

# Risk Assessment Policy for Pupil Welfare

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**Westbury House**

May 2021

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## 1 Aims

- 1.1 This is the risk assessment policy for pupil welfare of Westbury House (**School**).
- 1.2 The aims of this policy are as follows:
  - 1.2.1 to reduce the likelihood that pupils are harmed through negligence, lack of foresight or proper planning by setting out the School's active approach to managing risk
  - 1.2.2 to implement a framework for the identification and assessment of risk(s) to pupil well-being
  - 1.2.3 to promote a culture of safety, equality and protection
  - 1.2.4 in order to actively safeguard and promote the welfare and well-being of pupils of the School.

## 2 Scope and application

- 2.1 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

## 3 Regulatory framework

- 3.1 This policy has been prepared to meet the School's responsibilities under:
  - 3.1.1 Education (Independent School Standards) Regulations 2014
  - 3.1.2 Statutory framework for the Early Years Foundation Stage (DfE, September 2021)
  - 3.1.3 Education and Skills Act 2008
  - 3.1.4 Children Act 1989
  - 3.1.5 Childcare Act 2006
  - 3.1.6 Equality Act 2010
  - 3.1.7 Health and Safety at Work etc. Act 1974
  - 3.1.8 Data Protection Act 2018 and General Data Protection Regulation (GDPR); and
  - 3.1.9 Regulatory Reform (Fire Safety) Order 2005.
- 3.2 This policy has regard to the following guidance and advice:
  - 3.2.1 Keeping children safe in education (DfE, September 2021) (**KCSIE**)
  - 3.2.2 Working together to safeguard children (HM Government, July 2018)
  - 3.2.3 Revised Prevent duty guidance for England and Wales (HM Government, July 2015)
  - 3.2.4 Prevent duty: departmental advice for schools and childcare providers (DfE, June 2015)
  - 3.2.5 Preventing and tackling bullying: advice for headteachers, staff and governing bodies (DfE, July 2017)

- 3.2.6 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, March 2015); and
- 3.2.7 Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018).
- 3.3 The School policies, procedures and resource materials that are relevant to this policy are set out under the heading "School policies".
- 4 Publication and availability**
- 4.1 This policy is available in the Parent Handbook.
- 4.2 This policy is available in hard copy on request.
- 4.3 A copy of the policy is available for inspection from the School Secretary during the School day.
- 4.4 This policy can be made available in large print if required.
- 5 Responsibility statement and allocation of tasks**
- 5.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.
- 5.2 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Keeping the policy up to date and compliant with the law and best practice	Head	As required, at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness.	Deputy Head	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Head	As required
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Data Coordinator	As required, and at least termly

Task	Allocated to	When / frequency of review
Formal review	ILG	As required, and at least every 2 years

## 6 Pupil welfare

6.1 The School recognises its responsibility to safeguard and promote the welfare of pupils in its care. This responsibility encompasses the following principles:

- 6.1.1 to support pupils' physical and mental health and emotional well-being (as well as their social and economic well-being)
- 6.1.2 to identify children who may require early help, in need and / or those suffering, or likely to suffer, significant harm<sup>1</sup>
- 6.1.3 to protect pupils from abuse, violence, sexual violence, harassment and exploitation and neglect
- 6.1.4 to recognise that corporal punishment can never be justified
- 6.1.5 to provide pupils with appropriate education, training and recreation
- 6.1.6 to encourage pupils to contribute to society
- 6.1.7 to protect pupils from the risk of honour based violence, FGM, radicalisation, extremism and being drawn into terrorism, modern slavery, human trafficking by actively promoting fundamental British values and providing appropriate support to those assessed as being vulnerable
- 6.1.8 to ensure that pupils are provided with a safe and healthy environment so far as reasonably practicable
- 6.1.9 to promote a whole school approach to online safety and to protect pupils from the risks arising from the use of technology
- 6.1.10 to listen to pupils' complaints and concerns and to manage welfare concerns effectively

6.2 The School is committed to promoting and safeguarding the welfare of all of its pupils having regard to the special requirements of individual pupils but, where appropriate or necessary, balancing the special requirements of individual pupils against the School's responsibilities to promote and safeguard the welfare of all its pupils.

6.3 In addition, when carrying out its assessments, the School will endeavour to take into account all relevant factors including, where appropriate:

- 6.3.1 a pupil's wishes and feelings, wherever possible
- 6.3.2 their family circumstances
- 6.3.3 the wider community context in which they are living
- 6.3.4 wider environmental and/or other extra-familial threats and/or new and emerging threats e.g. online threats.

