

## APPENDIX - Queen Victoria School, Dunblane

### Part C - Prevention and Identification

#### 4. Policy and Practice

##### 4.1 National

###### Past

- i. Was there national policy/guidance relevant to the provision of residential, care for children?

For the latter period of interest to the Inquiry we are aware of such policy/guidance. We do not hold records that would confirm the existence of such policy/guidance during the earlier period of interest to the Inquiry, but we would reasonably infer that such policy/guidance existed.

- ii. If so, to what extent was the organisation aware of such?

For the latter period of interest to the Inquiry we are aware of such policy/guidance. We do not hold records that would confirm the awareness of such policy/guidance during the earlier period of interest to the Inquiry, but we would reasonably infer that such awareness existed, given the War Office's/MOD's obligations as a Department of State.

- iii. If there was national policy/guidance in respect of any of the following in relation to provision of residential care for children, to what extent was the organisation aware of such?

- Child welfare (physical and emotional)

See answer to 4.1.ii above.

- Child protection

See answer to 4.1.ii above.

- Complaints handling

See answer to 4.1.ii above.

- Whistleblowing

See answer to 4.1.ii above.

- Management of residential establishments

See answer to 4.1.ii above.

- Child migrants

N/A. Based on the records available to us we do not believe the War Office/MOD played any part in national child migration.

- Record retention

See answer to 4.1.ii above.

- Recruitment and training of residential care staff

See answer to 4.1.ii above.

- Requiring employers to divulge details of complaints etc. to prospective employers

See answer to 4.1.ii above.

- Reviewing a child's continued residence at a residential establishment

See answer to 4.1.ii above.

- iv. If the organisation was aware of such, did they give effect to that policy/guidance?

For the latter period of interest to the Inquiry we are aware that the MOD gave effect to such policy/guidance. We do not hold records that would confirm that the War Office/MOD gave effect to such policy/guidance during the earlier period of interest to the Inquiry, but we would reasonably infer that this was the case, given the War Office's/MOD's obligations as a Department of State.

- v. If so, how was effect given to such policy/guidance?

For the latter period of interest to the Inquiry we are aware that the MOD gave effect to such policy/guidance by reflecting relevant elements in internal MOD policy and guidance. We do not hold records that would confirm that the War Office/MOD gave effect to such policy/guidance in the same way during the earlier period of interest to the Inquiry, but we would reasonably infer that this was the case, given the War Office's/MOD's obligations as a Department of State.

- vi. If not, why not?

N/A.

Present

- vii. With reference to the present position, are the answers to any of the above questions different?

No.

- viii. If so, please give details.

N/A.

#### 4.2 Local Authority

Past

- i. Was there local authority policy/guidance relevant to provision of residential care for children?

No. Queen Victoria School was not under the control of a Local Authority.

ii. If so, to what extent was the organisation aware of such?

N/A.

iii. If there was local authority policy/guidance in respect of any of the following in relation to provision of residential care for children, to what extent was the organisation aware of such?

- Child welfare (physical and emotional)

N/A.

- Child protection

N/A.

- Complaints handling

N/A.

- Whistleblowing

N/A.

- Management of residential establishments

N/A.

- Child migrants

N/A.

- Record retention

N/A.

- Recruitment and training of residential care staff

N/A.

- Requiring employers to divulge details of complaints etc. to prospective employers

N/A.

- Reviewing a child's continued residence at a residential establishment

N/A.

iv. If the organisation was aware of such, did they give effect to that policy/guidance?

N/A.

v. If so, how was effect given to such policy/guidance?

N/A.

vi. If not, why not?

N/A.

Present

vii. With reference to the present position, are the answers to any of the above questions different?

N/A.

viii. If so, please give details.

N/A.

#### 4.3 Admissions

##### (a) Policy

Past

i. What policies and/or procedures did the organisation/establishment have in place in relation to admission of children to the establishment?

Through application by eligible Parents/Guardians following the admission procedures laid down in the Royal Warrant.

ii. Was there a particular policy and/or procedural aim/intention?

Yes: to direct the QVS Admissions Panel to offer school places in accordance with the eligibility and prioritisation criteria directed in the Royal Warrant.

iii. Where were such policies and/or procedures recorded?

In the Royal Warrant, the school's 'Boarding School Arrangements' (BSA) documentation and most recently on the school's website.

iv. Who compiled the policies and/or procedures?

The Commandant/Head Teacher with oversight from Her Majesty's Commissioners.

v. When were the policies and/or procedures put in place?

From the School admitting its first pupils in 1908.

vi. Do such policies and/or procedures remain in place?

Yes.

vii. Were such policies and/or practices reviewed?

Yes.

viii. If so, what was the reason for review?

To ensure compliance with periodic revisions of the Royal Warrant, and changes in educational legislation.

- ix. What substantive changes, if any, were made to the policies and/or procedures over time?

Only that reflecting the male-only admission criteria laid down in the 1905 Constitution and Royal Warrant; and the change to co-educational entry laid down in the 1992 Royal Warrant. Girls were first admitted in 1996.

- x. Why were changes made?

To ensure compliance with periodic revisions of the Royal Warrant, and changes in educational legislation; and to allow the School to become co-educational.

- xi. Were changes documented?

Yes.

- xii. Was there an audit trail?

Yes.

Present

- xiii. With reference to the present position, are the answers to any of the above questions different?

No.

- xiv. If so, please give details.

N/A.

(b) Practice

Past

- i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to the admission of children to the establishment?

Yes.

- ii. How was the adherence demonstrated?

For the latter period of this investigation, the outcomes of admissions decisions are recorded after meetings between the School Senior Leadership Team and Her Majesty's Commissioners. We do not hold documentation demonstrating adherence during the earlier period of interest to the Inquiry. However, as the admission procedures are laid down in a Royal Warrant, we can reasonably infer that policy and procedure was adhered to.

- iii. How can such adherence be demonstrated to the Inquiry?

We do not hold documentation demonstrating adherence during the earlier period of interest to the Inquiry. Recent record keeping in relation to admissions can be provided on request.

- iv. Were relevant records kept demonstrating adherence?

We do not hold documentation demonstrating adherence during the earlier period of interest to the Inquiry. Recent record keeping in relation to admissions can be provided on request.

- v. Have such records been retained?

Pupil records (including admissions information) dating back to 1962 have been retained by the School.

- vi. If policy/procedure was not adhered to in practice, why not?

N/A.

- vii. If policy/procedure was not adhered to in practice, what was the practice?

N/A.

Present

- viii. With reference to the present position, are the answers to any of the above questions different?

No.

- ix. If so, please give details.

N/A.

#### 4.4 Day to Day

##### (a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to the day to day running of the establishment?

QVS was required to meet all relevant statutory direction in respect of children at the school. As a Department of State, the War Office/MOD policy has usually reflected contemporary government policy, principally through following statutory direction in relevant legislation. In the more recent past QVS provides all parents with a copy of Boarding School Arrangements (BSA) which describe daily routines, policy and procedures.

- ii. Was there a particular policy and/or procedural aim/intention?

To provide continuity and stability in education for children of armed forces personnel.

- iii. Where were such policies and/or procedures recorded?

We do not have access to records relating to the earlier part of the period of interest to this inquiry. We would reasonably infer that policies and procedures were recorded by QVS and the MOD/War Office. QVS policies and procedures have been routinely and regularly updated and recorded in line with changes in the relevant legislation and routine advice from professional bodies.

- iv. What did the policies and/or procedures set out in terms of the following?
- Activities for children  
Normal academic and social development activities associated with contemporary educational practice of the time.
  - Off-site activities for children including trips, holidays and visits to family  
A range of Academic, sporting and pastoral activities following the Scottish National Curriculum (and its predecessor curricula) as directed in the Royal Warrant.
  - Schooling/education  
As directed by Education Scotland and its predecessors.
  - Discipline  
Discipline policies have changed over the years but have always reflected social norms of respective time periods.
- v. Who compiled the policies and/or procedures?  
Commandant/Head Teacher/Her Majesty's Commissioners.
- vi. When were the policies and/or procedures put in place?  
To the best of our knowledge they have been in place since the establishment of QVS.
- vii. Do such policies and/or procedures remain in place  
Yes.
- viii. Were such policies and/or practices reviewed?  
We would reasonably infer that policies and procedures have been under constant review, reflecting social norms as time passes.
- ix. If so, what was the reason for review?  
QVS policies/procedures have been routinely and regularly updated in line with changes in the relevant legislation and routine advice from professional bodies.
- x. What substantive changes, if any, were made to the policies and/or procedures over time?

There have been no substantive changes but policies and procedures have become more inclusive, striving for equality in all aspects of life, as per social norms.

xi. Why were changes made?

QVS policies/procedures have been routinely and regularly updated in line with changes in the relevant legislation and routine advice from professional bodies.

xii. Were changes documented?

We do not hold records that go back far enough to confirm that changes were documented throughout the entire period of interest to the Inquiry.

xiii. Was there an audit trail?

We do not hold records that go back far enough to confirm that changes were documented throughout the entire period of interest to the Inquiry.

Present

xiv. With reference to the present position, are the answers to any of the above questions different?

No.

xv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures relating to the day to day running of the establishment?

Whilst we do not hold records covering the full period of interest to the Inquiry, we would reasonably infer that QVS adhered in practice to its policy/procedures relating to the day to day running of the establishment, particularly given that it was part of a Department of State (the War Office/MOD) which was required to meet all relevant statutory direction in respect of children at the school.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of the following?

- Activities for children

As far as we are aware.

- Off-site activities for children including trips, holidays and visits to family

As far as we are aware.

- Schooling/education



As far as we are aware.

- Discipline

As far as we are aware.

- iii. How was adherence demonstrated?

We do not hold records that can demonstrate adherence for the entire period of interest to the Inquiry. However, QVS, along with every other school in Scotland, is subject to visits from Her Majesty's Inspectorate of Education and the Care Inspectorate and recent reports are a matter of public record.

- iv. How can such adherence be demonstrated to the Inquiry?

We can provide documentation for the later period of interest to the Inquiry. Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, we would reasonably infer that adherence was the norm.

- v. Were relevant records kept demonstrating adherence?

Not for the earlier period of interest to the Inquiry.

- vi. Have such records been retained?

Not for the earlier period of interest to the Inquiry.

- vii. If policy/procedure was not adhered to in practice, why not?

N/A.

- viii. If policy/procedure was not adhered to in practice, what was the practice?

N/A.

Present

- ix. With reference to the present position, are the answers to any of the above questions different?

No.

- x. If so, please give details.

N/A.

#### 4.5 Children

- (a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to caring for children at the establishment?

QVS was opened to provide a stable and secure boarding school environment for children who had lost at least one parent in active service for the British military. As the school evolved, the primary goal of QVS was to provide stability and continuity of education for any child with a parent who was in the military. It is reasonable to infer that historical policies and procedures were in place to ensure those children were cared for appropriately.

- ii. Was there a particular policy and/or procedural aim/intention?

The school is essentially a 'benefit to service' for military families.

- iii. Where were such policies and/or procedures recorded?

We do not hold records covering the entire period of interest to the Inquiry but the QVS has always been accountable to the War Office/MOD.

- iv. What did the policies and/or procedures set out in terms of the following?

Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, it can be reasonably be inferred that adherence was the norm. Policies have changed over the years but have always reflected social norms of respective time periods. For all sections below, we can provide documentation for the later period of interest to the Inquiry.

- Safeguarding

See 4.5.(a).iv above.

- Child Protection

See 4.5.(a).iv above.

- Medical care

See 4.5.(a).iv above. For the later period of interest to the Inquiry the school has had a 24-hour medical centre (now called the Health and Wellbeing Centre) staffed by Nurses, and full access to NHS primary and secondary health and dental care.

- Children's physical wellbeing

See 4.5.(a).iv above.

- Children's emotional and mental wellbeing

See 4.5.(a).iv above.

- v. Who compiled the policies and/or procedures?

Commandant/Head Teacher/Her Majesty's Commissioners/MOD.

- vi. When were the policies and/or procedures put in place?

We believe policies and procedures have always been in place since the establishment of QVS, but do not hold records covering the entirety of the period of interest to the Inquiry.

- vii. Do such policies and/or procedures remain in place?

Yes. Safeguarding and wellbeing are very important to QVS.

- viii. Were such policies and/or practices reviewed?

We believe policies and procedures have been reviewed regularly, but we do not hold records covering the entirety of the period of interest to the Inquiry. We understand that a major review of policy in relation to stamping out peer on peer bullying took place in the early 1990s. This included the appointment of a Deputy Head teacher with that specific responsibility.

- ix. If so, what was the reason for review?

To ensure compliance with relevant legislation and routine advice from professional bodies. In the case of the specific review mentioned at 4.5.(a).viii above we believe that peer on peer bullying had been reported in the press and this was part of the school's response to those reports, following a review.

- x. What substantive changes, if any, were made to the policies and/or procedures over time?

Any substantive changes to policy were done in order to further safeguard children. Our policies/procedures have been routinely and regularly updated in line with changes in the relevant legislation and routine advice from professional bodies. Prior to becoming a coeducational facility changes were made to policies from 1994 in preparation for the first admission of girls in 1996.

- xi. Why were changes made?

To ensure the continued welfare of children in the care of QVS.

- xii. Were changes documented?

We do not hold records for the entirety of the period in question but reasonably infer that these changes were documented in the Boarding School Arrangements of that time.

- xiii. Was there an audit trail?

We do not hold records for the entirety of the period in question but reasonably infer that these changes were documented in the Boarding School Arrangements of that time.

#### Present

- xiv. With reference to the present position, are the answers to any of the above questions different?

Minor changes have taken place reflecting changes in legislation and statutory guidance.

xv. If so, please give details.

All current policies relating to safeguarding, child protection etc are up to date and are in line with relevant statutory direction. These are available on request.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures relating to the care of children at the establishment?

Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, adherence can reasonably be inferred to be the norm. We do not hold records covering the entirety of the period in question.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of the following?

- Safeguarding

See 4.5.(b).i above.

- Child Protection

See 4.5.(b).i above.

- Medical care

See 4.5.(b).i above.

- Children's physical wellbeing

See 4.5.(b).i above.

- Children's emotional and mental wellbeing

See 4.5.(b).i above.

iii. How was adherence demonstrated?

We do not hold records that can demonstrate adherence for the entire duration of this investigation. However, QVS, along with every other school in Scotland, is subject to visits from Her Majesty's Inspectorate of Education and the Care Inspectorate and recent reports are a matter of public record.

iv. How can such adherence be demonstrated to the Inquiry?

We can provide documentation for the later period of interest to the Inquiry. Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, we would reasonably infer that adherence was the norm.

v. Were relevant records kept demonstrating adherence?

Not for the earlier period of interest to the Inquiry.

- vi. Have such records been retained?

Not for the earlier period of interest to the Inquiry.

- vii. If policy/procedure was not adhered to in practice, why not?

N/A.

- viii. If policy/procedure was not adhered to in practice, what was the practice?

N/A.

Present

- ix. With reference to the present position, are the answers to any of the above questions different?

No.

- x. If so, please give details.

N/A.

#### 4.6 Staffing

##### (a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in relation to staffing at the establishment?

Staffing at QVS was carried out using War Office/MOD procedures in the earlier part of the timeframe. From the 1950s onward there would have been a move towards MOD Civilian recruitment. Latterly all staffing is MOD Civilian and follows the Civil Service Principles and MOD policy. This includes Security checks and the Protecting Vulnerable Groups scheme. Wider best practice has also been followed linking into the codes of practice for the Scottish Social Services Council and the General Teaching Council for Scotland for key Boarding House and Teaching Staff.

- ii. Was there a particular policy and/or procedural aim/intention?

Latterly to ensure compliance with Government direction, best practice and guidance from outside organisations such as the Care Inspectorate.

- iii. Where were such policies and/or procedures recorded?

In the MOD's Military and Civilian policies which were retained in the HQ organisations of the day. The policies were constantly updated across the MOD. Since the 1990's the Policies have been gradually transferred to centrally maintained electronic documents.

- iv. What did the policies and/or procedures set out in terms of the following?

- Pre-employment checks

MOD security checks looked at the background, criminal records checks, financial situation etc of all staff. More recently Protecting Vulnerable Groups checks have been carried out on all new starts with revalidation every 2 years. Gaps in employment have been queried, references taken up, health checks carried out; in line with safer recruitment.

- Recruitment

Employment of military staff followed Service processes. Employment of MOD Civilian Staff was based on MOD and Civil Service Commission rules covering both permanent and temporary staff.

- Induction

In the last 20 years comprehensive induction programmes have been run.

- Transfer of staff to or from other establishments within or outwith the organisation

As a MOD unit it has always been possible to transfer into or from QVS to or from another MOD site providing the staff member had the appropriate security clearance or more recently disclosure status.

- References

References have always been taken up. Currently we seek referees for at least the last 3 years with all periods of time requiring cover.

- Appraisal/supervision

Military Appraisals would have been in place in the early part of the period. MOD Civilian Staff appraisal systems have been used for non-military staff with the exception of teachers where General Teaching Council of Scotland systems are used.

- Training

Mandatory/essential Training has been provided through MOD. Non-mandatory/essential training was approved on a case by case basis.

- Personal/Professional development

Policies have tended to flow from the Performance Appraisal Reviews to target individual needs.

- Disciplinary actions

In line with Military Law for Serving staff and MOD Policies for MOD Civilians (including teaching staff).

- Dismissal

In line with Military Law for Serving staff and MOD Policies for MOD Civilians (including teaching staff).

- v. Who compiled the policies and/or procedures?  
The War Office/MOD.
- vi. When were the policies and/or procedures put in place?  
War Office policies were in place prior to the creation of QVS, and followed thereafter.
- vii. Do such policies and/or procedures remain in place?  
Yes.
- viii. Were such policies and/or practices reviewed?  
Regularly reviewed by the War Office/MOD.
- ix. If so, what was the reason for review?  
To adhere to Government Policy, UK Law and best practice within the Department and the wider educational community.
- x. What substantive changes, if any, were made to the policies and/or procedures over time?  
There have been many, but they mainly relate to mainstream MOD sites or processes.
- xi. Why were changes made?  
To adhere to Government Policy, UK Law and best practice within the Department and the wider educational community.
- xii. Were changes documented?  
Yes, in War Office/MOD policy documents.
- xiii. Was there an audit trail?  
Yes, in War Office/MOD policy documents.

Present

- xiv. With reference to the present position, are the' answers to any of the above questions different?

No.

- xv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to staffing at the establishment?

Yes, as far as we are aware. Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, adherence can reasonably be inferred to be the norm. We do not hold records covering the entirety of the period in question.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of the following?

- Pre-employment checks

As for 4.6.(b).i above.

- Recruitment

As for 4.6.(b).i above.

- Inductions

As for 4.6.(b).i above.

- Transfers to and from other establishments within or outwith the organisation

As for 4.6.(b).i above.

- References

As for 4.6.(b).i above.

- Appraisals/Supervision

As for 4.6.(b).i above.

- Training

As for 4.6.(b).i above.

- Personal/Professional development

As for 4.6.(b).i above.

- Disciplinary actions

As for 4.6.(b).i above.

- Dismissal

As for 4.6.(b).i above.

iii. How was adherence demonstrated?

Through QVS/MOD files, albeit we do not hold records covering the entirety of the period in question.



- iv. How can such adherence be demonstrated to the Inquiry?

Through QVS/MOD files, albeit we do not hold records covering the entirety of the period in question.

- v. Were relevant records kept demonstrating adherence?

Yes, in line with MOD policies on record retention, albeit we do not hold records covering the entirety of the period in question.

- vi. Have such records been retained?

Yes, in line with MOD policies on record retention, albeit we do not hold records covering the entirety of the period in question.

- vii. If policy/procedure was not adhered to in practice, why not?

N/A

Present

- viii. With reference to the present position, are the answers to any of the above questions different?

No.

- ix. If so, please give details.

N/A.

#### 4.7 Visitors

##### (a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to visitors to the establishment?

For the latter period of interest to the Inquiry QVS followed MOD policy and relevant legislation and professional guidance for visitors to the establishment. We do not hold records covering the entirety of the period of interest to the Inquiry.

- ii. Was there a particular policy and/or procedural aim/intention?

For the latter period of interest to the Inquiry the aim was to ensure the security of QVS, and the safeguarding of the children within it. We do not hold records covering the entirety of the period of interest to the Inquiry, but would infer that this would also have been the aim in previous years.

- iii. Where were such policies and/or procedures recorded?

For the latter period of interest to the Inquiry, in MOD and QVS policy documents. We do not hold records covering the entirety of the period of interest to the Inquiry.

- iv. Who compiled the policies and/or procedures?

For the latter period of interest to the Inquiry, MOD and Headteacher/Her Majesty's Commissioners. We do not hold records covering the entirety of the period of interest to the Inquiry.

- v. When were the policies and/or procedures put in place?

We do not hold records covering the entirety of the period of interest to the Inquiry, and cannot state when these policies/procedures were put in place.

- vi. Do such policies and/or procedures remain in place?

Yes.

- vii. Were such policies and/or practices reviewed?

For the latter period of interest to the Inquiry, yes. We do not hold records covering the entirety of the period of interest to the Inquiry.

- viii. If so, what was the reason for review?

To confirm that visitor policies/procedures continued to follow extant MOD policy and best practice, and remained fit for purpose in QVS.

- ix. What substantive changes, if any, were made to the policies and/or procedures over time?

Substantive changes that we have knowledge of were in put in place to ensure that all visitors who do not have an appropriate level of Protecting Vulnerable Groups check are accompanied at all times. Currently, visitors to the school are generally on business matters or to provide educational services to children. It is reasonable to assume that this has always been the case. Parents/Families can also visit and sign in to Boarding Houses.

- x. Why were changes made?

To ensure security and safeguarding procedures in relation to visitors were in place.

- xi. Were changes documented?

Recent policy documents are available.

- xii. Was there an audit trail?

Yes. Recent policy documents are available.

Present

- xiii. With reference to the present position, are the answers to any of the above questions different?

No.

- xiv. If so, please give details.

N/A.

(b) Practice

Past

- i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to visitors to the establishment?

We would reasonably infer that it did though cannot vouch for the earlier years of the period of interest to the Inquiry.

- ii. How was adherence demonstrated?

Visitor sign in record sheets from recent years show adherence, though we cannot vouch for the earlier years of the period of interest to the Inquiry.

- iii. How can such adherence be demonstrated to the Inquiry?

Visitor sign in record sheets from recent years show adherence and can be shared with the Inquiry on request, though we cannot vouch for the earlier years of the period of interest to the Inquiry.

- iv. Were relevant records kept demonstrating adherence?

In terms of a visitor record in recent years, yes.

- v. Have such records been retained?

Only visitor records from recent years.

- vi. If policy/procedure was not adhered to in practice, why not?

N/A.

Present

- vii. With reference to the present position, are the answers to any of the above questions different?

No.

- viii. If so, please give details.

N/A.

4.8 Volunteers

(a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to volunteers at the establishment?

We are not aware of any particular policies and/or procedures. However, it can be inferred that QVS had a number of military volunteers in terms of cadets and

other similar activities. We do have a small number of volunteer students on an annual basis. It is reasonable to infer that volunteers have always come under MOD rules and regulations.

- ii. Was there a particular policy and/or procedural aim/intention?

Any volunteer would be in place to support the learning of our young people.

- iii. Where were such policies and/or procedures recorded?

We are not aware of such policies or procedures being recorded.

- iv. Who compiled the policies and/or procedures?

We are not aware of who compiled such policies or procedures.

- v. When were the policies and/or procedures put in place?

Policies and procedures have been in place since 2006. We cannot state with certainty whether such policies and procedures were in place before 2006.

- vi. Do such policies and/or procedures remain in place?

Yes. We have current policy/procedures in place for all volunteers, following strict MOD guidelines.

- vii. Were such policies and/or practices reviewed?

Policies and procedures have been reviewed over time in light of new statutory direction and professional guidance.

- viii. If so, what was the reason for review?

To reflect changes in statutory direction and professional guidance.

- ix. What substantive changes, if any, were made to the policies and/or procedures over time?

Substantive changes that we have knowledge of were in put in place to ensure that all volunteers have an appropriate level of Protecting Vulnerable Groups check and are accompanied at all times.

- x. Why were changes made?

To reflect changes in statutory direction and professional guidance.

- xi. Were changes documented?

Yes, within the relevant policy documents.

- xii. Was there an audit trail?

Yes.

Present

xiii. With reference to the present position, are the answers to any of the above questions different?

No.

xiv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to volunteers at the establishment?

In the later period of interest to the Inquiry, yes. We are not aware of what that policy or those procedures were in the earlier period of interest to the Inquiry but would reasonably infer that QVS adhered to any relevant policies or procedures that it had.

ii. How was adherence demonstrated?

We are not aware how adherence was demonstrated in the earlier period of interest to the Inquiry. More recently through MOD personnel records for volunteer staff.

iii. How can such adherence be demonstrated to the Inquiry?

We are not aware how adherence could be demonstrated in the earlier period of interest to the Inquiry. More recently through MOD personnel records for volunteer staff.

iv. Were relevant records kept demonstrating adherence?

Yes (since 2006).

v. Have such records been retained?

Yes, in line with MOD employment record retention policies.

vi. If policy/procedure was not adhered to in practice, why not?

N/A.

Present

vii. With reference to the present position, are the answers to any of the above questions different?

No.

viii. If so, please give details.

N/A.

4.9 Complaints and Reporting

(a) Policy.

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to complaints and reporting at the establishment?

In the later period of interest to the Inquiry, complaints have come to the Headteacher/Commandant and been escalated to the chair of Her Majesty's Commissioners as appropriate, following MOD policies where appropriate. We are not aware of what policies or procedures were in place in the earlier period of interest to the Inquiry, but would reasonably infer that QVS adhered to any relevant War Office/MOD policies or procedures, and followed educational best practice.

- ii. Was there a particular policy and/or procedural aim/intention?

In the later period of interest to the Inquiry, to allow the timely and effective resolution of legitimate complaints. We are not aware of what policies or procedures were in place in the earlier period of interest to the Inquiry, but would reasonably infer that the aim/intention would have been similar.

- iii. Where were such policies and/or procedures recorded?

In the later period of interest to the Inquiry, such policies and/or procedures have been recorded in MOD Policy documents and the QVS Boarding School Arrangements. We are not aware where such policies and/or procedures were recorded in the earlier period of interest to the Inquiry, but would reasonably infer that they were also recorded in War Office/MOD policies, and within appropriate QVS policies.

- iv. What did the policies and/or procedures set out in terms of the following?

- Complaints by children

In the later period of interest to the Inquiry such MOD and QVS policies and/or procedures explained when and how to make a complaint, the process for investigating the complaint, how decisions would be promulgated/implemented, and how to appeal. We do not have such detail for the earlier period of interest to the Inquiry, but would reasonably infer that they were similar.

- Complaints by staff

As for first bullet.

- Complaints by third persons/family of children

As for first bullet.

- Whistleblowing

As for first bullet, noting that whistleblowing policy is held at MOD level.

- Support, including external support, for those who made complaint or those who were the subject of complaint

As for first bullet.

- Response to complaints (including response by organisation and/or establishment)

As for first bullet.

- External reporting of complaints

As for first bullet.

- v. Who compiled the policies and/or procedures?

In the later period of interest to the Inquiry either by MOD, or by Headteacher/Her Majesty's Commissioners following MOD Policy and relevant statutory guidance and educational/safeguarding best practice. We do not hold documentation demonstrating this for the earlier period of interest to the Inquiry.

- vi. When were the policies and/or procedures put in place?

Such policies and/or procedures were in place during the later period of interest to the Inquiry, but we do not hold documentation from the earlier period of interest to the Inquiry that would confirm implementation dates.

- vii. Do such policies and/or procedures remain in place?

Yes

- viii. Were such policies and/or practices reviewed?

In the later period of interest to the Inquiry, yes. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- ix. If so, what was the reason for review?

To reflect changes in statutory direction and professional guidance; and MOD policy.

- x. What substantive changes, if any, were made to the policies and/or procedures over time?

In the later period of interest to the Inquiry, those changes required to comply with changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xi. Why were changes made?

In the later period of interest to the Inquiry, to reflect changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xii. Were changes documented?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

xiii. Was there an audit trail?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

Present

xiv. With reference to the present position, are the answers to any of the above questions different?

No.

xv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to complaints and reporting at the establishment?

In the later period of interest to the Inquiry, yes. Whilst we do not hold records demonstrating adherence in the earlier period of interest to the Inquiry, we infer that QVS and the MOD adhered to its policy/procedures, given that the MOD, as a Department of State, was required to meet all relevant statutory direction in respect of children at the school.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of the following?

- Complaints by children  
See 4.9.(b).i. above.
- Complaints by staff  
See 4.9.(b).i. above.
- Complaints by third persons/family of children  
See 4.9.(b).i. above.
- Whistleblowing  
See 4.9.(b).i. above.
- Support, including external support, for those who made complaint or those who were the subject of complaint  
See 4.9.(b).i. above.



- Response to complaints (including response by organisation and/or establishment)

See 4.9.(b).i. above.

- External reporting of complaints

See 4.9.(b).i. above.

iii. How was adherence demonstrated?

In the later period of interest to the Inquiry a complaints log is kept centrally, checked annually by the Care Inspectorate.; See 4.9.(b).i. above.

iv. How can such adherence be demonstrated to the Inquiry?

See 4.9.(b).i. and iii. above.

v. Were relevant records kept demonstrating adherence?

See 4.9.(b).i. and iii. above.

vi. Have such records been retained?

See 4.9.(b).i. and iii. above. A record of complaints and some student records remain on file.

vii. If policy/procedure was not adhered to in practice, why not?

N/A.

Present

viii. With reference to the present position, are the answers to any of the above questions different?

No.

ix. If so, please give details.

N/A.

#### 4.10 Internal Investigations

(a) Policy

Past

i. What policies and/or procedures did the organisation/establishment have in place in respect of internal investigations relating to the establishment?

In the later period of interest to the Inquiry, internal investigations have been dealt with by the Headteacher/Commandant and escalated to the chair of Her Majesty's Commissioners as appropriate; or conducted externally under MOD policies and procedures. Whilst we do not hold records covering the initial period of interest to the Inquiry we infer that similar procedures were followed.

ii. Was there a particular policy and/or procedural aim/intention?

In the later period of interest to the Inquiry, to allow the timely and effective investigation of legitimate concerns/complaints. We are not aware of what policies or procedures were in place in the earlier period of interest to the Inquiry, but would reasonably infer that the aim/intention would have been similar.

iii. Where were such policies and/or procedures recorded?

In the later period of interest to the Inquiry, such policies and/or procedures have been recorded in MOD and QVS Policy documents. We are not aware where such policies and/or procedures were recorded in the earlier period of interest to the Inquiry, but would reasonably infer that they were also recorded in War Office/MOD policies, and within appropriate QVS policies.

iv. What did the policies and/or procedures set out in terms of the following?

- Approach to/process of internal investigations

For all sections below, we can provide documentation for the later period of interest to the Inquiry. Given that, as a Department of State, the War Office (now MOD) was required to meet all relevant statutory direction in respect of the children at the school, we can infer that adherence was the norm. Policies have changed over the years but have always reflected social norms of respective time periods.

- Identifying lessons/changes following internal investigations

As for first bullet.

- Implementation of lessons/changes following internal investigations

As for first bullet.

- Compliance

As for first bullet.

- Response (to child and abuser)

As for first bullet. Recent records indicate that families have always been informed of the result of internal investigations.

- Response to complaints (including response by organisation and/or establishment)

As for first bullet. In recent years, a complaints log has been kept.

- External reporting following internal investigations

As for first bullet. For all internal investigations in the later period of interest to the Inquiry the following statutory bodies are informed: MOD, Registrar of Independent Schools, Scottish Social Services Council, General Teaching Council of Scotland. The police are informed immediately if there are any

concerns that laws may have been broken. We do not hold records providing such detail for the earlier period of interest to the Inquiry.

- v. Who compiled the policies and/or procedures?

In the later period of interest to the Inquiry either by MOD, or by Headteacher/Her Majesty's Commissioners following MOD Policy and relevant statutory guidance and educational/safeguarding best practice. We do not hold documentation demonstrating this for the earlier period of interest to the Inquiry.

- vi. When were the policies and/or procedures put in place?

Such policies and/or procedures were in place during the later period of interest to the Inquiry, but we do not hold documentation from the earlier period of interest to the Inquiry that would confirm implementation dates.

- vii. Do such policies and/or procedures remain in place?

Yes.

- viii. Were such policies and/or practices reviewed?

In the later period of interest to the Inquiry, yes. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- ix. If so, what was the reason for review?

To reflect changes in statutory direction and professional guidance; and MOD policy.

- x. What substantive changes, if any, were made to the policies and/or procedures over time?

In the later period of interest to the Inquiry, those changes required to comply with changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xi. Why were changes made?

In the later period of interest to the Inquiry, to reflect changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xii. Were changes documented?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xiii. Was there an audit trail?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

Present

xiv. With reference to the present position, are the answers to any of the above questions different?

No.

xv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in respect of internal investigations relating to the establishment?

In the later period of interest to the Inquiry, yes. Whilst we do not hold records demonstrating adherence in the earlier period of interest to the Inquiry, we infer that QVS and the MOD adhered to its policy/procedures, given that the MOD, as a Department of State, was required to meet all relevant statutory direction in respect of children at the school.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of the following?

