Proprietary Body

Quality Assurance Framework 2026/27

How the Proprietary Body assures quality, safety, compliance and continuous improvement across our schools

FIRST STEPS TOGETHER
FOR EVERY JOURNEY

Framework owner	Date of Proprietary Body approval	Review date	Version
M Higham	1 Oct 2026	1 Oct 2027	1

Assurance **commitment**

The Proprietary Body is responsible for ensuring each school is safe, well led, compliant and providing a high-quality education.

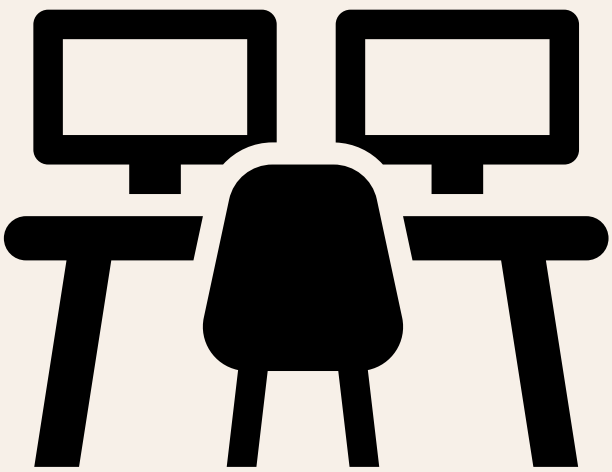
We do this through a planned programme of oversight, direct visits, evidence review, challenge and follow-up. Assurance is based on what is happening in practice, not just on paperwork.

Purpose of framework

This framework explains how First Steps Together, through its Proprietary Body, executive team and independent external review arrangements, gains assurance about the quality and effectiveness of its schools. It is intended to be clear and useful to families, staff, local authorities, commissioners, partners, regulators and other stakeholders.

It sets out the checks we make, the evidence we use, how concerns are escalated and how we know that actions have made a difference. This includes both internal quality assurance activity and independent external scrutiny. The framework complements, rather than replaces, the day-to-day leadership and statutory responsibilities of each school.





Our **quality assurance** principles

PUPIL CENTRED	We start with pupils' safety, wellbeing, needs, experience, learning and outcomes.
TRIANGULATED	We compare records and data with what people tell us and what we observe in practice.
RISK-BASED	Greater scrutiny and support are directed to areas of higher risk, change or concern.
INDEPENDENT CHALLENGE	Executive and Proprietary Body oversight tests leaders' own evaluation rather than simply accepting it.
ACTION-FOCUSED	Findings lead to clear actions, owners and timescales, with follow-up to verify completion and impact.
CONTINUOUS	Assurance takes place across the year. It is not an activity undertaken only for inspection.
PROPORTIONATE	The depth and frequency of review reflect the nature of the assurance question and the level of risk.

How **Proprietary Body assurance** works

Our assurance model is a continuous cycle. Evidence is gathered at school and organisational level, reviewed by the appropriate executive lead, tested through direct quality assurance activity and regular governance dialogue with school leaders, challenged through executive and Proprietary Body arrangements, and followed through until the required standard is secure.

PLAN

Annual and termly priorities, known risks, statutory requirements and previous findings shape our framework.

TEST

Executive audits and visits test specific areas through records/data, targeted questions and direct observation.

JUDGE

Evidence is considered together. Internal RAG judgements help identify good practice or improvements.

ACT

Where improvement is required, actions are assigned to a named owner with a due date and appropriate escalation.

VERIFY

Completion and impact are checked. Significant or overdue matters remain visible until assurance is restored.

REPORT AND LEARN

Executive leaders and the Proprietary Body consider themes, risks, progress, celebrations and emerging concerns through governance meetings and other review arrangements, so that learning informs support, challenge and future priorities.