<sup>1</sup> As defined by section 17 and / or section 47 of the Children Act 1989

- 6.4 The School addresses its commitment to these principles through prevention and protection measures.
- 6.5 **Prevention:** ensuring that all reasonable measures are taken to minimise the risk of harm<sup>2</sup> to pupils and their welfare by:
- 6.5.1 ensuring through training that all staff are aware of and committed to this policy and the values set out
  - 6.5.2 establishing a positive, supportive and secure environment in which pupils can learn and develop
  - 6.5.3 including in the curriculum, sport and recreation arrangements, activities and opportunities for personal, social, health and economic education (**PSHE**) and Relationship and Health Education (**RHE**) which equip pupils with skills to enable them to protect their own welfare and that of others
  - 6.5.4 providing medical and pastoral support that is accessible and available to all pupils
  - 6.5.5 providing pupils with the confidence and a mechanism, to raise any problems, concerns or complaints they may have
  - 6.5.6 providing support as soon as a problem emerges at any point in a child's life and taking appropriate action in accordance with Kingston and Richmond Safeguarding Children Partnership referral threshold document. In particular, the School will be alert to the potential need for early help for a child who:
    - (a) is disabled and has specific additional needs
    - (b) has special educational needs (whether or not they have a statutory education health and care plan)
    - (c) is a young carer
    - (d) is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
    - (e) is frequently missing /goes missing from care or from home
    - (f) is misusing drugs or alcohol themselves
    - (g) is at risk of modern slavery, trafficking or exploitation
    - (h) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic abuse
    - (i) has returned home to their family from care
    - (j) is showing early signs of abuse and / or neglect; and / or
    - (k) is at risk of being radicalised or exploited; and/or
    - (l) is a privately fostered child.
- 6.6 **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:

<sup>2</sup> The harm test is explained on the Disclosure and Barring service website on GOV.UK

- 6.6.1 Proactively sharing information in order to promote the welfare and protect the safety of pupils with appropriate agencies and involving pupils and their parents appropriately
- 6.6.2 monitoring pupils known or thought to be at risk of harm or requiring additional support and formulating and / or contributing to support packages for those pupils; and
- 6.6.3 maintaining an attitude of "it could happen here"
- 6.7 The School recognises that pupil welfare and well-being can be adversely affected by many matters whether in or away from school, including abuse, bullying, violence and harassment, radicalisation, behavioural and health issues.

## 7 School policies

- 7.1 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.

<b>Policy</b>	<b>Overall responsibility for implementation of policy and authorisation of risk assessments</b>
Safeguarding / child protection	Head
Anti-bullying	Deputy Head
Behaviour Management	Deputy Head
Acceptable use policy for pupils Online safety policy (within Safeguarding)	Head and Head of EYFS
Health and safety policy	Head and School Secretary
First aid policy	Head and School Secretary
Administration of medicines / supporting pupils at school with medical conditions	Head, School Secretary and Lead First Aider
Special educational needs and learning difficulties policy Accessibility plan	SENCo
Educational visits policy	Deputy Head
Supervision	Head
Safety and supervision on school journeys (included in Educational Visits policy)	Deputy

<b>Policy</b>	<b>Overall responsibility for implementation of policy and authorisation of risk assessments</b>
Access to school premises (security policy)	School Secretary
Supervision of ancillary, contract and unchecked staff (included in Safer Recruitment)	Head and School Secretary
Recruitment, selection and policy	Head and School Secretary
Complaints procedures	Head

## 8 Risk assessment

- 8.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified. The assessment and action will be recorded and regularly monitored and reviewed. More guidance on risk assessment can be found in Appendix 1.
- 8.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate or by using the attached risk assessment form at Appendix 2). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.
- 8.3 The information obtained through this process and the action agreed will be shared, as appropriate, with other staff, parents and third parties in order to safeguard and promote the welfare of a particular pupil or of pupils generally.
- 8.4 The school's specific systems include keeping records using SIMS (general information /rewards and sanctions), MyConcern (Safeguarding) and Pupil Notes found on T drive (for general concerns and incidents). Responsibility for record keeping is the remit of the Senior Leadership Team, including the SENCo, and the Form Tutor team. Records are monitored by the SLT.