- Approach to/process of internal investigations  
See 4.10.(b).i. above.
- Identifying lessons/changes following internal investigations  
See 4.10.(b).i. above.
- Implementation of lessons/changes following internal investigations  
See 4.10.(b).i. above.
- Compliance  
See 4.10.(b).i. above.
- Response (to child and abuser)  
See 4.10.(b).i. above.
- Response to complaints (including response by organisation and/or establishment)  
See 4.10.(b).i. above.
- External reporting following internal investigations  
See 4.10.(b).i. above.

iii. How was adherence demonstrated?

In the later period of interest to the Inquiry through MOD records or QVS internal records. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- iv. How can such adherence be demonstrated to the Inquiry?

In the later period of interest to the Inquiry through MOD records or QVS internal records. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- v. Were relevant records kept demonstrating adherence?

In the later period of interest to the Inquiry, yes. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- vi. Have such records been retained?

In the later period of interest to the Inquiry, yes (including pupil records). We do not hold records covering the earlier period of interest to the Inquiry.

- vii. If policy/procedure was not adhered to in practice, why not?

N/A.

Present

- viii. With reference to the present position, are the answers to any of the above questions different?

No.

- ix. If so, please give details.

N/A.

#### 4.11 Child Migration

##### (a) Policy

Past

- i. What policies and/or procedures did the organisation/establishment have in place in relation to child migration?

None. As far as we are aware the War Office/MOD had no involvement in child migration.

- ii. Was there a particular policy and/or procedural aim/intention?

N/A.

- iii. Where were such policies and/or procedures recorded?

N/A.

- iv. What did the policies and/or procedures set out in terms of the following?

- Identification and checking the suitability of the places where children were sent

N/A.

- Selection of children to migrate including age, gender and background

N/A.

- Provision of information to the child and/or his/her parents before migration

N/A.

- Provision of information and records to children and/or their parents once child had been migrated

N/A.

- Obtaining consent of child

N/A.

- Obtaining consent of parents of child

N/A.

- Obtaining of consent of others e.g. Secretary of State

N/A.

- Responding to requests for information from former child migrants

N/A.

- Other issues

N/A.

v. Who compiled the policies and/or procedures?

N/A.

vi. When were the policies and/or procedures put in place?

N/A.

vii. Were such policies and/or practices reviewed?

N/A.

viii. If so, what was the reason for review?

N/A.

ix. What substantive changes, if any, were made to the policies and/or procedures over time?

N/A.

x. Why were changes made?

N/A.

xi. Were changes documented?

N/A.

xii. Was there an audit trail?

N/A.

Present

xiii. With reference to the present position, are the answers to any of the above questions different?

No.

xiv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to child migration?

N/A.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of child migrants relating to the following?

- Identification and checking the suitability of the places where children were sent

N/A.

- Selection of children to migrate including age, gender, background

N/A.

- Provision of information to the child and/or his/her parents before migration

N/A.

- Provision of information and records to children and/or their parents once child had been migrated

N/A.

- Obtaining consent of child

N/A.

- Obtaining consent of parents of child

N/A.

- Obtaining of consent of others e.g. Secretary of State

N/A.

- Responding to requests for information from former child migrants

N/A.

- Other issues

N/A.

iii. How was adherence demonstrated?

N/A.

iv. How can such adherence be demonstrated to the Inquiry?

N/A.

v. Were relevant records kept demonstrating adherence?

N/A.

vi. Have such records been retained?

N/A.

vii. If policy/procedure was not adhered to in practice, why not?

N/A.

viii. How many children were sent as child migrants from the organisation's establishments, and where were they sent?

N/A.

ix. What was their age and gender?

N/A.

x. Over what time period were children migrated from the organisation's establishments?

N/A.

xi. Who funded the child migration?

N/A.

xii. Who received the funding in relation to migrant children?



N/A.

xiii. In general terms, how much was this funding?

N/A.

xiv. How did the organisation/establishment respond to requests for information from former child migrants?

N/A.

Present

xv. With reference to the present position, are the answers to any of the above questions different?

No.

xvi. If so, please give details.

N/A.

xvii. In hindsight, does the organisation have a view on policies/procedures that were in place in relation to child migration?

N/A.

xviii. If the organisation accepts that such policies or procedures were flawed, has the organisation provided a specific response e.g. apology, redress or any other type of response?

N/A.

#### 4.12 Records

(a) Policy

Past

i. What policies and/or procedures did the organisation/establishment have in relation to record keeping?

QVS has (or had) a policy of keeping a record of every student who attended the school. Files which remain on each student include details of significant events and/or complaints and the school's response to those complaints. These files currently date back to 1962. Other record keeping would have followed War Office/MOD policy. We are not aware of what policies or procedures were in place in the earlier period of interest to the Inquiry, but would reasonably infer that QVS adhered to any relevant War Office/MOD policies or procedures, and followed educational best practice.

ii. Was there a particular policy and/or procedural aim/intention?

In the later period of interest to the Inquiry, to allow accurate historical record keeping and appropriate record retention. We are not aware of what policies or

procedures were in place in the earlier period of interest to the Inquiry, but would reasonably infer that the aim/intention would have been similar.

iii. Where were such policies and/or practices recorded?

In the later period of interest to the Inquiry, such policies and/or procedures have been recorded in MOD Policy documents and QVS policies. We are not aware where such policies and/or procedures were recorded in the earlier period of interest to the Inquiry, but would reasonably infer that they were also recorded in War Office/MOD policies, and within appropriate QVS policies.

iv. What did the policies and/or procedures set out in terms of records relating to the following?

- Children in its care

In the later period of interest to the Inquiry such MOD and QVS policies and/or procedures set out the requirement to maintain and retain individual pupil records for each pupil. A detailed file continues to be kept on each student, with a record of all discipline matters, complaints and support measures included. We do not have such detail for the earlier period of interest to the Inquiry, but would reasonably infer that they were similar.

- Staff

In the later period of interest to the Inquiry QVS followed MOD policies and/or procedures for the creation, maintenance and retention such records. We do not have such detail for the earlier period of interest to the Inquiry, but would reasonably infer that they were similar.

- Complaints

As for previous bullet.

- Investigations

As for previous bullet.

- Discipline

As for previous bullet.

- Child migrants

N/A.

- Responding to requests from former residents for information/records

In the later period of interest to the Inquiry QVS followed the MOD's policies based on the Access to Personal Files Act of 1987, and subsequent data protection legislation. We do not have such detail for the period before 1987.

- Other issues

N/A.

- v. Who compiled the policies and/or procedures?

In the later period of interest to the Inquiry either by MOD, or by Headteacher/Her Majesty's Commissioners following MOD Policy and relevant statutory guidance and educational/safeguarding best practice. We do not hold documentation demonstrating this for the earlier period of interest to the Inquiry.

- vi. When were the policies and/or procedures put in place?

Such policies and/or procedures were in place during the later period of interest to the Inquiry, but we do not hold documentation from the earlier period of interest to the Inquiry that would confirm implementation dates.

- vii. Do such policies and/or procedures remain in place?

Yes.

- viii. Were such policies and/or practices reviewed?

In the later period of interest to the Inquiry, yes. We do not hold documentation demonstrating this during the earlier period of interest to the Inquiry.

- ix. If so, what was the reason for review?

To reflect changes in statutory direction and professional guidance; and MOD policy.

- x. What substantive changes, if any, were made to the policies and/or procedures over time?

In the later period of interest to the Inquiry, those changes required to comply with changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xi. Why were changes made?

In the later period of interest to the Inquiry, to reflect changes in statutory direction and professional guidance; and MOD policy. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xii. Were changes documented?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- xiii. Was there an audit trail?

In the later period of interest to the Inquiry, yes. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

Present

- xiv. With reference to the present position, are the answers to any of the above questions different?

No.

xv. If so, please give details.

N/A.

(b) Practice

Past

i. Did the organisation/establishment adhere in practice to its policy/procedures in relation to record keeping?

In the later period of interest to the Inquiry, yes. Whilst we do not hold records demonstrating adherence in the earlier period of interest to the Inquiry, we infer that QVS and the MOD adhered to its policy/procedures, given that the MOD, as a Department of State, was required to meet all relevant statutory direction in respect of children at the school.

ii. Did the organisation/establishment adhere in practice to its policy/procedures in terms of record keeping relating to the following?

- Children

See 4.12.(b).i. above.

- Staff

See 4.12.(b).i. above.

- Complaints

See 4.12.(b).i. above.

- Investigations

See 4.12.(b).i. above.

- Discipline

See 4.12.(b).i. above.

- Child migrants

N/A.

- Responding to requests from former residents for information/records

See 4.12.(b).i. above.

- Other issues

N/A.

iii. How was adherence demonstrated?

In the later period of interest to the Inquiry through the making the appropriate records available for review/inspection by appropriate bodies. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- iv. Were relevant records kept demonstrating adherence?

In the later period of interest to the Inquiry through the making the appropriate records available for review/inspection by appropriate bodies. We do not hold documentation showing this for the earlier period of interest to the Inquiry.

- v. Have such records been retained?

Pupil records dating from 1962 have been retained at QVS. Other records have been retained, transferred, or destroyed as required by MOD policy and relevant legislation/professional guidance; retained records can be made available on request.

- vi. If policy/procedure was not adhered to in practice, why not?

N/A.

- vii. Did the establishment undertake any review or analysis of its records to establish what abuse or alleged abuse of children cared for at the establishment may have taken place?

Yes, but limited to those linked to known/historic allegations of abuse.

- viii. If so, when did the reviews take place, what documentation is available, and what were the findings?

Late 2018/early 2019. All detail reflected in Part D of this Statement/Questionnaire.

- ix. How have the outcomes of investigations been used to improve systems, learn lessons?

Where changes were judged to be necessary they were made at the time of the incident/allegation. The informal review in 2018/19 did not identify any measures that had not already been taken at the time.

- x. What changes have been made?

Based on the outcomes of the QVS/MOD/Police investigations, no significant changes were judged to be required.

- xi. How are these monitored?

N/A.

- xii. Did the organisation/establishment afford former residents access to records relating to their time at the establishment?

Yes.

- xiii. If so, how was that facilitated?

Through Subject Access Requests under data protection legislation.

xiv. If not, why not?

N/A.

Present

xv. With reference to the present position, are the answers to any of the above questions different?

No.

xvi. If so, please give details.

N/A.

xvii. Please provide details of any records currently held relating to the establishment in respect of the following:

- Children in its care

QVS currently holds student records from around 1962 onwards. Records include letters from QVS to families and, in latter years, information on discipline matters and responses to any complaints. A file plan is being put in place to deal with file retention and the destruction of records in line with current regulations, but this will not be implemented until the conclusion of the Inquiry.

- Staff

QVS holds basic staff records for existing staff. Full records for existing and former staff are held by MOD Defence Business Services.

- Complaints

The complaints log is available on request from around 2004/5 onwards. It is viewed annually by the Care Inspectorate.

- Investigations

Where held, detail is contained in Pupil Records and/or MOD files, depending on the nature of the investigation.

- Discipline

As above.

- Child Migrants

N/A.

- Responding to requests from former residents for information/records

Subject Access Requests are retained in line with the Data Protection Act 2018.