 2013 the Head of Education compliance was asked by the Cognita Chair to become involved in supporting the school in preparing for the forthcoming inspection. After this piece of work was complete the Head of Education compliance within Cognita had no further role with Southbank School.

13.16 The “different” place of Southbank School within the Cognita structure has therefore set the school outside the usual compliance and management structures. For example, it was announced at a UK compliance committee meeting that Southbank would be setting up their own process for risk assessments. Another example of difference was that Cognita head office staff would in all other situations be expected to manage directly complaints about head teachers but in the case of Southbank they would need to ask permission of the Chair of the School Board to instigate the complaints process.

13.17 At Cognita there are seven education executives who meet together on a regular basis - Southbank was previously not represented at this meeting due to the

⁴⁷ Interview with school board chair for Davies review

different arrangements. Prior to the abuse by Vahey coming to light the Education Executives group did not have safeguarding within their brief, however this has now changed and the Group General Counsel who is a main Cognita Board member now has a companywide brief including the quality assurance of safeguarding practice. In partnership with Deloitte's new safeguarding governance arrangements have been developed across the group and these include Southbank School.

- 13.18 As far as Southbank School is concerned staff recruitment is managed directly by the school with the responsible manager sitting on Cognita's HR leaders' forum. General HR support to other schools in the group is provided from the HR team at Cognita; Southbank support comes from a freelance HR consultant who provides ten hours support per month directly to the school. This arrangement has developed because of the perceived need for greater flexibility where Southbank is concerned. The staff group at Southbank are mainly teachers from the international school community who are seen to need a higher level of HR support than staff at UK based schools as they generally have experience in a number of different schools and are more questioning of HR processes.

14. APPENDIX 2 - HISTORY OF REGULATION AND INSPECTION AT SOUTHBANK SCHOOL

14.1 As an independent school, Southbank must be registered by the Secretary of State and comply with The Education (Independent School Standards) (England) regulations⁴⁸. These regulations contain a set of standards which form the basis of each inspection. School inspectorates carrying out inspections in the independent sector must be approved by the Secretary of State and the three organisations with this approval are:

- Independent Schools Inspectorate (ISI) – for schools in membership of the Associations that make up the Independent Schools Council,
- School Inspection Service (SIS) – for Cognita group schools, schools affiliated to the Focus Learning Trust, schools accredited as members of the Steiner Waldorf Schools Fellowship,
- Ofsted – who can directly inspect any independent school that wishes to use them and inspects all schools not inspected by ISI/SIS/BSI. Ofsted also performs a quality assurance role on behalf of the Secretary of State in examining a proportion of reports produced by the other inspectorates. The Secretary of State can also instruct Ofsted to inspect any school at any time.

14.2 Southbank School was previously inspected by ISI but in 2012 the decision was made by the school board to use SIS. It is understood by some contributors to this review that this decision was part of a move to have a more rigorous approach to educational standards, with SIS exclusively using ex HMI Inspectors.

14.3 The following summary sets out the inspections that have taken place during the timeframe for this review and their findings insofar as they are relevant to the terms of reference for this review.

⁴⁸ The relevant regulations during the period of this review had been published in 2003 and revised in 2010 (coming into force in January 2013).

Date	Inspectorate	Findings relevant to this review
Feb. - March 2010	Independent Schools Inspectorate (ISI)	<p>Inspection of all three campuses.</p> <p>The teaching at the Westminster campus was described as excellent as was the pastoral care. Staff were noted to have received appropriate safeguarding training and students felt safe and valued by staff</p> <p>At the time of the February inspection in all three campuses some aspects of staff recruitment were not completed properly. Staff had been appointed without an enhanced criminal record or list 99 check although by the time of the final visit in March the school was described as having rectified all the shortcomings in relation to staff recruitment.</p> <p>The quality of governance at Westminster was described as satisfactory and the report noted that there <i>'is currently no direct involvement by representatives of Cognita with the staff, students or pupils and there are currently no arrangements for monitoring the effectiveness of the education board itself'</i>.</p> <p>There were only two recommended actions for the Westminster campus relating to the development of the role of heads of department in the management and monitoring of staff and providing further training in the use of interactive whiteboards.</p>
April 2013	School Inspection Service (SIS)	<p>Inspection of all three campuses.</p> <p>The quality of the curriculum and teaching was described as good and students' spiritual, moral, social and cultural development as excellent. Also excellent was the provision for welfare and health and safety of the students. The report notes: <i>'the designated Child Protection Officers are wholly committed to their roles, and ensure that students are aware of ready sources of support. They ensure that all staff are trained in their responsibilities'</i>.</p> <p>In relation to safer recruitment the report comments that: <i>'the required checks relating to the suitability of staff, supply staff and proprietors are undertaken and the school maintains careful records of these matters. A single central register of all the checks undertaken meets requirements'</i>.</p>

		<p>The report noted that organisationally the school was in a state of transition and the recently appointed Executive Principal was <i>'committed to implementing the board's determination to raise standards of education even further, while maintaining the strong ethos and high levels of care and support for the pupils'</i>.</p> <p>There is no comment on the overall quality of governance or links with Cognita.</p>
May 2014	Emergency inspection by Ofsted commissioned by the Department for Education	<p>This inspection concluded that the school's arrangements for safeguarding students were not sufficiently robust. The main issues identified were:</p> <ul style="list-style-type: none"> • the insufficient status and authority of the designated safeguarding leads to influence safeguarding policy and practice • lack of awareness of the safeguarding needs in respect of <i>Keeping Children Safe in Education</i> and lack of involvement with the senior leadership team and Cognita in reviewing the school's child protection policies • the inappropriateness of the term "unofficial visits" in the policy on school trips which could be open to misinterpretation and at odds with the safeguarding policy which states that staff and pupils should not meet outside school hours.
Oct. 2014	Ofsted progress monitoring inspection	<p>This noted the significant number of actions taken by the school to tackle the failings identified in the May 2014 inspection and that leaders at all levels were monitoring that actions were being implemented by staff. However the inspection found that <i>'independent school standards that relate to pupils' safeguarding, welfare, health and safety remain unmet'</i>.</p> <p>A core issue concerning inspectors at this point was <i>'how weaknesses in the system will be recognised and acted on to ensure that safeguarding arrangements are robust...However leaders place too much reliance on their confidence in staff that all concerns will be recognised and reported. Consequently while much has been put in place, the new systems are not</i></p>

		<i>robust enough to meet safeguarding requirements'.</i>
June 2015	Ofsted unannounced progress monitoring inspection	<p>This found that the independent schools standards were not met in respect of safeguarding, communication and quality of leadership and management.</p> <p><i>The schools leaders, which include the school board and proprietors, have focused too narrowly on addressing the issues raised in the October 2014 inspection. They have not fully implemented their action plan and firmly established systems for monitoring the effectiveness of safeguarding.</i></p>

15. APPENDIX 3 – TERMS OF REFERENCE

Hammersmith and Fulham, Kensington and Chelsea and Westminster

Local Safeguarding Children's Board

Serious Case Review – Southbank School

- 15.1 Working Together 2013 requires the LSCB to consider initiating a Serious Case Review where (a) abuse or neglect of a child is known or suspected; and (b) either — (i) the child has died; or (ii) the child has been seriously harmed and there is cause for concern as to the way in which the authority, their Board partners or other relevant persons have worked together to safeguard the child.
- 15.2 The LSCB has given careful consideration to the timing of this Serious Case Review, having to balance the fact that there is an ongoing Police investigation with the need to carry out the review and ensure that lessons are learned at the earliest possible opportunity. The LSCB has therefore liaised closely with the Police and the Strategic Management Group overseeing the ongoing investigation, and has determined that the SCR should be initiated as soon as there is sufficient confidence that the Terms of Reference for the review and the key lines of enquiry are very unlikely to be substantially or significantly altered due to new information emerging.
- 15.3 The LSCB's Case Review Sub-group met on 4th September 2014 and recommended that a Serious Case Review be initiated in respect of the sexual abuse perpetrated by William Vahey during his period of employment at Southbank International School in Westminster between 2009 and 2013. The Independent Chair of the Tri-borough LSCB subsequently endorsed this recommendation and initiated this Serious Case Review.
- 15.4 Early in 2014 allegations of sexual abuse perpetrated by an American citizen, William Vahey, were made in Nicaragua, in his capacity as a teacher at the American School in Managua. As investigations were initiated in Nicaragua and the USA, William Vahey committed suicide in March 2014. Following a formal referral by the FBI to the Police in London, Westminster Children's Services commenced a Complex Child Abuse Investigation jointly with the Metropolitan Police in May 2014.
- 15.5 This Complex Child Abuse Investigation has been pursued in accordance with the pan-London Safeguarding Procedures, overseen by a Strategic Management Group chaired by the Director of Family Services for Westminster City Council, and driven by an Investigation Management Group chaired by a DCI of the Metropolitan Police.

- 15.6 The Serious Case Review will need to take account of these ongoing investigations in close liaison with the Police and the Strategic Management Group.
- 15.7 Lines of Enquiry
- 15.8 The Serious Case Review is directed to follow a number of lines of enquiry, with a view to reaching conclusions and making recommendations to the Tri-borough LSCB.
- 15.9 For each question the Review will need to consider the extent to which lessons are relevant to Southbank International School, all International Schools, all Independent Schools, all schools and/or broader lessons for all organisations working with children.

Safe Recruitment

1. Was a proper safe recruitment process followed by Southbank International School in recruiting William Vahey?
2. Is the current guidance on safe recruitment checks that should be carried out internationally sufficiently robust? Is the guidance effective in that it can be practically carried out?
3. Are there any specific lessons to be learned in respect of safe recruitment practice carried out by Southbank International School, by independent schools or by international schools more generally?

Effective Safeguarding

4. Were there any opportunities to identify the risk posed by William Vahey during or after his period of employment at Southbank International School?
5. If there were such opportunities, were appropriate actions taken by staff at the time? And if not, why not?
6. Is there any evidence that any referral of concern about William Vahey was passed on to any other agency? And if so, were appropriate actions taken at the time? And if not, why not?
7. Were there sufficient safeguards around school trips?
8. Was there sufficient clarity about when Vahey was carrying out activities (including trips and tutoring) as a member of staff and when he was acting on his own initiative?
9. What steps might strengthen safeguarding at Southbank International School?
10. Are there other steps that might strengthen multi-agency safeguarding in relation to independent schools?

11. How well engaged are Southbank International School and other independent schools in the work of the LSCB?
12. How did the governance arrangements at the school establish, promote and maintain sound safeguarding practice? Were there any factors inhibiting the effectiveness of these arrangements?

Case Review Group Questions

13. Please provide an analysis of the role that the culture of the school environment played in enabling the abuse to take place.
14. What support was available to the school from the LSCB to support them in their Safeguarding responsibilities?

Structure of Review

- 15.10 The Serious Case Review will be overseen by a Panel, which will direct the activities of the review authors, and will finalise the conclusions and recommendations of the final report.
- 15.11 The review will have a single primary author, who will determine the exact nature of the evidence that she will require and how this should be collated. This determination will include:
 - Evidence from the Metropolitan Police
 - Evidence from Westminster Children's Services
 - Evidence from the FBI
 - Evidence from Southbank International School and their commissioned review being led by Hugh Davies
 - Any relevant evidence from health services
 - Options for interviewing staff from these agencies
- 15.12 The review will need to determine what opportunities it offers children, parents and professionals to contribute to the review directly. This will include consideration of how best to communicate the findings of the review.

16. APPENDIX 4 - THE REVIEW PROCESS

16.1 A panel was appointed to oversee the review process chaired by Dame Moira Gibb. Members of the panel were:

- Former chair of the Independent Safeguarding Authority
- Director of Family Services, Westminster City Council
- The Tri Borough Safeguarding and Child Protection Schools and Education Officer
- The Tri Borough Safe Organisations Manager and LADO (Local Authority Designated Officer)
- The Tri Borough Joint Head of Safeguarding, Review and Quality Assurance
- Associate Director for Safeguarding, CWHHE
- Detective Chief Inspector, Metropolitan Police Child Abuse Investigation Team
- The Tri Borough Safeguarding Children Board Manager

16.2 Two lead reviewers, Jane Wonnacott and Edi Carmi were appointed to gather and analyse material relevant to the agreed lines of enquiry and produce this final written report. They were full members of the panel and attended all meetings.

16.3 Jane Wonnacott, Director of In-Trac Training and Consultancy, qualified as a social worker in 1979, and has been working independently for 21 years. She holds the Advanced Award in Social Work and an MPhil following research into the impact of staff supervision on outcomes for children. She has developed government funded national training programmes for supervisors and is the author of two books on supervision. Jane has been the lead author for over 70 numerous serious case reviews, and has a particular interest in abuse by staff in organisations as a result of carrying out the serious case review into events at Little Teds nursery in Plymouth where Vanessa George abused a number of children, and more recently the review into sexual abuse in a Birmingham nursery.

16.4 Edi Carmi, qualified as a social worker in 1978 and after a career as a practitioner and manager in both statutory and voluntary sectors, has worked independently for 15 years. During that time she has focused primarily on the safeguarding of children, undertaking serious case reviews as well as writing policy and procedure. She was the lead author of the first pan London child protection procedures, as well as the procedures throughout the South East. Since 2009 she has been working with the Social Care Institute for Excellence (SCIE) in the development and implementation of the Learning Together methodology for learning from practice. She has considerable experience on learning from reviews where there are multiple victims, involving both historical abuse and current practice; this has included reviews into cases of child sexual exploitation, child on child abuse, the early deaths

of 13 care leavers and the abuse of children within adopted families. She has a particular interest in institutional abuse and was the author of a report for the Diocese of Chichester, subsequently known and published in 2014 as the 'Carmi' report, into the abuse of choristers

- 16.5 The full terms of reference for the review are set out in appendix three.
- 16.6 The following is an overview of the activities carried out in order to produce this review report. Specific details of individuals who contributed to the review have not been included in order to preserve anonymity. The process involved:
- reading the Davies review reports and associated documentation,
 - discussion with the Metropolitan Police and review of information gathered during the course of their enquiries,
 - discussion with the joint police, social work and CEOP team who undertook the enquiries into the abuse perpetrated by William Vahey at Southbank School,
 - initial meetings with staff from Southbank School in March 2015,
 - discussions with those parents who wished to contribute to the review,
 - meetings with staff from Cognita, the owners of Southbank School,
 - telephone discussion with the (then) chair of the school board,
 - meetings with government officials and Ofsted staff responsible for regulation and inspection of independent schools including Southbank,
 - further meetings with school staff in October 2015 following a direct approach to the review from nine staff who had felt unable to contribute to the review earlier due to either lack of awareness of the opportunity or concerns about how their involvement would be interpreted by previous managers within the school.
- 16.7 Very few parents wished to contribute to the review and similarly, although pupils at Southbank school were sent a letter via their parents offering them an opportunity to contribute to the review, none responded. Whilst we cannot be certain why this was, it does highlight the challenge of finding ways to engage sensitively and appropriately with people affected by sexual abuse in order to understand more fully both the circumstances surrounding the abuse and its impact.
- 16.8 A final draft of the report was agreed by the serious case review subcommittee of the Local Safeguarding Children Board and then shared with representatives from organisations who contributed to the review in order to check factual accuracy.
- 16.9 The final recommendations were agreed by the full Local Safeguarding Children Board prior to publication.