## 9 Safeguarding / child protection

- 9.1 The School has safeguarding policies and processes in place that reflect national safeguarding requirements and the Kingston and Richmond Safeguarding Children Partnership procedures and practices, including local protocols for assessment and threshold document.
- 9.2 The School's policies and processes ensure that all members of the School community understand that safeguarding is everyone's responsibility. They have been designed to enable staff and others working with children to be confident about identifying , supporting and, where necessary making reports to the appropriate persons including the Designated Safeguarding Lead (**DSL**) and/or external authorities, in respect of any child who may be in need of help or protection including:



- 9.2.1 where a child is in immediate danger or is at risk of harm
  - 9.2.2 where a child is in need (that is, a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled)
  - 9.2.3 any child who may require an early help assessment
  - 9.2.4 any child where there are concerns regarding female genital mutilation (FGM)
  - 9.2.5 any child where there are concerns about sexual violence and/or sexual harassment; and
  - 9.2.6 any concern about another staff member who may pose a risk of harm to children.
- 9.3 The School's policies and processes describe and reinforce how the School works with children's social care, the local authority designated officer, the police, health services and other services to promote the welfare of children and protect them from harm. This includes:
- 9.3.1 providing a co-ordinated offer of early help when additional needs of children are identified
  - 9.3.2 contributing to inter-agency plans to provide additional support to children subject to child protection plans
  - 9.3.3 allowing access for relevant local authority personnel to conduct, or to consider whether to conduct, assessments and child protection investigations under the Children Act 1989
  - 9.3.4 making it clear that safeguarding is everyone's concern and ensuring that staff trained as to when they must make a report themselves to the external services (such as in the case of FGM) and when they should use the School's internal processes and procedures
  - 9.3.5 making it clear that staff must follow up with the DSL and/or relevant external services in the event that they remain concerned about a child or if they are not satisfied with the response and escalate their complaint accordingly
- 9.4 Full details of the School's safeguarding procedures are set out in the safeguarding and child protection policy and procedures. Details of the School's online safety strategy are set out in the Anti-bullying policy.
- 9.5 The School's process for safer recruitment is detailed in the recruitment, selection and disclosure policy and procedure.
- 10 Protection from radicalisation and extremism**
- 10.1 Details of the School's procedures to prevent pupils from becoming radicalised and / or being drawn into extremism and / or terrorism are set out in the safeguarding and child protection policy and procedures.
- 10.2 The School will meet these obligations by assessing the risk of pupils being drawn into radicalisation and / or extremism and / or terrorism and putting in place control measures to support those at risk.

10.3 The School is committed to providing a safe space in which pupils can consider and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

10.4 The School will ensure that the arrangements for visiting speakers, whether invited by staff, pupils or parents, are suitably risk assessed before the visit takes place and that clear protocols are in place to ensure that those visiting speakers are suitable and are appropriately supervised when on School premises.

## 11 **Anti-bullying**

11.1 The School is committed to preventing bullying and has a written anti-bullying policy which covers the School's approach to the management of bullying, cyberbullying and peer on peer abuse.

11.2 Bullying can happen to all pupils and the School is alert to the effect any form of bullying can have. Appropriate support is provided to all those involved in any incident of bullying, taking into account the individual circumstances and level of need.

11.3 The School understands that a range of factors may result in some pupils being more vulnerable to bullying and its impact than others. These factors will be taken into account when assessing the risks to the welfare of such pupils and appropriate support measures put in place.

11.4 Low level disruption and harmful behaviour (including low level sexualised behaviour) is tackled at an early stage to prevent negative behaviours escalating.

## 12 **Behaviour**

12.1 The School has a written behaviour policy which sets out how it promotes good behaviour amongst pupils and the sanctions to be adopted in the event of pupil misbehaviour.

12.2 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 disabilities), support systems for pupils and liaison between parents and other agencies.

## 13 **Health and safety**

13.1 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.

13.2 The School will meet this requirement 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. This will include premises safety and security issues posed by public rights of way and access by visitors and/or third parties, and the safety and safe use of equipment.

## 14 **Special educational needs**

14.1 The School will make appropriate arrangements to identify and support all pupils with special educational needs, whether or not they have the benefit of an education, health and care plan as set out in the special educational needs policy.

## 15 Medical issues

- 15.1 The School has a duty to make appropriate arrangements for:
- 15.1.1 first aid - to ensure that it is administered to anyone who requires it in a timely and competent manner
  - 15.1.2 the administration of medicine to pupils
  - 15.1.3 supporting pupils with medical conditions (including mental health conditions).
- 15.2 Details of the School's arrangements for these are set out in the First Aid and Administration of Medicine policies and risk assessments.

## 16 Recruitment-related issues

- 16.1 Details of the School's procedures on recruitment-related issues such as selection, DBS checks (including late DBS checks) and disclosure are set out in the School's safer recruitment policies and procedures.

## 17 Reporting and information-sharing

- 17.1 When assessing risks to pupil welfare and well-being at the School, all staff should also consider whether the matter should be reported to external agencies and /or regulatory bodies, including but not restricted to, children's social care, the police the Channel Police Practitioner, to the Modern Slavery Trafficking Unit of the National Crime Agency and/or child and adolescent mental health services (**CAMHS**).
- 17.2 The procedures for reporting safeguarding concerns are set out in the School's safeguarding and child protection policy and procedures.
- 17.3 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern.
- 17.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.
- 17.5 The School shall inform the applicable local authority in the appropriate circumstances of any pupil who is going to be added to or deleted from the School's admission register.