What we assure

The audit toolkit provides a broad assurance programme aligned to the Independent School Standards (ISS) and the areas that matter most to the quality and safety of an independent SEND school. Different audits are used for different assurance questions; not every area is tested on every visit.

Safeguarding
Safeguarding culture, casework, pupil voice and practice, supported by health and safety and premises assurance.

Leadership and governance
Self-evaluation, improvement impact, standards oversight, capacity, challenge and organisational learning.

Staff culture
Leadership visibility, communication, psychological safety, teamwork, workload and culture.

Curriculum, teaching and learning
Curriculum ambition, breadth, sequencing, implementation, adaptive teaching and the quality of learning.

Inclusion and EHC plans
Barriers to learning, delivery of EHC plan provision, reasonable adjustments, communication, belonging and multi-agency working.

Building, premises and health and safety
Premises suitability, accessibility, statutory checks, risk management, fire, first aid, incidents, contractor controls.

Attendance and behaviour
Attendance, belonging, behaviour,
bullying, suspensions, reduced timetables and restrictive practice.

Personal development
Pupils' wider development, wellbeing,
preparation for adulthood and participation.

Information and complaints
Required information, accessibility, publication accuracy, complaints handling, themes and learning.

Alternative provision
Due diligence, safeguarding, attendance, curriculum, SEND support, progress and accountability where off-site provision is used.

Who provides assurance

Assurance is distributed across the executive team so that review is led by colleagues with relevant organisational responsibility.

The annual executive audit calendar is designed so that each school receives a half-day executive audit once per year, with visits distributed across the year.

Internal audits are complemented by independent external quality assurance reviews, providing additional scrutiny, challenge and verification of school effectiveness.

Where an executive has more than one audit area, they visit a school twice during the year, once for each area.



KATIE HIGHAM

Head of Finance

- 90-minute Staff Culture
- Alternative Provision

SUE RICHARDSON

Quality Assurance Manager and Health and Safety Lead

- 90-minute Safeguarding Visit
- Inclusion and EHC plans

NATALIE OGDEN

Director of Growth, Strategy and Quality

- Teaching and Learning
- Curriculum Design
- Progress and Outcomes

NICK LEDGER

Business Manager

- Attendance and Behaviour
- Personal Development

JACOB BOND

Head of People Services

- Building and Premises
- Leadership and Governance

TAYYABA AHMED

Director of Education

- Health and Safety Compliance
- Information and Complaints

Governance and **leadership assurance**

Alongside the planned executive audit programme, members of the Proprietary Body attend governance meetings with school leaders throughout the year.

These meetings provide a regular forum for direct professional dialogue, support and challenge and are an important part of how the Proprietary Body maintains an up-to-date view of each school.

Governance discussions consider the school in the round, including emerging concerns, strengths and achievements, priorities and future plans, progress against school and organisational action plans, findings from external reviews, and matters requiring additional support, challenge, monitoring or escalation.

This means Proprietary Body assurance is not dependent on a single annual visit, external review or written report. The Proprietary Body can hear leaders' evaluation directly, ask questions, consider whether planned actions are having the intended impact, recognise effective practice and identify where further assurance is required.

Where a concern or risk emerges through governance, executive audit activity or independent external review, the response can include additional scrutiny, targeted support, an amended action plan, closer monitoring or escalation through the appropriate governance route. Progress remains visible until sufficient assurance has been obtained.

The Proprietary Body maintains direct and continuing oversight of each school through governance meetings, scrutiny of executive assurance reports, consideration of school performance information and review of findings from quality assurance activity.

Members do not rely solely on assurances provided by school or executive leaders. They test the reliability of those assurances through professional challenge, examination of supporting evidence, consideration of emerging risks and, where necessary, commissioning further scrutiny or verification.

Through these arrangements, the Proprietary Body seeks to establish:

- Whether each school is meeting the Independent School Standards and its statutory responsibilities.
- Whether safeguarding arrangements are effective in practice and pupils are safe.
- Whether the curriculum, teaching and provision are meeting pupils' individual needs, including their EHC plans.
- Whether school leaders understand their strengths, weaknesses and improvement priorities.
- Whether identified risks are being managed effectively and improvements are being secured.
- Whether previous actions have resulted in demonstrable improvements in practice and outcomes.

Where the evidence does not provide sufficient assurance, the Proprietary Body requires further investigation, additional support, increased monitoring or corrective action.

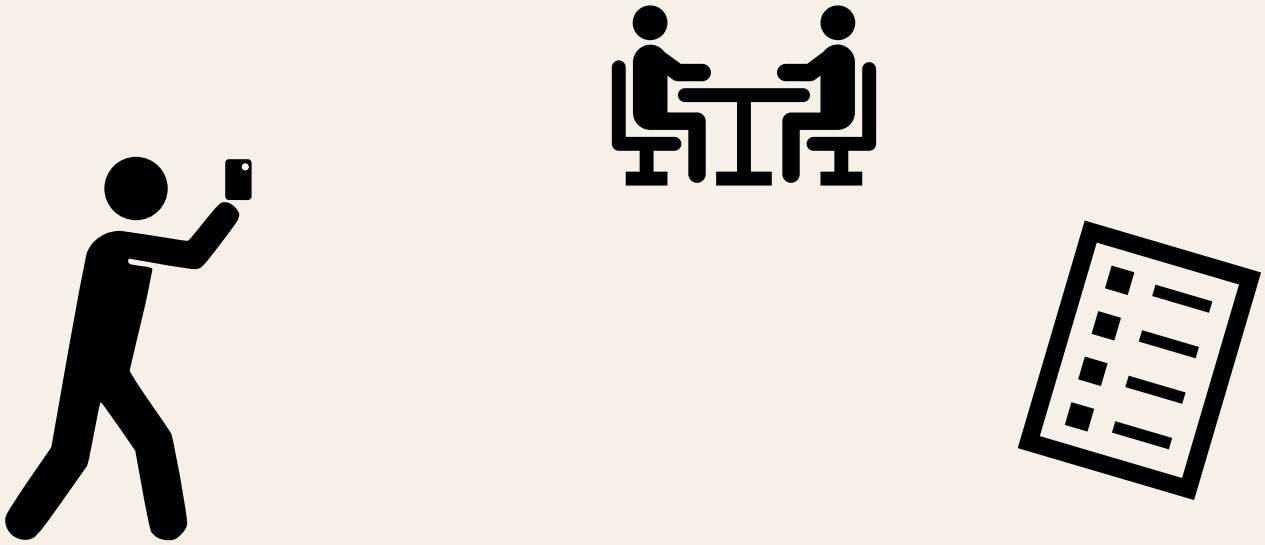
Significant concerns and outstanding actions remain subject to governance oversight until sufficient evidence is available to confirm that the required improvements have been secured.

What counts as **assurance evidence**

A single document, conversation or data point is not normally enough to provide assurance. Our audits deliberately triangulate evidence from three sources:

- **Records and data:** for example policies, plans, case records, attendance, progress information, compliance registers, incident records, action logs.
- **People's experience:** targeted discussion with leaders, staff, pupils and, where appropriate, families or partners.
- **Practice:** direct observation of what happens in the school, including the environment, routines, interactions, teaching and the implementation of agreed controls.

The reviewer records the evidence considered, identifies strengths and risks, and agrees any required action. The emphasis is on whether arrangements are effective in practice and whether they make a positive difference for pupils.



The annual **assurance cycle**



Escalation, scrutiny and decision-making

The Proprietary Body maintains oversight of significant risks, concerns and areas requiring improvement through a clear process of identification, escalation, challenge, action and verification.

Identification and initial response

Concerns may be identified through school leadership monitoring, monthly assurance reports, executive audits, termly quality assurance and development visits, governance meetings, complaints, safeguarding activity or other sources of information.

The Headteacher is responsible for taking appropriate immediate action at school level, including safeguarding pupils, addressing urgent risks and informing the relevant executive lead.

Where a concern is identified through executive assurance activity, the reviewing executive is responsible for ensuring that the concern is communicated to the Headteacher and the relevant organisational lead.

Escalation and decision-making

RAG (Red, Amber, Green) is an internal management tool for decision-making, not an inspection grade. Any unmet statutory requirement or serious safeguarding concern takes precedence over an overall RAG judgement and is escalated immediately.

Actions are tracked to closure and reviewers revisit impact, not simply whether a task has been marked complete. The next page details the procedure for each RAG outcome.



Where evidence demonstrates that the required standards are being met, routine school leadership monitoring, executive oversight and scheduled quality assurance activity continue.



Where weaknesses, emerging risks, inconsistent practice or gaps in evidence are identified, the Headteacher and relevant executive lead agree an improvement action plan with named responsibilities, timescales and arrangements for verification.

The Director of Education maintains oversight of educational and school-level improvement concerns, supported by the relevant specialist executive lead.

Amber concerns are considered through monthly assurance reporting and governance arrangements. Additional scrutiny is commissioned where concerns persist, risks increase or agreed actions do not secure sufficient improvement.



Where a significant risk, serious weakness or material compliance gap is identified, the matter is escalated promptly to the Director of Education and the appropriate Proprietary Body representative.

The relevant executive lead ensures that immediate protective or corrective measures are implemented and that a documented action plan identifies the risk, required action, responsible person, timescale and arrangements for verification.



The Proprietary Body considers the seriousness of the concern, challenges the adequacy of the proposed response and determines whether additional oversight, specialist support, further investigation or more frequent reporting is required.

Serious safeguarding concerns, immediate threats to safety or unmet statutory requirements are acted upon and escalated immediately through the appropriate safeguarding, statutory or regulatory procedures, irrespective of the overall RAG judgement.

Triggers for additional Proprietary Body scrutiny

Additional scrutiny may be required where:

- A significant safeguarding, welfare, health and safety or compliance concern is identified
- Evidence indicates that an Independent School Standard may not be met
- A school receives a *Red* assurance judgement
- An *Amber* concern persists or deteriorates
- Significant improvement actions are overdue or have not secured the intended impact
- Monthly reports, internal or external audits, visits or school self-evaluation provide conflicting or insufficient evidence
- Complaints, incidents, attendance, behaviour or pupil outcomes indicate an emerging pattern of concern
- Changes in leadership, staffing, provision or school circumstances create additional risk

External **independent assurance** reviews

First Steps Together has an established programme of independent external quality assurance reviews across all schools, undertaken by a team of experienced education professionals, including a former Ofsted inspector.

These reviews will provide an additional layer of objective scrutiny, professional challenge and assurance, complementing the organisation's existing internal quality assurance arrangements.

Reviews will assess key aspects of school effectiveness, including safeguarding, leadership, statutory compliance, the quality of education, SEND provision, behaviour, physical intervention, incident reporting and policy implementation.

Findings and recommendations will be shared with the Proprietary Body and relevant school leaders, with any identified areas for improvement incorporated into school and organisational improvement plans.

Progress against recommendations will be monitored through the existing quality assurance and governance arrangements to ensure that improvements are implemented and sustained.

This external review programme will strengthen transparency, accountability and continuous improvement across First Steps Together.









Monitoring, verification and closure

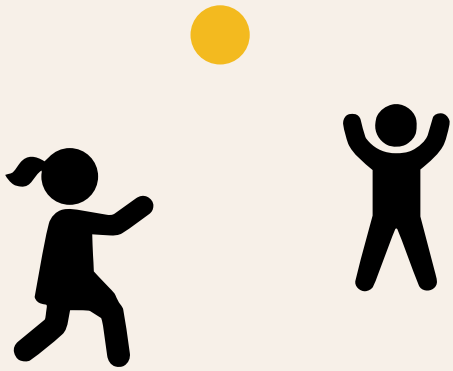
The relevant executive lead monitors progress against agreed actions and reports significant developments through the established executive and governance arrangements.

The Proprietary Body reviews the evidence of improvement, challenges any continuing weaknesses and determines whether further assurance is required.

Actions are not considered fully resolved solely because a task has been completed. Closure requires evidence that the identified concern has been addressed and that the necessary improvement is effective in practice.

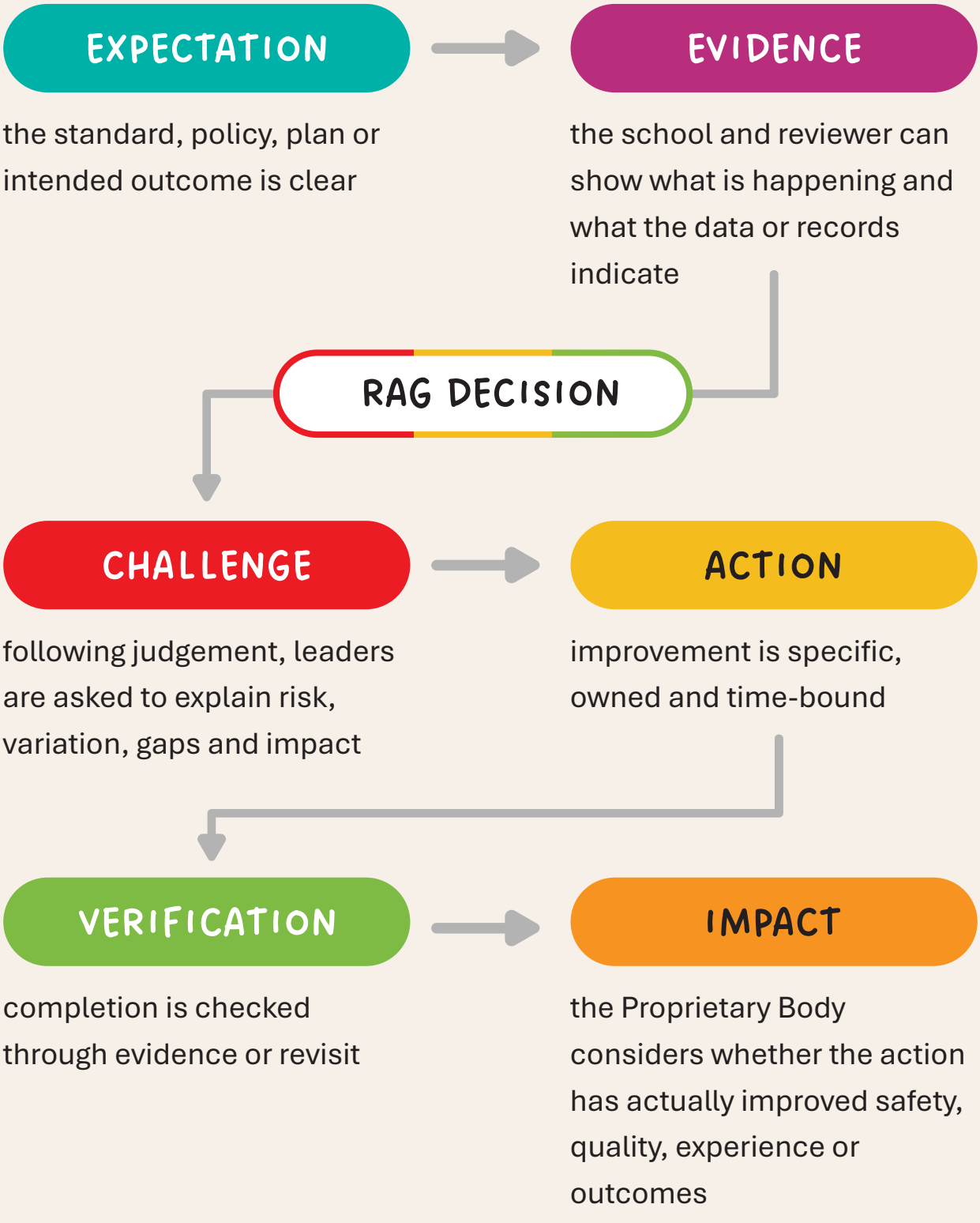
Significant matters remain visible to the Proprietary Body until sufficient assurance has been obtained that risks are appropriately controlled, required standards are met and improvements are sustained.





The **assurance trail**

For any area of quality or compliance, stakeholders should be able to follow a clear line of sight from expectation to impact:



School-by-school assurance

The framework applies across all eight First Steps Together schools:

- Kershaw Wood Dukinfield
- Kershaw Wood Glossop
- Kershaw Wood Manchester
- Mount Havelock
- Peak Forest
- Tame Bank
- The Hub
- The Watkin

At school level, assurance considers whether the school is safe and operational, appropriately staffed, meeting pupils' needs, delivering suitable education, maintaining compliant premises and services, and addressing financial, contractual or other material risks.

Where action is needed, the process identifies what is required, who owns it, the deadline and who will verify completion.



Accountability and **transparency**

The Proprietary Body retains overall responsibility for ensuring that the Independent School Standards are met consistently and that pupils' wellbeing is actively promoted. Executive assurance supports that responsibility; it does not transfer it away from the Proprietary Body or from school leaders.

This framework is therefore both an internal quality system and a transparent explanation of how First Steps Together holds itself to account. It can be shared with parents and carers, local authorities, commissioners, partners and regulators to explain how quality, compliance and improvement are overseen across the organisation.

What stakeholders can expect from us

- A planned and proportionate programme of quality assurance across every school
- Direct executive visibility of school practice, not reliance on self-report alone
- Evidence drawn from data, records, people's experience and observation.
- Clear ownership and deadlines where improvement is needed
- Escalation of significant safeguarding, statutory or operational concerns
- Follow-up that checks impact as well as task completion
- Governance oversight of material risks, themes and progress
- Internal quality assurance complemented by independent external review
- Regular direct dialogue between the Proprietary Body and school leaders about emerging concerns, celebrations, plans and action-plan progress
- A commitment to learn across schools and strengthen practice over time

Monthly **evidence-based** assurance reports

Three structured monthly reports form a standing line of assurance for each school. They cover the previous calendar month and are due by the 1st of the following month. These reports supplement, rather than replace, direct visits, governance scrutiny and immediate safeguarding or safety escalation.

Monthly School Education Assurance Report

The Director of Education completes a separate return for each school. It records evidence-based RAG judgements, monitoring undertaken, concerns, actions, owners and deadlines across the Independent School Standards, leadership, quality of education, SEND/EHCP provision, safeguarding, attendance, behaviour, school improvement and regulatory assurance. It includes formal Headteacher accountability meetings, attendance and absence patterns, complaints, reduced timetables and alternative provision, with supporting evidence and a declaration of challenge and accuracy.

Monthly School Premises & Buildings Assurance Report

The Quality Assurance Team completes one return per school, including the date and outcome of the latest on-site premises inspection (or the reason and alternative assurance if not completed). It examines suitability, accessibility, toilets and washing facilities, medical accommodation, building condition, lighting, water, external areas, fire arrangements, statutory inspections, defects and maintenance. Risks, interim controls, named owners, deadlines, overdue actions and decisions needed from the Proprietary Body are recorded.

Monthly Safer Recruitment & Staff Suitability Assurance Report

The designated Safer Recruitment / HR Compliance Lead completes a separate return per school. It covers recruitment procedures, required pre-employment and suitability checks, supply staff, checks relevant to the Proprietary Body and leadership, the Single Central Record, safeguarding induction and training, independent checking, professional challenge and follow-up. Missing checks and suitability concerns must be managed immediately through appropriate procedures, not deferred until the monthly return.

The reports provide a regular written evidence trail: what was checked, what evidence was seen, the assurance judgement, what remains uncertain, the corrective action and who is accountable. Executive and Proprietary Body scrutiny should identify patterns across schools, test the basis of assurance, challenge overdue actions and commission verification or additional support as necessary. A completed form is evidence of reporting, not by itself proof of compliance.



Proprietary Body review of monthly assurance

Monthly assurance returns provide a structured evidence base through which the Proprietary Body can maintain oversight of standards, safeguarding, operational compliance and emerging risks across all schools.

The reports are reviewed through executive and governance arrangements to identify:

- Significant or recurring areas of concern
- Statutory requirements where compliance is not sufficiently evidenced
- Variations in performance or practice between schools
- Actions that are overdue or have not delivered the intended improvement
- Areas where additional scrutiny, support or resources may be required.
- Positive practice that should be recognised and shared across the organisation

The Proprietary Body challenges the evidence supporting assurance judgements and seeks clarification where information is incomplete, inconsistent or indicates increasing risk.

Where additional assurance is required, this is recorded with an identified responsible person, an agreed timescale and arrangements for reporting progress.

The monthly reporting process therefore provides more than a record of compliance activity. It enables the Proprietary Body to identify risk, challenge performance, direct improvement and maintain oversight of the effectiveness of corrective action.

Termly school **quality assurance** and **development visits**

In addition to the monthly returns and annual executive specialist audit programme, a collaborative School Quality Assurance and Development Visit is planned for every school each term. Led through the Proprietary Body oversight arrangements, the visiting team includes school leaders working across schools to provide professional challenge, share expertise, recognise strengths and identify support and improvement priorities. These visits are developmental and evidence-led, not inspection grades.

Visits use the School Audit Toolkit as a focused tracker. Reviewers consider relevant prompts, questions, suggested evidence and observations, and record findings, internal RAG ratings, gaps in assurance and actions. The visit combines records and data, conversations with staff and pupils, and direct observation; it does not require every toolkit tab to be completed on every visit.

Our plan illustrates a clear model: a staff and pupil meet-and-greet; safeguarding case sampling; attendance and behaviour analysis; leadership and governance discussion; curriculum, teaching, assessment and book scrutiny; staff voice; and sampled EHCP provision.

The team meets to triangulate findings and agree named actions and deadlines, followed by feedback to school leadership. Urgent safeguarding or safety issues are escalated immediately. Subsequent visits and monthly reporting provide opportunities to check progress and impact.

Proprietary Body oversight of visit findings

Findings from termly School Quality Assurance and Development Visits contribute directly to the Proprietary Body's understanding of each school's strengths, risks and improvement priorities.

The Proprietary Body considers whether findings are consistent with the school's self-evaluation, monthly assurance reports and previous audit outcomes. Where evidence is contradictory or assurance remains incomplete, further scrutiny may be required.

The Proprietary Body also considers whether agreed improvement actions are proportionate to the risks identified and whether subsequent monitoring demonstrates sustained improvement.

This ensures that visits contribute to a continuing cycle of assurance and improvement rather than operating as isolated review activities.



Recording and **demonstrating** Proprietary Body assurance

The Proprietary Body maintains an evidence-based record of its oversight, challenge and decision-making through governance arrangements and the organisation's quality assurance systems.

This includes, as appropriate:

- Records of governance discussions, questions, challenge and decisions
- Executive and school-level assurance reports
- Findings from audits, quality assurance visits and independent external reviews
- School improvement and organisational action plans
- Risk assessments, escalation records and follow-up actions
- Evidence demonstrating that corrective actions have been implemented and their impact evaluated

The Proprietary Body considers the collective evidence available when determining whether sufficient assurance has been obtained. Where evidence is incomplete, concerns remain unresolved or improvement has not been sustained, further assurance activity is required.

This creates a demonstrable line of accountability from the identification of a concern through to the Proprietary Body's consideration of evidence, direction of action and confirmation that the required improvement has been achieved.

Together these strands create a cycle of oversight: routine monitoring identifies issues; governance and executive leaders challenge the evidence; termly visits test practice directly; specialist audits examine particular risks; actions are tracked and checked for impact. Significant concerns are escalated as they arise, without waiting for the next scheduled meeting, report or visit.

Supporting **assurance instruments**

- Monthly School Education Assurance Report (Microsoft Forms)
- Monthly School Premises & Buildings Assurance Report (Microsoft Forms)
- Monthly Safer Recruitment & Staff Suitability Assurance Report (Microsoft Forms)
- Independent External Quality Assurance Review Reports and associated improvement action plans
- School Quality Assurance and Development Visit communications and School Audit Toolkit
- Executive Team Audit Calendar 2026/27

These named instruments should be held alongside the framework in the organisation's controlled assurance records. The supplied PDFs are copies of the reporting templates; no live Microsoft Forms URLs or School Audit Toolkit workbook were supplied for embedding as clickable links.

How the **assurance strands connect**

Assurance strand	Frequency / reach	Contribution to Proprietary Body assurance
School leadership and governance meetings	Throughout the year	Emerging risks, successes, school plans, action plans, challenge and escalation
Three structured assurance returns	Monthly; each school	Education, premises and safer recruitment evidence, exceptions, actions and decisions
Quality assurance and development visits	Termly; every school	Cross-school peer review, observation, triangulation, feedback and improvement
Executive specialist audit calendar	Scheduled across 2026/27	Focused half-day reviews of allocated specialist areas at each school
Follow-up and verification	Risk-led and ongoing	Confirmation that action has been completed and improved practice or outcomes
External independent quality assurance reviews	Ongoing programme of independent external reviews across all schools	Independent scrutiny, constructive challenge and verification of school effectiveness

Proprietary Body **quality assurance statement**

“The Proprietary Body of First Steps Together accepts and retains overall accountability for ensuring that its schools meet the Independent School Standards, safeguard and promote the welfare of pupils, and provide a high-quality education that meets pupils' individual needs.

The Proprietary Body discharges its oversight responsibilities through a comprehensive and continuous programme of quality assurance, including monthly evidence-based reporting, termly school quality assurance and development visits, specialist executive audits, independent external quality assurance reviews, direct governance engagement with school leaders and ongoing scrutiny of school improvement activity

Assurance is not based solely on written reports or assurances provided by school leaders. The Proprietary Body expects evidence to be tested through scrutiny of records and data, professional challenge, direct observation and consideration of the experiences and outcomes of pupils.

Where concerns, weaknesses or gaps in compliance are identified, the Proprietary Body expects timely corrective action, clear accountability, appropriate escalation and evidence that the required improvements have been secured.

Through these arrangements, the Proprietary Body maintains an informed understanding of the effectiveness of its schools, challenges leaders where necessary, recognises and shares effective practice, and ensures that identified risks and improvement priorities remain subject to appropriate oversight.

The purpose of this framework is not simply to demonstrate that quality assurance activity takes place, but to establish how the Proprietary Body knows that its schools are safe, compliant, well led and continually improving the education and experiences of their pupils.

Framework basis

This framework is supported by the First Steps Together School Audit Toolkit, executive audit calendar and executive readiness questions for 2026/27. The audit toolkit maps assurance activity to the Independent School Standards and the Ofsted non-association independent-school framework, while retaining quality assurance as an ongoing organisational responsibility rather than an inspection-preparation exercise.

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