



## Introduction

This policy has been developed to ensure that suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk, including school trips. It requires that major risks are identified and managed as part of an overarching policy with a view to safeguarding students, staff and other persons so far as is reasonably practicable.

This policy meets The Education (Independent School Standards) Regulations 2014

(ISSR) requirement for a written risk assessment policy to be in place and to meet the requirement for leadership in and management of schools.

Employers furthermore, have a duty to safeguard the health and safety of their employees under Section 2 of the Health and Safety at Work etc. Act 1974 (HASWA).

## Scope

### Applicability

This policy applies to all members of ICS staff with responsibility for developing/implementing risk management strategy and undertaking risk assessments for activities which are under their control.

### Statutory guidance

[The Education \(Independent Schools Standards\) Regulations \(ISSR\) 2014](#)

This policy is available on request from the school offices. We also inform parents and guardians about this policy when their children join ICS, through our website. The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our ICS Professional Code of Conduct.

### Failure to comply

As part of ICS's commitment to Safeguarding and Child Protection, all members of staff who are responsible for creating risk assessments must follow the contents of this policy. Failure to do so will result in intervention/disciplinary action by the Senior Leadership Team.

## Risk management and assessment policy

### 1 Guidance

The Advisory Board and the Head of School will be responsible for ICS's overarching risk management and assessment policy. The overall strategy will be reviewed formally on an annual basis.

Risk management strategy and risk assessments are recorded and reviewed when appropriate.

Senior managers will identify those in ICS who are responsible for conducting risk assessment and monitoring its implementation. However, anyone that organises any form of activity within the school or outside is required to assess the risks in relation to their activity prior to the start of the activity and have documentation approved by the Principal or a delegated member of staff or Head of School.

Those affected by school activities will receive suitable information on what to do through the risk management strategy and individual risk assessments.

Identified control measures are implemented to control risks as far as reasonably practicable.

## **2 Key risk areas**

Risk assessments must be written for the following activities (See Appendix 2 in addition) and be approved by the School Principal or delegated member of staff or Head of School as appropriate

- (a) Student supervision (including safeguarding and welfare requirements). This will include implementation of the School Designated Safeguarding Lead (DSL) role and also covers a range of responsibilities outside safeguarding e.g. break and lunchtime play
- (b) School trips day or overnight (please refer to Trips and Visit policy and Global Classroom policy for guidance and relevant timelines for completion and approval)
- (c) Management of visitors on school premises
- (d) Fire and emergencies
- (e) Traffic and pedestrian interaction
- (f) Management of hazardous substances
- (g) Use of hazardous equipment e.g. in Technology, Art, Science etc
- (h) The suitability of staff to undertake designated roles and checks to ensure that they are suitable including staff not employed by the School who work with students off-site

(i) Risk areas which are not directly related to health and safety, including but not limited to:

- (i) Recruitment procedures
- (ii) Terrorism, including the prevention of fundamentalism and extremism
- (v) Student self-harming
- (vi) Security, in the EYFS areas

### **3 Requirements of the ISSR**

3.1 Part 3, para 16 of the ISSRs identifies that a dedicated risk assessment policy is required of schools. The policy must be in place to control major risks and identify sufficiently detailed procedures for risk assessment. It is not suitable for the information to be woven amongst several documents. The detail required (non-exhaustive) should include:

- (a) When to complete risk assessments
- (b) Who is responsible for drafting and checking?
- (c) Records to be kept
- (d) Training requirements for staff

3.2 The risk management strategy includes the assignment of roles to competent persons (either internal or external) and associated training will be provided.

3.3 The Head of School, Principals, the CFO/Bursar and the HR Senior Manager are responsible for the implementation of the risk assessment policy.

3.4 This guidance is applicable to general risk assessment. Where specialist skills are required, e.g. asbestos, legionella, fire, and hazardous substances, there are separate policy arrangements in place. Teaching area risk assessment checklists are also in place for guidance.

3.5 All staff receive guidance on risk assessment as part of their induction. This will be refreshed on an annual basis.

Risk assessment training will be provided on specific areas where identified by the Principals, the CFO/Bursar and the HR Senior Manager.

3.6 A template risk assessment form is included at Appendix 1 to this guidance. The school adopts the Consortium of Local Education Authorities for the Provision of Science Services CLEAPSS Advisory Service model risk assessments for lessons in Science and Technology.

3.7 Risk assessments will take into account:

- (a) Hazard - something with the potential to cause harm

- (b) Risk - an evaluation of the likelihood of the hazard causing harm
- (c) Risk rating - assessment of the severity of the outcome of an event
- (d) Control measures - physical measures and procedures put in place to mitigate the risk

3.8 The risk assessment process will consist of the following 6 steps:

- (a) What could go wrong?
- (b) Who might be harmed?
- (c) How likely is it to go wrong?
- (d) How serious would it be if it did happen
- (e) What will be done to stop/minimise the risk
- (f) How you are going to check that your plans are working

## **4 Monitoring**

4.1 The Head of School, Principals, CFO/Bursar and the HR Senior Manager will be responsible for the maintenance of risk assessment records. The policy is reviewed and considered annually by the Senior Leadership Team (SLT) and by the Advisory Board.

4.2 Risk assessments will be reviewed:

- (a) When there are changes to the activity
- (b) After a near miss or accident
- (c) When there are changes to the type of people involved in the activity
- (d) When there are changes in good practice
- (e) When there are legislative changes
- (f) Annually if for no other reason

4.3 A list of areas (non-exhaustive) that require risk assessment is included in Appendix 2.

## **5. Sensible Risk Management**

5.1 Sensible Risk Management

In 2007 the Health and Safety Executive launched a 'sensible risk management' strategy and ICS echoes these principles.

5.2 Sensible risk management is about:

- Ensuring that workers and the public are properly protected

- Providing overall benefit to society by balancing benefits and risks, with a focus on reducing real risks – both those which arise more often and those with serious consequences
- Enabling innovation and learning not stifling them
- Ensuring that those who create risks manage them responsibly and understand that failure to manage real risks responsibly is likely to lead to robust action
- Enabling individuals to understand that as well as the right to protection, they also have to exercise responsibility.

5.3 Sensible risk management is not about:

- Creating a totally risk free society
- Generating useless paperwork mountains
- Scaring people by exaggerating or publicising trivial risks
- Stopping important recreational and learning activities for individuals where the risks are managed
- Reducing protection of people from risks that cause real harm and suffering.

5.4 Appendix 3 provides further insight into risk assessment development.

## References

### 6. Links to other Health and Safety documents:

6.1 ICS Health and Safety Policy Statement, Organisation and Arrangements

A: [2014 No. 3283: The Education \(Independent School Standards\) Regulations; point \(16\).](#)

B: [Health & Safety Executive, Five steps to risk assessment](#)

C: [Health and Safety: Advice for Schools, April 2022](#)

D: [Early Years Foundation Stage \(EYFS\) Statutory Framework](#)

E: [Charities and Risk Management, The Charities Commission](#)

F: [Risk Management framework: A Ten Point plan and What is Risk Management by the NCVO](#)

G: [Home Office guidance on duties under the Counter Terrorism Act 2015](#)

H: [Health and Safety at Work etc. Act 1974](#)



## Appendix 1 What is risk assessment?

A risk assessment is an important step in protecting students and colleagues, and a service staff provide on behalf of ICS, as well as complying with the law. It helps focus on the risks that really matter in an area – the ones with the potential to cause harm.

In many instances, straightforward measures can readily control risks, for example, ensuring spillages are cleaned up promptly so people do not slip or cupboard drawers are kept closed to ensure people do not trip. For most, that means simple, cheap and effective measures to ensure all are protected.

The law does not expect you to eliminate all risk, but you are required to protect people as far as is 'reasonably practicable'.

Don't overcomplicate the process. In many areas of the school, the risks are well known and the necessary control measures are easy to apply. You probably already know whether, for example, you have employees who move heavy loads and so could harm their backs, or where people are most likely to slip or trip. If so, check that you have taken reasonable precautions to avoid injury.

### The Risk Assessment Process

#### A Identify the hazards

First you need to work out how people could be harmed. When you work in a place every day it is easy to overlook some hazards, so here are some tips to help you identify the ones that matter:

- Walk around your workplace and look at what could reasonably be expected to cause harm.
- Ask your colleagues, students and Health and Safety Manager what they think. They may have noticed things that are not immediately obvious to you.
- Check manufacturers' instructions or data sheets for chemicals and equipment as they can be very helpful in spelling out the hazards and putting them in their true perspective.
- Have a look back at your accident and ill-health records – these often help to identify the less obvious hazards.
- Remember to think about long-term hazards to health (e.g. high levels of noise or exposure to harmful substances) as well as safety hazards.

NOTE: It is general ICS Policy that each risk assessment includes an assessment of the activity, event or visit with regard to safeguarding and personal security and suitable control measures are put in place for the risks.

#### B Decide who might be harmed and how

For each hazard you need to be clear about who might be harmed; it will help you identify the best way of managing the risk. That doesn't mean listing everyone by name, but rather identifying groups of people (e.g. 'people working in the storeroom' or 'passers-by').



