

Risk Policy

for whole School: Junior and Senior sections

Issue number	2.0
Name and appointment of owner / author	Stuart Bachelor, Deputy Head
Review Body	SLT, Health & Safety Committee and Full Board of Governors
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Last reviewed by Governors	
Next SLT review due	October 2022
Next Governor review due	February 2020 (Full Board)
Where available	Staff Handbook

Risk Policy

Policy Statement

Under Paragraph 16 of the Independent Schools Standards Regulations, the School is required to ensure that:

- a) the welfare of pupils at the school is safeguarded and promoted by the drawing up and effective implementation of a written risk policy;
- b) appropriate action is taken to reduce risks that are identified.

This policy should be read in conjunction with the following documents:

Attendance Policy
Behaviour Policy
Bereavement Policy
Boarding Policy
Boarding A-Z
City of London Risk Policy
Code of Conduct and School Rules
Consumption of Alcohol by Pupils Policy
Consumption of Alcohol by Staff Policy
Delegation of Health and Safety Responsibilities
Drugs Policy
Fire Prevention Policy
Fire Evacuation Procedures
First Aid Policy
Health and Safety Policy
Initial Risk Assessment Form
Marauding Terrorist Attack and Lockdown Policy
Missing Pupil Procedures
PSHE Schemes of Work
Risk Assessment Guide
Safeguarding Policy
Searches and Confiscation Policy
Security, Access Control, Workplace Safety and Lone Working Policy
Snow Procedures
Staff Code of Conduct
Supervision Policy
Transport Policy
Trips and Visits Policy
Trips Risk Assessment template
the School's risk assessments
the School's Risk Register

Key personnel

Mrs Jo Moore (Bursar)- strategic lead for risk

Mr Stuart Bachelor (Deputy Head) – lead responsibility for safeguarding; Educational Visits Co-ordinator (EVC)

Mrs Anna Atkins (HR Manager)- oversight of on-site risk assessments

Mr Ed Kennedy (Head of Operations)- co-ordinates response to fast-emerging risks

Managing risk at Freeman's

The School assesses risk in relation to all activities and events that could place pupils in serious jeopardy. Where these are identified, the School takes measures to a) reduce the likelihood of the undesirable event happening b) reducing its impact were it to happen. When judging whether or not a level of risk is acceptable, the 'opportunity cost' to pupils' education of stopping the activity is considered. As such, Freeman's staff adopt the approach of a 'prudent parent' in determining if allowing pupils to be exposed to a certain risk is or is not, on balance, in their best interests. However, steps are always taken to ensure that any such judgement is informed by the advice of relevant professional bodies and government agencies.

Below are the main areas of risk to pupils, together with an outline of how the principal risks in that area are reduced to an acceptable level and/or a reference to a separate policy in which further information can be found. Yet further detail can be found in the respective risk assessments.

1. Key safeguarding, child protection and pupil welfare risks

Risk	Action taken to reduce risks	Cross-reference to Policy
Signs of abuse going unnoticed / not followed up	<ul style="list-style-type: none"> comprehensive staff training programme informed by Surrey Safeguarding Children Partnership (SSCP) guidance, including for non-teaching staff; good record-keeping of training undertaken "It could happen here" approach promoted to all staff 9 DSL-level trained staff dispersed around school site, including in Medical Centre; posters with their photographs on them fortnightly information-sharing at Tutor Team meetings 	<i>Safeguarding Policy</i>
Victim / friend of victim not willing to disclose	<ul style="list-style-type: none"> pupil safeguarding training incorporated into PSHE programme every September, pupils encouraged by Designated Safeguarding Lead to share concerns staff proactive in modelling behaviour designed to foster pupil confidence and trust in the School Upper School peer mentoring scheme; U5 Wellbeing Prefects; Sixth Form Junior School 	<i>Safeguarding Policy</i>