## 18 Training

- 18.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 18.2 The level and frequency of training depends on role of the individual member of staff and the need for them to complete risk assessments as part of their role.
- 18.3 The School maintains written records of all staff training.

## 19 Record keeping

- 19.1 The School will retain records of the significant findings of the relevant risk assessments , together with, where necessary, evidence of the action taken to implement the findings of the risk assessments and to reduce the risks identified.
- 19.2 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 19.3 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data about pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's [• data protection policy and information security policy].

## 20 Version control

Date of adoption of this policy	March 2021
Date of last review of this policy	May 2021
Date for next review of this policy	Spring 2023
Policy owner (SMT)	Head
Policy owner (Proprietor)	ILG

## **Appendix 1 Guidance on risk assessment**

A pupil welfare risk assessment is a careful examination of what could cause harm to pupil welfare and a consideration of appropriate control measures, so that you can weigh up whether the School has taken adequate precautions or should take additional steps to prevent the risk of harm.

The risk assessment process is not intended to create huge amounts of paperwork and neither should it be viewed as purely a tick box or paper exercise. Its purpose is to identify sensible measures to control real risks - those that are most likely to occur and / or will cause the most harm if they do.

When thinking about your risk assessment in this context, remember:

- a welfare issue is anything that may harm a pupil; to include cyber-bullying, abuse and the risk of radicalisation and extremism
- the risk is the chance that a pupil could be harmed, together with an indication of how serious the harm could be if it occurs.

### **Step 1: Identify the issue**

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.

### **Step 2: Decide who might be harmed and how**

Identify individual pupils or groups of pupils who might be harmed and how they might be harmed by the concern raised.

### **Step 3: Evaluate the risks and decide on precautions**

Decide what to do about the risks, how information should be shared and follow any procedures regarding the internal authorisation of suggested precautions.

Compare what you currently do with what is required by law, DfE guidance or is accepted good practice. If there is a difference, list what needs to be done to protect the pupil's welfare. Where appropriate take into account any special requirements or protected characteristics.

### **Step 4: Record your findings and implement them**

Make a written record of your significant findings - the concern, the issues, how pupil(s) might be harmed and what arrangements the School has in place to control those risks.

There is no prescribed format for this record but any record produced should be simple and focussed on control measures and the steps the School proposes to take to manage the risk.

### **Step 5: Review your risk assessment and update, if necessary**

Assessment should be a dynamic process which analyses and responds to the changing nature and level of need and/or risk. You should review what you are doing for the pupils identified and across the School generally and monitor and review the efficacy and / or the outcome of the measures you have put in place on a regular basis, or as required.

## Appendix 2 Example template risk assessment

What is the welfare issue?	Who might be harmed and how?	What measures are already in place?	What further action is necessary?	Action by whom?	Action by when?	Action completed?	Review date
Alleged bullying of Pupil A by Pupil B	Pupil A	Both pupils have been interviewed and investigation is ongoing.	Pupil A should not sit next to Pupil B in class.  Lunchtime staff and playground supervisors to keep an eye on Pupils A and B at break times and report any incidents to [• name].	Class teacher  Lunchtime and playground Supervisors	Immediately  Immediately	Yes - communicated to staff on [• 00 month year]	
Pupil A has been overheard telling Pupil B that [• he / she] intends to travel to Syria to live a better life.	Pupil A, Pupil B and other pupils.	Both Pupil A and B have been spoken to and interviewed by the DSL and the parents, the police and children's social services have been informed.	Pupil A should be referred to the Channel Programme.  Obtain pupil and parent consent to engage in the Channel programme.	DSL  DSL	Immediately		
Pupil A has alleged that she was sexually	Pupil A, Pupil B and other pupils.	Referral has been made to children's social care on the	Pupil B to have an amended timetable so that he is not in	DSL	Immediately		

<p>touched by Pupil B on the bus on the way to school.</p>		<p>same day, submitting a MARF (Multi Agency Referral Form) for both children. The MARF led to immediate police involvement.</p> <p>There are presently no bail conditions or recommendations that Pupil B is suspended.</p>	<p>any class with Pupil A (to be kept under review pending further advice from authorities)</p> <p>Specific teaching staff to be briefed on the need to ensure the children are not together.</p> <p>Pupil A given a trusted adult she could go to at any time: staff member will meet with her regularly and support her with break and lunchtime arrangements</p>	<p>Teaching staff</p> <p>Trusted adult</p>			
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