Remember:

- Some workers have particular requirements, e.g. new and young workers, migrant workers, new or expectant mothers and people with disabilities may be at particular risk. Extra thought will be needed for some hazards;
- Cleaners, visitors, contractors, maintenance workers etc, who may not be in the workplace all the time
- Members of the public, if they could be hurt by your activities
- Students

If you share your workplace, you will need to think about how your work affects others present, as well as how their work affects your staff – talk to them

Ask your staff if they can think of anyone you may have missed.

In each case, identify how they might be harmed, i.e. what type of injury or ill health might occur.

C Evaluate the risk and decide on control measures

Having spotted the hazards, you then have to decide what to do about them. The law requires you to do everything ‘reasonably practicable’ to protect people from harm but your risk assessment should only include what you could reasonably be expected to know – you are not expected to anticipate unforeseeable risks.

So first, look at what you’re already doing; think about what controls you have in place and how the work is organised. Then see if there’s more you should be doing.

When controlling risks, apply the principles below, if possible in the following order known as the hierarchy of control (ERICPD):

- E Eliminate the hazard – e.g. - get rid of the hazard completely if possible
- R Reduce or substitute the hazard – e.g. use less volume of a hazardous chemical or substitute the chemical for a less hazardous substance
- I Isolate the hazard – e.g. put barriers between pedestrians and traffic
- C Control the hazard – e.g. educate staff on how best to perform significant hazardous activities through manual handling training
- P Personal Protective Equipment (PPE) – as a last resort, issue all employees performing the activity with PPE e.g. clothing, safety shoes, goggles, gloves etc.
- D Discipline – if controls are not being used or guidance not being followed by staff, remember that breaching health and safety can be classed as gross misconduct which could result in disciplinary action. Don’t ignore breaches or non-compliance make sure that you speak to staff and record that you have done so in 1:1’s and supervisions.

Improving health and safety need not cost a lot. For instance, placing a mirror on a dangerous blind corner to help prevent vehicle accidents is a low-cost

precaution considering the risks. Failure to take simple precautions can cost you a lot more if an accident does happen.

Importantly involve staff, so that you can be sure that what you propose to do will work in practice and won't introduce any new hazards.

#### D Record your findings and implement them

Putting the results of your risk assessment into practice will make a difference when looking after your students, colleagues and others. Writing down the results of your risk assessment, and sharing them with your colleagues, encourages you to do this. It is a legal requirement for ICS to record its risk assessments. The ICS Risk Assessment pro forma is available as Appendix A.

We do not expect a risk assessment to be perfect, but it must be suitable and sufficient. You need to be able to show that:

- a proper check was made
- you asked who might be affected
- you dealt with all the obvious significant hazards, taking into account the number of people who could be involved
- the precautions are reasonable, and the remaining risk is low
- you involved your colleagues in the process.

#### E Review your risk assessment and update if necessary

Few workplaces stay the same. Sooner or later, you will bring in new equipment, substances and procedures that could lead to new hazards. It makes sense therefore; to review what you are doing on an ongoing basis. ICS recommends that you formally review your risk assessments at least every year.

It is recommended that you review your risk assessments sooner if:

- there is an accident or near miss
- you have new equipment
- you change premises
- you have new staff
- or anything else significant changes.

**Appendix 2: Risk Assessment template**

**RISK ASSESSMENT**

Risk assessment name		Site/Department	
Assessment date		Review period	
Approved by		Review date	
Approved by		Reference	

Description

Overall risk Rating

Hazard	Harm	Who /How could be harmed	Existing Controls	Risk Rating (LxS)

Further control Measures

**Risk Rating Explanation**

Risk ratings are calculated by considering the likelihood of an event occurring along with the severity of the potential consequence should an accident occur. After considering existing control measures, values are assigned to the likelihood and severity from the scales below and these figures multiplied to establish the risk rating.

**Probability of occurrence**

Highly unlikely		Likely
Highly likely		
1	3	5

**Severity of the consequence**

1	3	5
Minor injury / harm	Major injury/Harm	Fatality

Probability	5	10	15	20	25
	4	8	12	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
	Severity				

What do your risk ratings mean?

Risk is categorised as LOW: Look to reduce risk if practicable

Risk has been categorised as MEDIUM: Begin to plan your action to reduce the risk immediately

Risk has been categorised as HIGH: Immediate action required to reduce the risk

**Guidance**

## Hazard

Something that has the POTENTIAL to cause harm

When undertaking a risk assessment, the specific activity must, wherever possible, be conducted within recognised guidelines, rules, laws and standards e.g. sports – in accordance with the national body for that sport

- Football – the Football Association
- Rugby Union – Rugby Football Union
- Netball – International Netball Federation
- Rock climbing - Mountain Instructor Award (MLTUK)

The websites of these bodies usually have these rules, standards, laws etc. freely available and some very good examples of best practice. In many cases, they will have plans and processes that might save you a tremendous amount of work or at least give you a starting point to planning your activity.

Typical examples:

When crossing a road – the hazards are cars, buses, taxis, motorbikes, bicycles etc ... road vehicles

When playing in the park or undertaking sports in the park, the hazards may be –

- ruts, potholes, 'lumps and bumps' .... surface condition
- rocks, fallen branches, litter, human and animal detritus ..... debris or cleanliness
- changes in level (steps and ramps), wet grass, long grass, no grass (patchy), snow/ice .... slips, trips and falls
- strong winds, rain, snow, fog, flooding, waterlogged play areas etc ..... adverse weather

'People' type hazards may be:

- student or staff becoming ill, hyperthermia, hypothermia (heat and cold extremes) .... Illness
- worsening of existing medical condition/s, adverse reaction to an allergy etc .... existing medical episode
- student/staff behaviour .... behaviour
- 'stranger danger', safeguarding, public disorder, acts of violence and aggression from public (others), students wandering off .... personal safety and/or security\*

\*When dealing with children and young persons, Personal Safety and Security must be included in each risk assessment as a hazard on its own. The risk assessor must consider the risks associated with this heading.

Students that require specific individual support must be covered by a separate assessment to ensure their needs are being met and then reviewed against the activity risk assessment to ensure overall risk levels are maintained as low as is reasonably practicable (ALARP).

## Harm

What sort of harm could you reasonably expect when the groups of people identified in the 'Persons at Risk' column come into contact the hazard?

Typical harms could be:

- Grazing
- Bruising
- Cuts
- Amputation
- Sprains and strains
- Fractures (broken bones)
- Unconsciousness
- Paralysis
- Death

Or

- Worsening of existing medical condition
- Worsening of existing injuries
- Allergic reaction
- Anaphylactic shock

### **Control Measures**

What are you doing or putting in place to prevent harm from the hazard?

ALWAYS use the hierarchy of control – ERIC PD:

E – eliminate – get rid of the hazard completely

R – reduce – OK so we cannot eliminate but can we improve it by putting in place some additional controls so that we need to do it less often, can we reduce the number of people who are allowed to come in contact or be exposed to the hazard.

I – isolate – completely separate the hazard from people or people from the hazard

C – control - this is where we consider organizational and technical controls such as safe systems of work, procedures, training, supervision, local exhaust ventilation, machine guards, safety devices and tools to carry out the task

P- PPE (personal protective equipment) – where you can't make everybody safe, then, having applied the above principles, you safeguard the individual by providing PPE, training them in its safe use and make sure they use correctly and at all times when exposed to the hazard

D – discipline – enforce the safety process through disciplinary processes and be prepared to give sanctions against offenders, but mostly to instil personal discipline on those that may be exposed to the hazard

### **Risk Rating**

This is where you make a judgement call ... taking your experience, knowledge and training into consideration and all the control measures listed, what could you reasonably expect the chances of harm being realised?

Using the keys provided, multiply the figures provided for the likelihood and severity. Be realistic ... if in doubt, always err on the side of caution – it's better to be over cautious than not cautious enough.

You need to be REALISTIC – it's no good saying that falling off a kerb could cause death = 5 and saying the likelihood is remote – 1, making a risk rating of 5, when the realistic assessment would be minor injury = 3 and this being possible = 2 and a risk rating of 6.

Once complete, attach it to your activity plan, process or procedure, share the information with those involved in your activity, monitor the risk during the activity and revise:

- if you think it can be improved
- if there are significant changes
- prior to carrying out that activity again
- if the law changes
- if you feel it's no longer accurate or applicable

### **Appendix 3: Risk Assessment areas ( non Exhaustive)**

#### **Educational**

- science experiments
- design & technology
- food technology
- sport and PE activity including swimming
- Primary out-door play (on site and in Regent's Park/Paddington Gardens)
- Secondary patio use and off site lunchtime permission
- art
- music
- drama & dance
- general classroom
- school trips
- ICT

#### **Support**

- catering and cleaning
- caretaking and security
- maintenance
- traffic management
- office
- site visitors
- fire & emergencies

Student Safeguarding and Welfare

Legal Requirements & Education Standards

Any other activity or environment not yet experienced by employees.