	<p>Prefects</p> <ul style="list-style-type: none"> • Every Junior School room has a 'worrybox' 	
Member of staff with intent to harm children	<ul style="list-style-type: none"> • all SLT received NSPCC Safer Recruitment January 2020 • robust Staff Code of Conduct • new staff with late DBS checks risk-assessed, with no unsupervised access to children • Whistleblowing Policy (covered in staff induction) 	<i>Safeguarding Policy Staff Code of Conduct</i>
Poor management of safeguarding	<ul style="list-style-type: none"> • termly DSL training attended and cascaded • no safeguarding decision taken in isolation; Headmaster informed of all safeguarding matters • large and diverse Safeguarding Team meeting half-termly • DSL line-managed by Headmaster • Safeguarding Governor and Deputy Governor encouraged to engage with safeguarding regularly • Annual audit and termly data drop co-ordinated by Surrey • Whistleblowing Policy (covered in staff induction) 	<i>Safeguarding Policy</i>
Inappropriate relationship between pupil and staff member	<ul style="list-style-type: none"> • Staff Code of Conduct stipulates clear professional boundaries, iterated at staff induction • additional training on professional boundaries for boarding staff and graduate assistants • thorough system for granting permission to tutor privately 	<i>Staff Code of Conduct</i>
Online grooming / youth-produced sexual imagery	<ul style="list-style-type: none"> • E-safety and healthy relationships a key and iterated part of the PSHE programme • internet filtering, monitoring and follow-up • unfiltered internet access limited by mobile 'phone ban during the school day • whole-staff INSET by Marilyn Hawes August 2018 focusing on grooming • wide pupil participation in the Breck Bednar project 2018-19 • YPSI covered clearly in Behaviour Policy • Parent seminar programme 	<i>Behaviour Policy Safeguarding Policy PSHE Schemes of Work</i>
Radicalisation	<ul style="list-style-type: none"> • all staff completed Home Office on-line Prevent training in Autumn 2019 • Fundamental British Values explicitly promoted and implicit in most of what we do • pupils with unusual and non-mainstream views are engaged with, not marginalised or condemned • visiting speakers vetted 	<i>Safeguarding Policy</i>
Peer-on-peer abuse / bullying	<ul style="list-style-type: none"> • <i>Anti-bullying Policy</i> and Bullying Log • expectation on staff to challenge low-level poor 	<i>Anti-bullying Policy Behaviour Policy</i>

	<p>behaviour, especially inappropriate 'banter', misogyny, homophobia etc.</p> <ul style="list-style-type: none"> • Robust Behaviour Policy properly enforced • Good Lad Initiative- workshops by external providers promoting positive masculinity • Licence purchased for 'Girls on Board' staff anti-bullying training 	<i>Safeguarding Policy</i>
Missing Pupil	<ul style="list-style-type: none"> • clear <i>Missing Child Procedures</i> • Senior School Receptionist and relevant teachers briefed re. flight risks • staff training and reminders re. taking registers promptly and accurately • <i>Attendance Policy</i> updated and promulgated • minimum of 2 emergency contact names and numbers per pupil 	<i>Missing Child Procedures</i> <i>Attendance Policy</i>
Pupil missing education and at risk as a result	<ul style="list-style-type: none"> • Clerical sift half-termly for <90% attendance- follow-up with Surrey if concerns remain 	<i>Safeguarding Policy</i>
Inadequate safeguarding procedures in permanent contractors	<ul style="list-style-type: none"> • DSL engages with Sodexo in order to scrutinise their procedures • Sodexo management invited to attend annual safeguarding INSET 	<i>Safeguarding Policy</i>
contractors with unsupervised access to children	<ul style="list-style-type: none"> • contractor ID checked • contractors sign Code of Conduct • all contractors have sponsoring member of staff • assurances received re. DBS clearance • contractors without DBS clearance accompanied by member of staff at all times unless fully segregated • all contractors working in boarding house always accompanied by member of staff 	<i>Safeguarding Policy</i> <i>Security, Access Control,</i> <i>Workplace Safety and</i> <i>Lone Working Policy</i>
visitors with unsupervised access to children	<ul style="list-style-type: none"> • visitors wear yellow lanyards and badges; accompanied at all times; unaccompanied visitors are challenged 	<i>Safeguarding Policy</i> <i>Security, Access Control,</i> <i>Workplace Safety and</i> <i>Lone Working Policy</i>
suicide / low mood / depression / anxiety / self-harm / eating disorders	<ul style="list-style-type: none"> • compulsory Wellbeing Module in KS4 Enrichment • School Counsellor available three days a week • nurse-led Medical Centre with mental ill health suite • ~12 staff and ~20 pupils every year trained in Mental Health First Aid by certified provider • 6 CPL seminars on pastoral themes per year • Advertisement of online counselling services (e.g. Kooth) 	

