



The PGS Risk Assessment Policy (including Risk Assessment for Pupil Welfare)

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The PGS Risk Assessment Policy

1. Introduction

This guidance is applicable to all those with responsibility for undertaking Risk Assessments for activities which are under their control. It should be read in connection with the policies listed at the end of this document.

Ensuring the welfare of pupils and others such as staff and visitors is central to this and other policies. In this respect, safeguarding and promoting welfare is always a key consideration and is everyone's responsibility. For example, to fulfil this responsibility effectively in respect of children, all staff should make sure their approach is child centric: this means constantly considering the best interests of the child, identifying concerns early, providing help and support, promoting their welfare and preventing concerns escalating.

2. Objectives

This guidance has the following key objectives:

- 2.1. to assist in ensuring the welfare of pupils, members of the school community and visitors to the school.
- 2.2. to ensure that suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk.
- 2.3. to ensure that identified control measures are implemented to control risk so far as reasonably practicable.
- 2.4. to ensure that those affected by school activities have received suitable information on what to do when involved in running or supporting a school trip.
- 2.5. to ensure that risk assessments are recorded and reviewed when appropriate.

3. Regulatory Framework

- 3.1. It is a requirement of the Independent Schools Standard Regulations that a written Risk Assessment Policy is in place to meet the requirement for leadership in and management of schools including the Early Years Foundations Stage.
- 3.2. In so far as this policy relates to pupil welfare¹, this policy is drawn up and implemented in accordance with:
 - 3.2.1 Keeping Children Safe in Education (September 2024 or latest version) which is a key document for promoting the safeguarding and welfare of pupils and it is "essential that everybody working in a school understands their safeguarding responsibilities".

¹ This policy draws upon *The Risk Assessment Policy for Pupil Welfare* published and offered as guidance by ISBA (the Independent Schools' Bursars Association) Reference Library October 2021

- 3.2.2 the Independent School Standards (the standards) in the schedule to the Education (Independent School Standards) Regulations 2014 (ISSR) (April 2019 and as updated) with particular regard to:
- (a) Part 3 obligations of the Governing Body that “arrangements are made to safeguard and promote the welfare of pupils at the school; and such arrangements have regard to any guidance issued by the Secretary of State”.
 - (b) the implementation of a written risk assessment policy
 - (c) Part 8 obligations of those with leadership and management roles to actively promote the wellbeing of pupils noting that “the welfare of pupils at the school is safeguarded and promoted by the drawing up and effective implementation of a written risk assessment policy; and appropriate action is taken to reduce risks that are identified”.
- 3.2.3 the Statutory Framework for the Early Years Foundation Stage (EYFS) (updated 1 November 2024), made under the Childcare Act 2006 is mandatory for all early years providers.
- 3.3. The EYFS framework specifically requires the school to have regard to KCSIE 2024 (or later version) and to the Prevent duty guidance (updated March 2024) in addition to Working Together to Safeguard Children (updated Feb 2024) [paragraph 3.7].
- 3.4. In so far as this policy relates to Health & Safety more generally, this policy is drawn up and implemented in accordance with the Health and Safety at Work Act 1974 (as updated) and with ('Welfare, Health & Safety of Pupils) - the School has a duty to ensure the health, safety and welfare of employees and the health and safety of pupils and others affected by the School's operations, so far as is reasonably practicable. The School has a duty to ensure the health, safety and welfare of employees and the health and safety of pupils and others affected by the School's operations, so far as is reasonably practicable.

4. Responsibilities

- 4.1. The Governors have overall responsibility for safeguarding and promoting welfare and well-being at the School including the delivery of EYFS
- 4.2. At an operational level, the Senior Deputy Head, working in conjunction with the Estates & Operations Bursar (as detailed in the Allocation of Tasks table on page 13), will ensure:
- 4.2.1 that all staff are aware of, and adhere to, the School's policies and procedures on health, safety and welfare
 - 4.2.2 that key staff have clearly established roles and responsibilities
 - 4.2.3 that in respect of welfare:
 - (a) staff are appropriately trained to deal with welfare issues
 - (b) that where concerns for welfare are identified, the risks are appropriately managed

