

# G.E.M Hereford

Trinity House, 31 Barricombe Drive, Hereford HR4 0NU

**Inspection date**

28 June 2023

**Overall outcome**

**The school is likely to meet all the independent school standards when it opens**

## Main inspection findings

### Part 1. Quality of education provided

*Paragraph 2(1), 2(1)(a), 2(1)(b), 2(1)(b)(i), 2(1)(b)(ii), 2(2), 2(2)(a), 2(2)(b), 2(2)(d), 2(2)(d)(i), 2(2)(d)(ii), 2(2)(g), 2(2)(h), 2(2)(e), 2(2)(e)(i), 2(2)(e)(ii), 2(2)(e)(iii), 2(2)(i), 2A(1), 2A(1)(a), 2A(1)(b), 2A(1)(c), 2A(1)(d), 2A(1)(e), 2A(1)(f), 2A(1)(g), 2A(2), 3, 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 4*

- The proprietor body is ambitious for the proposed school and the education that it will provide to pupils. The proprietor body recognises that when pupils join the school, they are likely to have significant gaps in their learning. Leaders therefore intend to provide each pupil with a tailored curriculum that will meet their individual needs. They intend that this will be tailored and flexible. All pupils attending will be pupils with special educational needs and/or disabilities (SEND).
- The proprietor body has written a curriculum policy that makes clear the school's aims. This is founded on a broad curriculum that is commensurate with the breadth of the national curriculum in key stage 2 and key stage 3. Pupils will work towards appropriate qualifications in a range of subjects, ranging from entry-level qualifications to qualifications at level 2. The curriculum is therefore likely to provide pupils with a sufficient breadth of experience and will enable them to gain relevant qualifications.
- Leaders have thought carefully about the content and structure of the curriculum in each subject. They have set out the learning journey in each subject. Further work is under way to provide clarity about the detail that sits behind these aims and objectives. Leaders intend that staff will adapt curriculum plans and consider where pupils' learning should begin in each subject.
- The proprietor body has ensured that there is a policy that sets out the process for assessing pupils' work regularly. This includes the ongoing assessment of pupils during lessons and the processes for formally checking on pupils' learning. Leaders are aware of the anxieties that pupils may have around formal tests and plan to use regular feedback to help check on pupils' knowledge and understanding over time.
- Leaders recognise that pupils are likely to join the school with gaps in their phonic knowledge. They have set out a structure for the school day that will ensure that pupils get the daily help and support they need to help them with their reading. The

headteacher intends to follow a daily programme rigorously and is currently in the process of selecting a particular approach to the delivery of phonics.

- The proprietor body has recruited staff with the necessary expertise to deliver the curriculum effectively to pupils. This includes staff who have experience of working with pupils with SEND.
- The planned programme for relationships and sex education (RSE) will be delivered through the personal, social, health and economic education (PSHE) curriculum. The proprietor body has ensured that the related curriculum documentation provides staff with the resources and information they need to deliver this. Leaders propose to use a commercial scheme of work to deliver this curriculum to pupils. Leaders also plan to weave pupils' wider PSHE through other subjects, for instance by educating pupils about different cultures through their cookery lessons.
- The proprietor body has ensured that there is an RSE policy in place. This includes information for parents and carers if they wish to request that their child is wholly or partly excused from sex education.
- Leaders propose that some elements of pupils' physical education will be delivered off site. They have the necessary links and experience of working with local settings that should enable this to happen.
- Leaders have a careers policy in place that will help to ensure that pupils get relevant information about careers and vocations.
- It is likely that all of the independent school standards (the standards) in this part will be met.

## Part 2. Spiritual, moral, social and cultural development of pupils

*Paragraph 5, 5(a), 5(b), 5(b)(i), 5(b)(ii), 5(b)(iii), 5(b)(iv), 5(b)(v), 5(b)(vi), 5(b)(vii), 5(c), 5(d), 5(d)(i), 5(d)(ii), 5(d)(iii)*

- The proprietor body recognises that the pupils who will attend the proposed school are likely to have experienced a disrupted education. Leaders are committed to helping pupils build their resilience, self-esteem and confidence over time.
- Leaders intend to teach pupils about a range of faiths and cultures through the PSHE curriculum. This curriculum will also enable pupils to learn about the rule of law, individual liberty and democracy. Policies and plans show that the proprietor body has considered this aspect of pupils' education.
- The proprietor body has already set up links with a local voluntary organisation to foster pupils' social development. It intends to use this link to help pupils become active members of their local community and to develop a wider awareness of the world.
- It is likely that the standards in this part will be met.

## Part 3. Welfare, health and safety of pupils

*Paragraph 7, 7(a), 7(b)*

- The proprietor body has paid attention to the current statutory guidance for safeguarding pupils. An up-to-date policy is in place. This makes clear to staff the systems and processes for raising a concern and gives appropriate guidance on how to manage any pupil disclosure. The policy also reflects how leaders will tackle child-on-child abuse. Leaders intend to strengthen this guidance further before the proposed school opens so that it provides further detail for staff if they suspect that child-on-child abuse is taking place. The proprietor body intends to publish this written policy on the school's website so that it is available to view.
- The new headteacher will be the designated safeguarding lead (DSL) and will be supported by two other members of staff who will assume the role of deputy DSL. The proprietor body has sourced training so that these key staff have the required level of knowledge needed to undertake these roles. This is scheduled to take place before the proposed school would open to pupils.
- Appropriate safeguarding training for all staff is planned as part of an induction process, prior to the proposed school opening, to ensure that staff know and understand current legislation and their associated responsibilities. The proprietor body has also planned additional training so that staff know how to use the electronic systems for recording any concerns.
- The proprietor body has considered pupils' online safety when they attend the proposed school. Appropriate filtering systems will be in place so that pupils are not exposed to harmful online content.
- It is likely that the standards in this part will be met.

*Paragraph 9, 9(a), 9(b), 9(c), 10, 14, 15*

- The proposed school's behaviour policy is likely to be implemented suitably. It sets out clearly how leaders intend to support pupils and to help staff manage pupils' behaviour. This considers the potential needs of pupils who will attend the proposed school. As part of induction, the proprietor body intends to provide all staff with training on the policy and the proposed school's behaviour management approach. Staff will record any behavioural incidents on the school's electronic recording system. Leaders will monitor this closely.
- The proposed school has an anti-bullying policy. The policy contains information on types of bullying and the measures leaders will take. It also recognises the risks to pupils from cyber-bullying.
- The proprietor body has planned how best to support and supervise pupils when they join the school. This will include effective supervision during the school day, from ensuring that pupils are welcomed each morning to their safe departure at the end of the school day. The proprietor body plans to admit initially a small number of pupils and has the staffing in place that matches this ambition.
- There are currently no pupils attending the proposed school. The proprietor body has purchased an electronic management information system so that staff can manage the admissions and attendance registers of the proposed school. Leaders intend to complete attendance and admissions registers in line with the Department for Education (DfE) guidance.

- It is likely that the standards in this part will be met.

*Paragraph 11, 12, 13, 16, 16(a), 16(b)*

- The proposed school has an appropriate health and safety policy in place. The proprietor body has sourced advice from an external health and safety company to ensure that staff and pupils will be safe on site. Leaders have booked first-aid training for staff, and this will be part of the initial induction package for staff. Records will be kept of any accidents.
- The proprietor body has installed a new fire-detection system in the building and ensured that appropriate fire-fighting equipment is in place. The inspector saw evidence of the agreement with a specialist company that will service and maintain this equipment. Staff will also make regular checks of the equipment, for instance by testing fire alarms on a weekly basis and completing termly fire drills. A fire risk assessment has not been carried out since the new systems were installed, although the proprietor body could show the inspector the date that this is due to take place. This will be completed prior to any pupils joining the proposed school.
- The school's risk assessment policy sits in the health and safety policy of the school. The proprietor body shared risk assessments from a separate alternative provision that it currently runs to demonstrate how it identifies, manages and reviews risks. These were sufficiently detailed and appropriate. In addition, the proprietor body could demonstrate how individual risk assessments for pupils will be drawn up to help staff meet pupils' specific needs.
- It is likely that the standards in this part will be met.

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

*Paragraph 18(2), 18(2)(a), 18(2)(b), 18(2)(c), 18(2)(c)(i), 18(2)(c)(ii), 18(2)(c)(iii), 18(2)(c)(iv), 18(2)(d), 18(2)(e), 18(3), 19(2), 19(2)(a), 19(2)(a)(i), 19(2)(a)(i)(aa), 19(2)(a)(i)(bb), 19(2)(a)(i)(cc), 19(2)(a)(i)(dd), 19(2)(a)(ii), 19(2)(b), 19(2)(c), 19(2)(d), 19(2)(d)(i), 19(2)(d)(ii), 19(3), 20(6), 20(6)(a), 20(6)(a)(i), 20(6)(a)(ii), 20(6)(b), 20(6)(b)(i), 20(6)(b)(ii), 20(6)(b)(iii), 20(6)(c), 21(1), 21(2), 21(3), 21(3)(a), 21(3)(a)(i), 21(3)(a)(ii), 21(3)(a)(iii), 21(3)(a)(iv), 21(3)(a)(v), 21(3)(a)(vi), 21(3)(a)(vii), 21(3)(a)(viii), 21(3)(b), 21(5), 21(5)(a), 21(5)(a)(i), 21(5)(a)(ii), 21(5)(c), 21(6)*

- The proprietor body has put an electronic single central record in place. This records all the required relevant checks made on staff. The proprietor body has ensured that the staff who maintain this record have an appropriate level of expertise.
- The proprietor body has a sufficiently robust recruitment process in place. The recruitment policy sets out the steps that will be followed when a new member of staff is to be appointed. Interviews for new posts are carried out by the proprietor body and senior leaders. They have completed safer recruitment training. This ensures that the appropriate checks are carried out.
- Leaders do not intend to use agency staff on a regular basis. However, when they do, they understand the relevant checks that they should make. This includes receiving written confirmation from the agency of the checks that have been carried out and confirming the identify of agency staff when they arrive on site.

- It is likely that the standards in this part will be met.

## Part 5. Premises of and accommodation at schools

*Paragraph 23(1), 23(1)(a), 23(1)(b), 23(1)(c), 24(1), 24(1)(a), 24(1)(b), 24(1)(c), 24(2), 25, 26, 27, 27(a), 27(b), 28(1), 28(1)(a), 28(1)(b), 28(1)(c), 28(1)(d), 28(2), 28(2)(a), 28(2)(b), 29(1), 29(1)(a), 29(1)(b)*

- The proposed school is a two-storey building that has served many purposes in the past. Most recently, it was used as a nursery school. The accommodation consists of a range of rooms of different sizes that will be used as classrooms. In addition, there is a large room that will be used as a school hall, a fitted kitchen area, a staff office, a room designated as a medical room and a room that the proprietor body intends to use as a small library space. All rooms have been decorated recently to an acceptable standard and are well maintained, although some would benefit from further finishing touches.
- All rooms are well lit and have good acoustics. The electric lighting in each room has been completely replaced following the damage caused by a burst water main earlier in the year. Each room also benefits from a plentiful supply of natural light.
- The proprietor body has identified a suitable room that will be used as the medical room. It is equipped with washing facilities. A toilet facility for pupils is in an adjacent room. The medical room will be used for no other purpose other than for the treatment of sick and injured pupils. The proprietor body has made suitable arrangements for the safe storage of medicines.
- The building is equipped with three individual toilets. The proprietor body has designated one of these as a staff and visitors toilet, while the other two are for pupils' use only. Each toilet can only be used by one pupil at a time and is lockable from the inside. Each toilet has a washing facility in it. The proprietor body has purchased soap dispensers and paper-towel dispensers. These were seen by the inspector, but they have yet to be mounted on the walls. Plans are in place to ensure that this work is completed prior to any pupils attending the proposed school.
- There is a plentiful supply of hot water, although at the time of the inspection, temperature regulators had not been fitted to ensure that hot water does not pose a scalding risk to pupils. The proprietor body has booked relevant skilled tradespeople to address this prior to any pupils attending the proposed school. The inspector confirmed that these arrangements are in place.
- There is a suitable shower facility for pupils in the proposed school building.
- Arrangements have been made that are likely to meet the other requirements of this part. This includes ensuring that pupils have access to clearly labelled drinking water and that external lighting is in place so that staff, pupils and visitors can enter and leave the premises safely.
- There is a sufficient space for pupils to play outside. This is currently overgrown. The proprietor body has thought carefully about how this space will be used, for instance in allocating an area where pupils will be able to grow vegetables. The proprietor body has arranged for an external organisation to spend four weeks ensuring that this space will be ready for pupils prior to the proposed school opening.

- It is likely that the standards in this part will be met.

#### Part 6. Provision of information

*Paragraph 32(1), 32(1)(a), 32(1)(b), 32(1)(c), 32(1)(d), 32(1)(f), 32(1)(g), 32(1)(h), 32(1)(i), 32(1)(j), 32(k), 32(2), 32(2)(a), 32(2)(b), 32(2)(b)(ii), 32(2)(c), 32(2)(d), 32(3), 32(3)(a), 32(3)(b), 32(3)(c), 32(3)(d), 32(3)(e), 32(3)(f), 32(3)(g), 32(4), 32(4)(a), 32(4)(b), 32(4)(c)*

- The proprietor body has designed a school website that contains information about the proposed school, although this was not 'live' at the time of this inspection. The proprietor body was able to show the inspector the structure of the website. It indicated that the information required to be made available to parents would be on the website.
- The proprietor body plans to ensure that the information required to be provided to parents is issued during the transition period when a pupil joins the proposed school. This will be contained in the school prospectus.
- The proprietor body is well informed about the information that must be produced should the school open. This includes reporting to parents and carers about pupils' progress.
- It is likely that the standards in this part will be met.

#### Part 7. Manner in which complaints are handled

*Paragraph 33, 33(a), 33(b), 33(c), 33(d), 33(e), 33(f), 33(g), 33(h), 33(i), 33(i)(i), 33(i)(ii), 33(j), 33(j)(i), 33(j)(ii), 33(k)*

- As part of the application to register the school, the proprietor body submitted a draft policy to outline the processes for handling complaints. This initial policy did not meet the requirements of this part. For instance, it did not stipulate that one member in a panel hearing for a complaint will be independent of the running of the school. In addition, it stated that a panel would decide whether the parent would be invited to a panel hearing rather than this being done as a matter of course. This policy has subsequently been revised so that it meets the requirement of this part. The proprietor body is therefore aware of its duties in ensuring that the requirements of this part will be met.
- Therefore, it is likely that the standards in this part will be met.

#### Part 8. Quality of leadership in and management of schools

*Paragraph 34(1), 34(1)(a), 34(1)(b), 34(1)(c)*

- The proprietor body has appointed leaders who demonstrate the skills and knowledge appropriate to their role so that the standards will be consistently met. The proprietor body also intends to take an active role in ensuring that the standards are fully met if the proposed school opens and that they then continue to be met.

- The proprietor body has put a governance structure in place to hold leaders to account, both in terms of the quality of education and the standards. The individuals appointed to this role have the education experience needed to be effective.
- The proprietor body has taken the required actions to make sure that pupils' well-being will be promoted if the proposed school opens.
- The proprietor body has ensured that these standards are likely to be met.

#### Schedule 10 of the Equality Act 2010

- The school has a suitable accessibility plan in place that meets the requirements of schedule 10 of the Equality Act 2010.

## **Compliance with regulatory requirements**

The school is likely to meet the requirements of the schedule to the Education (Independent School Standards) Regulations 2014 ('the independent school standards') and associated requirements.



## Proposed school details

Unique reference number	149469
DfE registration number	884/6019
Inspection number	10262228

This inspection was carried out under section 99 of the Education and Skills Act 2008, the purpose of which is to advise the Secretary of State for Education about the school's likely compliance with the independent school standards that are required for registration as an independent school.

Type of school	Independent school
School status	Independent special school
Proprietor	Mercia Learning CIC
Headteacher	Not known
Annual fees (day pupils)	£35,000 to £70,000
Telephone number	07532 799809
Website	<a href="http://www.gem.mercialearning.org.uk">www.gem.mercialearning.org.uk</a>
Email address	<a href="mailto:debra@mercialearning.co.uk">debra@mercialearning.co.uk</a>
Date of previous standard inspection	Not previously inspected

## Pupils

	<b>School's current position</b>	<b>School's proposal</b>	<b>Inspector's recommendation</b>
Age range of pupils	Not applicable	8 to 18	8 to 18
Number of pupils on the school roll	Not applicable	35	12

### *Reason for inspector's recommendations*

- The proposed school's current staffing appointments would not support a roll number of 35 pupils. I would therefore recommend that the school's roll be reduced to 12. The proprietor agreed that this was a reasonable adjustment to make. The proprietor intends to expand the number of pupils on the school roll through a subsequent material change inspection when sufficient staffing levels are in place to facilitate this.

## Pupils

	<b>School's current position</b>	<b>School's proposal</b>
Gender of pupils	Mixed	Mixed
Number of full-time pupils of compulsory school age	Not applicable	35
Number of part-time pupils	Not applicable	0
Number of pupils with special educational needs and/or disabilities	Not applicable	35
Of which, number of pupils with an education, health and care plan	Not applicable	35
Of which, number of pupils paid for by a local authority with an education, health and care plan	Not applicable	35

## Staff

	<b>School's current position</b>	<b>School's proposal</b>
Number of full-time equivalent teaching staff	Not applicable	18
Number of part-time teaching staff	Not applicable	6

Number of staff in the welfare provision

Not applicable

5

### **Information about this proposed school**

- The proprietor body runs an unregistered alternative provision based in the centre of Hereford. This provides tuition packages to pupils who are not attending school. The proprietor body intends that this provision will remain separate from the proposed school.
- The proposed school will cater exclusively for pupils with SEND. It will cater for pupils with a range of needs, including those associated with autism spectrum disorder and social, emotional and mental health needs. It is expected that most pupils will have an education, health and care plan. Pupils will be placed in the school by local authorities, mainly from Herefordshire.
- There are four directors on the board of proprietors.
- The proprietor body intends to establish a governing body to provide additional oversight of the school. It has have set up the terms of reference for this body and has appointed a chair. It is in the process of carrying out the necessary checks.
- A headteacher and five other members of staff have been appointed and will begin their employment with the school in September 2023.
- The proposed school is located in a quiet residential area on the outskirts of Hereford. It was originally built as a residential children's home and was last used as a nursery school.
- The proposed school will not have a religious denomination.
- Leaders intend to use alternative provision. They intend that this will be used to provide pupils with experience of agriculture, which they cannot provide on site.

## Information about this inspection

- This pre-registration inspection was commissioned by the Department for Education to evaluate the provider's readiness to open a school. The inspector checked all the appropriate independent school standards, including Parts 1 to 8.
- This was the first pre-registration inspection.
- A range of documents was submitted electronically. These were reviewed remotely by the lead inspector prior to the inspection. Additional documents, including the school's single central record and curriculum information, were scrutinised on site.
- The inspector met with a member of the proprietor body, the pastoral manager and recently appointed staff. This included meetings with the headteacher.
- The inspector conducted a full visit of the site, including the outside areas.

## Inspection team

Ian Tustian, lead inspector

His Majesty's Inspector

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