	<ul style="list-style-type: none"> • developing an 'Assessment for Wellbeing' approach for academic assessment to reduce counter-productive pressure and anxiety • use of Suicidal Thoughts Disclosure risk assessments as standard procedure • 'Time to Talk' Day marked each February with stands in JS and SS promoting positive mental health • High-performance stress management workshops for KS4 pupils and parents by outside speaker • eating disorders covered in U4 PSHE; healthy eating and positive body image also promoted in PSHE • eating disorders covered in safeguarding slot in January 2018 • self-harm covered in safeguarding slot in Staff Briefing January 2019 • non-judgemental approach by staff towards self-harm and eating disorders 	
malicious / false allegations against staff	<ul style="list-style-type: none"> • procedures informed by <i>Keeping Children Safe in Education</i> • staff trained in how to avoid misunderstandings and prevent professional boundaries becoming blurred (also covered in <i>Staff Code of Conduct</i>). 	<i>Staff Code of Conduct</i> <i>Safeguarding Policy</i>
bereavement	<ul style="list-style-type: none"> • <i>Bereavement Policy</i> in staff handbook • School Counsellor working 3 days per week 	<i>Bereavement Policy</i>

2. Risks arising from public access and lettings

Risk	Action taken to reduce risks	Cross-reference to Policy
member of public coming onto site uninvited with malicious intent / having unsupervised contact with children	<ul style="list-style-type: none"> • barrier to control vehicular access • staff, contractors, visitors and volunteers have coloured lanyards and badges; outside of pick-up / drop-off times, unbadged persons on site are challenged • pupils adequately supervised, including at breaks and before and after school; member of staff on duty after school at pick-up area • uncollected KS2 pupils taken to Homework Club rather than left waiting • Marauding Terrorist Attack policy, training and rehearsal • CCTV on site • 'Private Property- No Entry' signs 	<i>Safeguarding Policy</i> <i>Security, Access Control, Workplace Safety and Lone Working Policy</i> <i>Supervision Policy</i> <i>Marauding Terrorist Attack and Lockdown Policy</i>

	<ul style="list-style-type: none"> fostering good relations with our neighbours movement-sensitive alarms in boarding house night patrols by security staff 	
a lessee having malicious intent / having unsupervised contact with children	<ul style="list-style-type: none"> very few term-time lets lessees agree in writing to comply with the School's health and safety, safeguarding and emergency procedures for term-time lets, written assurance that all adults supervising children are DBS-checked lessees must declare visiting speakers in advance 	<i>Safeguarding Policy</i>
drone on site	<ul style="list-style-type: none"> staff told January 2020 to contact Operations Manager if they see an unannounced drone on site 	

3. Risks during educational visits, sports fixtures etc.

Risk	Action taken to reduce risks	Cross-reference to Policy
safeguarding risk from members of the public	<ul style="list-style-type: none"> every trip has a tailored risk assessment signed off by the EVC that includes 'unaccompanied time' staff:pupil ratios mindful of government guidance regular headcounts 	<i>Trips and Visits Policy</i>
road traffic accident	<ul style="list-style-type: none"> driver and all passengers wear seatbelts seatbelts checked by staff driver, co-driver and passenger assistant protocols MIDAS training and checks on driver 	<i>Safeguarding Policy</i> <i>Transport Policy</i>
pupil illness / injury / allergic reaction	<ul style="list-style-type: none"> care plans, emergency medicine, epipens and first aid kits always taken off site qualified first aider on trip as standard 	<i>First Aid Policy</i>
terrorist attack	<ul style="list-style-type: none"> pupils and staff have had RUN-HIDE-TELL training 	<i>Marauding Terrorist Attack and Lockdown Policy</i>
uncollected pupil	<ul style="list-style-type: none"> except for the oldest pupils, staff wait until last pupil is collected 	

4. Risks associated with boarding

Please see *Boarding Policy*, *Boarding A-Z* and *Safeguarding Policy* for details.