- (c) that staff, pupils, parents and others are consulted, where appropriate, to find practical solutions to welfare issues
 - (d) that standards of welfare at the School are regularly monitored both at an individual level and generally to identify trends and issues of concern and to improve school management systems.
- 4.3. Those named in paragraph 6.2.4 are responsible for carrying out risk assessments in relation to the specific matters of pupil health, safety and welfare in the named policies.
- 4.4. Senior Managers, Heads of Department and other key organisers of activities are responsible for the implementation of the guidance in this policy, supported by key staff as appropriate. For example:
- 4.5. Whole school:
 - 4.5.1 the Estates & Operations Bursar for Health and Safety matters
- 4.6. Junior School:
 - 4.6.1 The Deputy Head (Pastoral) for pastoral matters & pupil welfare
 - 4.6.2 the Head of the Junior School for staff welfare
 - 4.6.3 the Deputy Head (Operations & Logistics) for trips
 - 4.6.4 the Enrichment Co-ordinator for all co-curriculum activities
- 4.7. Senior School:
 - 4.7.1 the Senior Deputy Head and Deputy Head (Pastoral) for pastoral matters and pupil welfare
 - 4.7.2 the Deputy Head (Academic and Staff Welfare) for staff welfare
 - 4.7.3 the Surmaster for trips
 - 4.7.4 the Assistant Head (Co-Curricular) for all co-curriculum activities

5. Risk assessment principles

5.1. The following general principles apply:

- 5.1.1 Where a concern is identified, the risks will be assessed, appropriate action will be taken to reduce the risks identified, which will be recorded and then regularly monitored and reviewed.
- 5.1.2 The format of risk assessment may vary and may be included as part of the School's overall response to an issue or using a risk assessment similar in form to that shown at Annex A. Regardless of the form used, the School's approach will be systematic with a view to promoting welfare and will run through the stages identified in paragraph 5.3.
- 5.1.3 The information obtained through this process and the action agreed will then be shared, as appropriate, with other staff, parents and third parties in order to safeguard and promote the welfare and health & safety more generally.
- 5.1.4 Risk assessments should be electronic and stored and Assessments relating to individual pupils will be held on their pupil records and electronically on [MIS System], with equivalent systems in place for staff and visitors too as appropriate.

5.2. Risk Assessments will take into account:

- 5.2.1 Hazard: something with the potential to cause harm
- 5.2.2 Risk: an evaluation of the likelihood of the hazard causing harm and may involve, if appropriate, a rating assessment of the severity of the outcome of an event
- 5.2.3 Control measures: physical measures and procedures put in place to mitigate the risk to an acceptably low level

5.3. The Risk Assessment process will normally consist of the following actions:

- 5.3.1 Identify the issue/risk
- 5.3.2 Decide who might be harmed and how
- 5.3.3 Evaluate the risks and decide on precautions:
 - (a) Evaluate the severity of the outcome of an event
 - (b) Identify and describe the physical control measures and procedures put in place to mitigate the risk to an acceptably low level
 - (c) Ensure all those with responsibility for the activity are aware of the risks
- 5.3.4 Record findings and implement them
- 5.3.5 Review the risk assessment regularly and update if necessary

5.4. Risk Assessments are to be reviewed on the following occasions:

- 5.4.1 When there are changes to the activity
- 5.4.2 After a near miss or accident
- 5.4.3 When there are changes to the type or number of people involved in the activity
- 5.4.4 If there are changes to a pupil's (or group of pupils') circumstances, or if a pupil's circumstances merit review e.g. in response to a bullying allegation
- 5.4.5 When there are changes in good practice
- 5.4.6 When there are legislative changes
- 5.4.7 Annually if for no other reason

6. Guidance relating to Risk Assessment in specific areas

- 6.1. This guidance is applicable to general Risk Assessment. Where specialist skills are required, e.g. asbestos, fire, water quality and hazardous substances, there are separate arrangements in place. Similarly, separate guidance exists for teaching area Risk Assessment. The school uses a variety of template documents to support its risk assessments for both on-site and off-site activities and further reference is made to them in the related policies referred to at the end of this guidance.

Key specific areas of focus include the following:

6.2. **Pupil welfare** (see also Appendix A)

- 6.2.1 The School recognises its responsibility to safeguard and promote the welfare of pupils in its care. This responsibility encompasses the following principles to:
- (a) support pupils' physical and mental health and emotional wellbeing (as well as their social and economic wellbeing)
 - (b) protect pupils from maltreatment, harm and neglect
 - (c) recognise that corporal punishment can never be justified
 - (d) provide pupils with appropriate education, training and recreation
 - (e) encourage pupils to contribute to society
 - (f) ensure that pupils are provided with safe, healthy and effective care
 - (g) improve the physical environment of the School and provision for disabled pupils
 - (h) manage welfare concerns effectively
 - (i) support local authorities, social workers and other agencies following any referral.
- 6.2.2 In relation to pupil welfare careful reference should be made to The PGS Safeguarding and Child Protection Policy, KCSIE and other relevant guidance, as well as Appendix A to this policy.

6.2.3 By way of example, the school addresses its commitment to pupil welfare through:

- (a) **Prevention** - ensuring that all reasonable measures are taken to minimise the risks of harm to pupils and their welfare by:
 - (i) ensuring through training that all staff are aware of and committed to this policy and the values set out in associated policies
 - (ii) establishing a positive, supportive, safe and secure environment in which pupils can learn and develop
 - (iii) providing a curriculum, activities and opportunities for PSD which equip pupils with skills to enable them to protect their own welfare and that of others
 - (iv) offering accessible medical and pastoral support that is available to all pupils.
- (b) **Protection** - ensuring all appropriate actions are taken to address concerns about the welfare of a pupil, whether of a safeguarding nature or otherwise. This includes:
 - (i) sharing information and concerns with agencies who need to know
 - (ii) involving pupils and their parents appropriately.
 - (iii) monitoring pupils known or thought to be at risk of harm and formulating and / or contributing to support packages for those pupils.

The School has developed this policy and the policies in the table below, which set out full details of its procedures to safeguard and promote pupil health, safety and welfare in accordance with its duties under Part 3 of the ISSRs:

Policy	Responsibility
Child Protection	Designated Safeguarding Lead
Anti-bullying including cyberbullying	Deputy Head (Pastoral)
Behaviour and Discipline	Senior Deputy Head
Health and Safety Policy	Estates & Operations Deputy Bursar
First Aid Policy	Deputy Head (Pastoral)
Administration of Medicines / Health Care	Nursing Team
Supervision (tbc)	Senior Deputy Head overview, with some aspects delegated to SMT colleagues
Educational Visits Policy	Surmaster

- (c) **Safeguarding / Child Protection:** With regards to safeguarding risks, and in accordance with current statutory guidance, including Keeping Children Safe in Education 2024 (or as updated) and Working Together to Safeguard Children (updated 2024 or later version) and Part 3 of the ISSR (Welfare, Health & Safety of pupils) (April 2019 or later version), the School has systems in place to identify pupils who may be in need of extra help, or those who are suffering, or are likely to suffer significant harm, and will take appropriate action to address and mitigate those risks by working in conjunction with social care, the Police, health services and other services, where necessary.

Full details of the School's safeguarding procedures are in the *PGS Safeguarding and Child Protection Policy*.

- (d) **Anti-Bullying:** The School has a written Anti-bullying Policy which covers the School's approach to the management of bullying and cyber bullying.
- (e) **Behaviour:** The School has a Behaviour Management Policy which includes a low-level concerns policy and how to promote good behaviour amongst pupils and the sanctions to be adopted in the event of pupil misbehaviour.

This policy contains further information about the School's performance of its duties under the Equality Act 2010 (and reasonable adjustments made for pupils with educational needs/disabilities), support systems for pupils and liaison between parents and other agencies.

- (f) **Health and Safety:** In accordance with its obligations under the Health and Safety at Work Act 1974 and with Part 3 of the ISSR (Welfare, Health & Safety of pupils) (April 2019 or later version), the School has a duty to ensure the health, safety and welfare of employees and the health and safety of pupils and others affected by the School's operations, so far as is reasonably practicable.
The School will do so by taking a sensible, proportionate and holistic approach to management of health and safety issues in accordance with the School's obligations and its health and safety policies set out at paragraph 10.
The Health and Safety policy includes 'Young People at Work' and relates to young people employed by [the school].

6.3. A non-exhaustive list of areas which typically require specific Risk Assessment is as follows:

Educational including Co-Curriculum areas:

- 6.3.1 Science experiments
- 6.3.2 Design & Technology
- 6.3.3 Food technology
- 6.3.4 Sport and PE activity
- 6.3.5 Outdoor Pursuits including Duke of Edinburgh Award
- 6.3.6 Art
- 6.3.7 CCF
- 6.3.8 Music
- 6.3.9 Drama & Dance
- 6.3.10 All off site trips and activities
- 6.3.11 Some classroom activities

Support areas:

- 6.3.12 Catering and food hygiene (with contract caterers)
- 6.3.13 Cleaning
- 6.3.14 Caretaking and security
- 6.3.15 Maintenance
- 6.3.16 Grounds
- 6.3.17 Offices
- 6.3.18 Lettings

Other:

6.3.19 Prevention of radicalisation and extremist ideology

7. Induction and Training

All teaching staff will receive guidance on risk assessment as part of their induction. Support staff will be provided with training on risk assessments as required.

Training will be refreshed on a regular basis and staff should feel able to ask for further guidance at any stage.

8. Associated Document and Policies

The school has referred to the following documents in the preparation of this guidance, particularly document 8.6 below:

- 8.1. Handbook for the Inspection of Schools - The Regulatory Requirements, Part 3 (www.isi.net)
- 8.2. Health & Safety Executive, Five steps to risk assessment (www.hse.gov.uk/risk/fivesteps.htm)
- 8.3. Early Years Foundation Stage Statutory Framework
(<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>)
- 8.4. Charities and Risk Management, The Charities Commission (www.charity-commission.gov.uk)
- 8.5. PGS Policies – Trips Policy, Health and Safety at PGS and Organisation for Health and Safety, Critical Incident Plan and associated documentation.
- 8.6. ISBA Risk Assessment Policy for Pupil Welfare template – October 2021 – Reference Library

The school also adopts the CLEAPSS Advisory Service Model Risk Assessments for lessons in Science and Design & Technology.

Annex A – Exemplar Guidance on preparing Pupil Welfare Risk Assessments, as applied to PGS Individualised Pupil Risk Assessments

1. An Individual Pupil Risk Assessment is a careful examination of what could cause harm to pupil welfare and appropriate mitigation measures to ensure the School has taken adequate precautions or should do more to prevent harm.
2. The purpose of a Risk Assessment is to identify sensible measures to control risks that are most likely to occur and / or will cause harm.
3. When thinking about your risk assessment in this context, remember:
 - a. a risk to pupil welfare is anything that may harm a pupil including cyber-bullying or abuse
 - b. any risk, however slight, that a pupil may be harmed must be assessed in full.
 - c. **Step 1: Identify the issue/risk**
 - (1) First you need to work out how pupils could be harmed. This will generally be set out in the concern raised about a pupil's welfare.
 - (2) If the issue/risk is associated with a member of staff, consider the level of concern and whether it meets the “harm threshold” in KCSIE

Step 2: Decide who might be harmed and how

- (1) Identify individual pupils or groups who might be harmed/at risk and how they might be at risk based on the concern raised.
- (2) Consider seeking early advice from the local authority designated officer (LADO).

Step 3: Evaluate the risks and decide on precautions

- (1) Decide what to do about the risks. The extent of the risk will depend on the likelihood of the harm occurring and the seriousness of the harm.
- (2) The effectiveness of controls should be considered and the extent of risk remaining assessed. When deciding if mitigation measures are acceptable, the assessor should take into account the legal requirement to do all that is “reasonably practicable” to protect people from harm.
- (3) If the remaining risk is unacceptable then further controls must be identified to further reduce risk. Where further action is necessary an action plan should include:
 - (a) name of employee responsible for completing the action
 - (b) target date for completion
 - (c) any interim measures to reduce risk in the short term
 - (d) confirmation that the action has been completed

- (e) reassessment of the level of risk following completion of the action.

Step 4: Record your findings and implement them

- (1) Make a written record using the template risk assessment below – the concerns, how pupil(s) might be harmed/at risk and the mitigation measures the School has in place to control the risks

Step 5: Review your risk assessment and update if necessary

- (1) regularly review actions for the pupils identified and across the school and
- (2) regularly monitor the efficacy of the measures in place or as required.

Example template risk assessment

Individual Pupil Risk Assessment

Pupil name		RA undertaken by	
Year		Others involved in risk assessment	

Context: *Who is at risk? Who are they at risk from? What mitigation measures are already in place?*

The below is based on the principles that:

Risk assessment in supervised spaces within school

Risk	L	I	S	Mitigation measures	L	I	S	Action	Person Responsible	Actioned by when?	Done

Risk assessment in unsupervised spaces within school

Risk	L	I	S	Mitigation measures	L	I	S	Action	Person Responsible	Actioned by when?	Done

Risk assessment in journey to and from school

Risk	L	I	S	Mitigation measures	L	I	S	Action	Person Responsible	Actioned by when?	Done

Risk assessment outside of school

Risk	L	I	S	Mitigation measures	L	I	S	Action	Person Responsible	Actioned by when?	Done

Review date:

L – Likelihood; I – Impact; S – Seriousness

		Impact				
		Negligible 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Likelihood	5 Almost certain	Moderate 5	High 10	Extreme 15	Extreme 20	Extreme 25
	4 Likely	Moderate 4	High 8	High 12	Extreme 16	Extreme 20
	3 Possible	Low 3	Moderate 6	High 9	High 12	Extreme 15
	2 Unlikely	Low 2	Moderate 4	Moderate 6	High 8	High 10
	1 Rare	Low 1	Low 2	Low 3	Moderate 4	Moderate 5

Allocation of Tasks

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Estates & Operations Bursar	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	The Senior Deputy Head, working with the Estates & Operations Bursar	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Estates & Operations Bursar	As required, and at least termly
Reviewing input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	The Senior Deputy Head, working with the Estates & Operations Bursar	As required, and at least annually
Formal annual review	Audit & Risk Committee, Governing Body	Annually

Version Control

Date Approved	6 th December 2024 (Governing Body)
Date Reviewed	22 nd November 2024 (Audit & Risk Committee, Governing Body)
Next Review Date	Autumn Term 2025
Policy author (SMT)	Estates & Operations Bursar
Status	Internal Staff
Report	Health and Safety

Ph4050125