5. Risks associated with premises, grounds, equipment and weather

Risk	Action taken to reduce risks	Cross-reference to Policy
fire	see relevant policies	<i>Fire Prevention Policy</i> <i>Fire Evacuation</i>

		<i>Procedures</i>
access to roofs	<ul style="list-style-type: none"> No easy access to roofs. Door access to roofs in buildings /rooms etc. is controlled by Facilities Team (doors locked with GM or 65-1 key). No ladders or scaffolding left unsecured adequate supervision of pupils 	<i>Health & Safety Policy Supervision Policy</i>
falling / jumping from windows	<ul style="list-style-type: none"> windows locked or fitted with restrictors 	<i>Health & Safety Policy</i>
dangerous chemicals and machinery	see departmental risk assessments	
swimming pool- drowning, high / low chlorine levels	see <i>Swimming Pool Policy</i>	<i>Swimming Pool Policy</i>
falling trees	<ul style="list-style-type: none"> annual tree risk assessment and subsequent works by external contractor tree management database in high winds, staff and pupils e-mailed to keep away from trees 	<i>Health & Safety Policy</i>
ticks- risk of Lyme Disease	see <i>Health & Safety Policy</i>	
wild deer on site- risk of attack	see <i>Health & Safety Policy</i>	
slips, trips and falls	see <i>Health & Safety Policy</i>	
snow	see <i>Snow Procedures</i>	<i>Snow Procedures</i>
dangerous dog / chemical plume over school / lightning storm	<ul style="list-style-type: none"> procedures are in place for suspending movement between buildings 	
major incident causing disruption to education	<ul style="list-style-type: none"> <i>Business Continuity Plan</i> in place and updated periodically 3-hour SLT training in major incident management by Counter Terrorism Policing South East planned for spring 2020 	

6. Risk to pedestrians from vehicles and transport home

Risk	Action taken to reduce risks	Cross-reference to Policy
accident on site	<ul style="list-style-type: none"> vehicle barriers, speed bumps and signage to reduce speed marshals on duty at drop-off / pick-up designated pedestrian crossing points one-way system 	<i>Code of Conduct and School Rules Safeguarding Policy Security, Access Control, Workplace Safety and</i>

	<ul style="list-style-type: none"> • learner drivers not allowed on site • delivery lorries escorted by banksman • <i>Safe Transport at Freemen's</i> booklet launched to parents February 2020 	<i>Lone Working Policy</i>
accident in vicinity	<ul style="list-style-type: none"> • pupils forbidden from using main gates for pedestrian access • crossing supervisor in situ at busy times • parent requested to drop-off / pick-up on the school site rather than on public highway 	
pupil getting on wrong school coach and not being able to get home	<ul style="list-style-type: none"> • destination advertised at front of each coach 	

7. Risks from weapons, knives, blades and compasses

Risk	Action taken to reduce risks	Cross-reference to Policy
pupil bringing in knives etc. to school	<ul style="list-style-type: none"> • robust Searches Policy 	<i>Searches and Confiscation Policy</i> <i>Code of Conduct and School Rules</i>
pupil using a blade to self-harm	<ul style="list-style-type: none"> • DT, Science and Maths departments have policies for issuing and storing scalpels, compasses etc. • teachers briefed on a need-to-know basis re. known self-harmers 	department policies

8. Risks from drugs and alcohol

Risk	Action taken to reduce risks	Cross-reference to Policy
pupil bringing in drugs to school / under influence of drugs	<ul style="list-style-type: none"> • robust Drugs Policy that allows for pupils in some circumstances to sign a contract • drugs dog brought into school periodically to act mainly as a deterrent • drugs education as part of PSHE • robust <i>Searches Policy</i> • 'I love you Mum' production (dealing with accidental death) seen by all Senior School pupils • parental talk on 'the party scene' by external speaker 	<i>Drugs Policy</i> <i>PSHE Schemes of Work</i> <i>Searches Policy</i>
pupil bringing in alcohol to school / under influence of alcohol	<ul style="list-style-type: none"> • misuse of alcohol covered in <i>Behaviour Policy</i> and <i>Code of Conduct and School Rules</i> • rules for alcohol consumption by pupils covered in 	department policies <i>Behaviour Policy</i> <i>Code of Conduct and School Rules</i>

	separate policy; same for staff <ul style="list-style-type: none"> • alcohol education as part of PSHE • robust <i>Searches Policy</i> 	<i>Consumption of Alcohol by Pupils Policy</i> <i>Consumption of Alcohol by Staff Policy</i> <i>PSHE Schemes of Work</i> <i>Searches Policy</i>
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9. Catering and cleaning

Pupil health is at risk from poor hygiene standards. Catering and cleaning at Freeman's are contracted out to Sodexo, which is a large company with its own comprehensive quality control and health & safety procedures. Sodexo share with us the findings of any Food Standards Agency inspections etc.. The Head of Operations meets weekly with Sodexo local management at which any concerns can be raised.

10. Risk from pupil illness, injury and allergic reactions

Please see *First Aid and Medicines Policy*, *Allergies Policy* and *Concussion Policy* for details. P.E. Department Handbook and risk assessments describe the measures taken to prevent pupil injury in sport. Hazardous on-site activities undertaken by CCF cadets, such as Airsoft shooting, are risk-assessed by the Contingent Commander. Likelihood and impact of everyday injuries caused by miadventure or bad behaviour is reduced by adequate and effective staff supervision, details of which can be found in our *Supervision Policy*.

Completion, recording, monitoring and evaluation of risk assessments

Risk assessments are undertaken by the member of staff responsible for the activity. Typically this is the Head of Department or Section Manager. Those responsible for risk assessment are identified in the School's *Risk Assessment Guide* and *Delegation of Health and Safety Responsibilities*.

Risk assessments are carried out using the *Initial Risk Assessment* form (see Appendix 1) before any new activity is undertaken to identify and mitigate potential risk. Protocols are then written and disseminated to relevant members of staff; personal protective equipment or other necessary items to mitigate risk are purchased; pupils/staff are instructed in the appropriate way to undertake the task and are supervised in doing so as appropriate. All risk assessments are reviewed annually by the responsible manager by updating the same risk assessment form. The review process is overseen and monitored by the HR Manager and current risk assessments are accessible to all staff via Sharepoint.

The quality and effectiveness of on-site risk assessments is evaluated by the Health and Safety Committee. At least annually, a selection of risk assessments are scrutinised by the Committee with a recommendation for further

Risk assessments for school trips and visits are drawn up by the Trip Leader tailoring a template *Trips Risk*

Assessment (see Appendix 2). It is deliberately presented in a format that makes it easy to use by colleagues who are less well versed in the methodology of formal risk assessments. Every TRA is checked and amended as appropriate by the EVC.

Accident reporting

The City of London has a telephone helpline for reporting all accidents and near misses that require a hospital visit. All such accidents are investigated by the appropriate member of staff and actions identified and followed up to avoid future accidents. These procedures make an important contribution to risk reduction.

Staff training on risk

Staff receive training to help them to identify risk and what steps to take if they do. For example, all staff participated in Health and Safety INSET in August 2019 delivered by a specialist external provider. Staff are also encouraged and reminded to report risks through the School's MICAD facilities system or, if urgent, directly to a member of SLT.

Training for risk assessors is undertaken as required by appropriately trained City of London or School staff. The HR Manager delivered risk assessment INSET briefing for all risk assessors in April 2018. At the same session, the EVC delivered training to all teachers on risk assessments for school trips and visits. Justin Tyas, Health & Safety Manager (People) for the City of London, has spent a great deal of time in Art and DT over the last couple of years helping them with their risk assessment and risk management.

Appendix 1- Initial Risk Assessment

Title:
Initial RA
Department:
Division:
Location:

Initial Risk Assessment



Risk Assessor:
Business Manager:

Signature: _____ Date: _____

Signature: _____ Date: _____

Description of Task:

Consequence		Likelihood		Risk
Describe the Hazard and how it might cause harm Reasonably Foreseeable Worst Case Injury	Rating L1,M2,H 3	Existing Control Measures and Justification	Rating L1,M2,H3	Consequence X Likelihood L1,L2,M3,M4,H6,H9

Appendix 2- School Trip Risk Assessment

RISK ASSESSMENT- PLEASE TAILOR TO YOUR TRIP BY ADDING OR DELETING

Trip Name: Date.....

GENERAL RISK What could go wrong?	SPECIFIC RISK What is specific to this trip that could go wrong ?	WHAT WE WILL DO IN ORDER TO CONTROL THE RISK
Missing Pupil		Call Reception to report any pupils that have not turned up for the trip (Junior - 01372 822482 or Senior 01372 822421)
Losing pupils		
Unaccompanied time		
Behaviour of pupils		
Travel accident		
Theft		
Terrorist incident (National Threat Level currently <i>Substantial</i>)		
Lost Property on Coach		
Inclement weather		
Trip staff unaware of pupil medical problems / allergies		
Medical care plans left behind		
Epipens left behind		

Communication home if trip back late/early		
Pupils getting home safely once dismissed		
Need to search a pupil outside England		<ul style="list-style-type: none"> - speak to Deputy Head prior to departure if unsure - remember not to rest on the School's Searches Policy - contact SLT before committing to any search - if SLT unavailable and cannot control risk of harm to pupils without a search, 'phone Police for assistance

Completed by:

Date: