

# **Risk Assessment Policy for Pupil Welfare**

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**Clifton College**  
September 2021

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## 1 Aims

- 1.1 This is the risk assessment policy for pupil welfare of Clifton College.
- 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 College's active approach to managing risk to pupil welfare;
  - 1.2.2 to implement a framework for the identification and assessment of risk(s) to pupil wellbeing<sup>1</sup> and a systematic approach to ensuring that appropriate action is taken to reduce the risks that are identified;
  - 1.2.3 to promote a child-centred approach to safeguarding and a culture of safety, equality and protection;
  - 1.2.4 to actively safeguard and promote the welfare and wellbeing of pupils of the College; and
  - 1.2.5 to consider welfare issues in a wider context rather than analysing single behaviours in order to make informed decisions.

## 2 Scope and application

- 2.1 This policy applies cross College, including the Early Years Foundation Stage (EYFS).

## 3 Regulatory framework

- 1.1 This policy has been prepared to meet the College's responsibilities under:
  - 1.1.1 Education (Independent College Standards) Regulations 2014, in particular Part 3, paragraph 16 which requires the proprietor to ensure that the welfare of pupils at the College 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<sup>2</sup>;
  - 1.1.2 *Boarding Colleges: national minimum standards* (Department for Education (DfE), April 2015) in particular Standard 3 which covers Boarders' health and wellbeing;]

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<sup>1</sup> Wellbeing means wellbeing within the meaning of section 10(2) of the Children Act 2004 and includes physical and mental health and emotional wellbeing; protection from harm and neglect; education training and recreation; the contribution made by them to society and social and economic wellbeing

<sup>2</sup> The standards and the guidance / commentaries on them do not prescribe whether the policy on risk assessment is set out separately from the health and safety policy, but we recommend that it is.

- 1.1.3 *Statutory framework for the Early Years Foundation Stage* (DfE, September 2021)
  - 1.1.4 Education and Skills Act 2008;
  - 1.1.5 Children Act 1989
  - 1.1.6 Childcare Act 2006
  - 1.1.7 Equality Act 2010
  - 1.1.8 Health and Safety at Work etc. Act 1974
  - 1.1.9 Data Protection Act 2018 and General Data Protection Regulation (GDPR) and
  - 1.1.10 Regulatory Reform (Fire Safety) Order 2005.
- 1.2 This policy has regard to the following guidance and advice:
- 1.2.1 The Independent College Standards Guidance for independent Colleges (DfE, April 2019) in particular paragraphs 4.26 - 4.28;
  - 1.2.2 Keeping children safe in education (DfE, September 2021) (**KCSIE**);
  - 1.2.3 Working together to safeguard children (HM Government, July 2018);
  - 1.2.4 Revised Prevent duty guidance for England and Wales (HM Government, April 2019);
  - 1.2.5 Prevent duty: departmental advice for Colleges and childcare providers (DfE, June 2015);
  - 1.2.6 Preventing and tackling bullying: advice for headteachers, staff and governing bodies (DfE, July 2017);
  - 1.2.7 Advice and Guidance: How can we stop prejudice-based bullying in Colleges? (Equality and Human Rights Commission);
  - 1.2.8 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, July 2018);
  - 1.2.9 Sexual violence and sexual harassment between children in Colleges and colleges (DfE, September 2021);
  - 1.2.10 Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance (DfE, July 2020).

1.3 The College policies, procedures and resource materials that are relevant to this policy are set out under the heading "College policies". This Policy should be read in conjunction with those.

## 2 **Publication and availability**

2.1 This policy is published on the College website.

2.2 This policy is available in hard copy on request.

2.3 A copy of the policy is available for inspection on the College's Resource Centre.

2.4 This policy can be made available in large print or other accessible format if required.

## 3 **Definitions**

3.1 Where the following words or phrases are used in this policy:

3.1.1 References to the **Proprietor** are references to the College Council.

## 4 **Responsibility statement and allocation of tasks**

4.1 The Proprietor has overall responsibility for all matters which are the subject of this policy<sup>3</sup>.

4.2 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>  |
|--|---|------------------------------------|
| Approval of risk assessments   | Designated Safeguarding Lead (DSL) <sup>4</sup> | Ongoing, as completed              |
| Keeping the policy up to date and compliant with the law and best practice                     | DSL   | As required, and at least annually |
| Monitoring the implementation of the policy, relevant risk assessments and any action taken in | DSL   | As required, ongoing               |

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<sup>3</sup> The College is reminded of the Part 8, para 34 obligation on proprietors to ensure that persons with leadership and management responsibilities at the College actively promote the wellbeing of pupils. The ISI Commentary reminds proprietors that the ethos of any College should be to develop and nurture the wellbeing of pupils.

<sup>4</sup> Ensure signatories are cross referenced in policy table below, clause 21 and appendix 3.

|  |            |                                    |
|--|------------|------------------------------------|
| response and evaluating effectiveness.   |            |                                    |
| Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the College's processes under the policy | DSL        | As required, and at least annually |
| Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR         | DSL        | As required, and at least annually |
| Formal annual review   | Proprietor | Annually                           |

## 5 Pupil welfare

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

- 5.1.1 to promote a child centred and co-ordinated approach to safeguard pupils' welfare
- 5.1.2 to support pupils' physical and mental health and emotional wellbeing (as well as their social and economic wellbeing);
- 5.1.3 to identify children who may benefit from early help, those who may be in need and / or those suffering, or likely to suffer, harm;<sup>5</sup>
- 5.1.4 to protect pupils from all types of abuse, violence, sexual violence, harassment, and exploitation and neglect;
- 5.1.5 to recognise that corporal punishment can never be justified;
- 5.1.6 to provide pupils with appropriate education, training and recreation to keep themselves safe and well, including PSHE Education, Relationships Education and Relationships and Sex Education;
- 5.1.7 to encourage pupils to report concerns and to contribute to society;

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<sup>5</sup> See paragraph 172 of KCSIE 2021

- 5.1.8 to protect pupils from the risk of honour based abuse, FGM, radicalisation, extremism and being drawn into terrorism, modern slavery and human trafficking, by actively promoting fundamental British values and providing appropriate support to those assessed as being vulnerable;
  - 5.1.9 to ensure that pupils are provided with a safe and healthy environment so far as reasonably practicable;
  - 5.1.10 to promote a whole College approach to online safety and to protect pupils from the risks arising from the use of technology;
  - 5.1.11 to listen to and respect pupils and in particular to listen to pupils' complaints and concerns, to complaints and concerns raised by others about pupil wellbeing / welfare<sup>6</sup> and to investigate and manage such concerns effectively, and
  - 5.1.12 consult with stakeholders about issues of pupil welfare and ensures that appropriate training and support is provided to pupils and to parents.
- 5.2 The College recognises that individual pupils may have needs which arise from physical, medical, sensory, learning, emotional or behavioural difficulties which require provision additional to or different from that generally required by children of the same age in mainstream Colleges. The College 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 College's responsibilities to promote and safeguard the welfare of all its pupils.
- 5.3 In addition, when carrying out its assessments, the College will endeavour to take into account all relevant factors <sup>7</sup>including, where appropriate:
- 5.3.1 a pupil's wishes and feelings, wherever possible;
  - 5.3.2 a pupil's developmental needs;
  - 5.3.3 their family circumstances;
  - 5.3.4 the wider community context in which they are living;
  - 5.3.5 wider contextual issues such as environmental and / or other extra-familial threats and / or new and emerging threats e.g. online threats.
- 5.4 The College addresses its commitment to these principles through prevention and protection measures.

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<sup>6</sup> Including reviewing feedback from independent listeners if there is boarding provision

<sup>7</sup> See list at Appendix 2

- 5.5 **Prevention:** ensuring that all reasonable measures are taken to minimise the risk of harm<sup>8</sup> to pupils and their welfare by:
- 5.5.1 ensuring through training that all staff are aware of and committed to this policy and the values set out;
  - 5.5.2 establishing a positive, supportive and secure environment in which pupils can learn and develop;
  - 5.5.3 creating a culture and environment that promotes pupil welfare, deters abuse and challenges inappropriate behaviour;
  - 5.5.4 including in the curriculum, sport and recreation arrangements, boarding provision, activities and opportunities for personal, social, health and economic education (**PSHE**), Relationships Education and Relationships and Sex Education which equip pupils with skills to enable them to protect their own welfare and that of others;
  - 5.5.5 providing medical and pastoral support that is accessible and available to all pupils;
  - 5.5.6 providing pupils with the confidence to raise any problems, concerns or complaints they may have;<sup>9</sup>
  - 5.5.7 providing support as soon as a problem emerges at any point in a child's life and taking appropriate action in accordance with the Bristol Safeguarding Partners' referral threshold document. The College will, in particular, be alert to signs of abuse and neglect, signs of serious violence and to the potential need for early help for a child who:
    - (a) is disabled and has specific additional needs or has certain health conditions;
    - (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 or county lines;
    - (e) is frequently missing / goes missing from care or from home;

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<sup>8</sup> The harm test is explained on the Disclosure and Barring service (DBS) website on [GOV.UK](https://www.gov.uk)

<sup>9</sup> NMS 17 and Appendix 1 requires boarding Colleges to have a pupil complaints procedure but good practice for all Colleges



- (f) is at risk of modern slavery, trafficking and exploitation;
- (g) has a family member in prison or is affected by parental offendings
- (h) is at risk of being radicalised or exploited;
- (i) is in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health issues and domestic abuse;
- (j) is misusing drugs or alcohol themselves;
- (k) is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- (l) is looked after or has returned home to their family from care;
- (m) is persistently absent from education, including persistent absences for part of the school day.
- (n) is a privately fostered child.

5.6 **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:

- 5.6.1 having a zero-tolerance attitude to abuse, maintaining an attitude of "it could happen here";
- 5.6.2 ensuring that pupils, staff and others, where necessary, are aware of the College's relevant processes and procedures and what is expected of them;
- 5.6.3 taking immediate and appropriate action in response to concerns about a child's welfare (even if they are considered to be low level and/or they do not presently meet the harm thresholds<sup>10</sup>) and by keeping appropriate records;
- 5.6.4 proactively sharing information in order to promote the welfare and protect the safety of pupils within the College and with appropriate agencies and involving pupils and their parents appropriately;
- 5.6.5 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;

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<sup>10</sup> See Part 4 of KCSIE

- 5.6.6 being aware of changing or emerging threats to pupil welfare such as COVID-19, increased reports of peer on peer abuse or emerging online or technological issues
- 5.6.7 when concerned about the welfare of a child, staff should always act in the best interests of the child.
- 5.7 The College recognises that pupil welfare and wellbeing can be adversely affected by many matters whether in or away from College, including abuse, bullying, violence and harassment, radicalisation, behavioural and health issues, including mental health issues.

## 6 College policies

- 6.1 The College 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 / children missing education                              | DSL  |
| Anti-bullying   | DSL  |
| Behaviour and discipline / smoking, alcohol and the misuse of drugs and substances policy | DSL  |
| Acceptable use policy for pupils  | DSL  |
| Online safety policy  | E-Safety Officer(s)  |
| Health and safety / security policy   | Health and Safety Officer  |
| First aid policy  | Health and Safety Officer  |
| Administration of medicines / supporting pupils at College with medical conditions        | Head College Nurse   |
| Medical policy / care of boarders who are unwell  |  |
| Special educational needs and learning difficulties policy                                | SENCO  |
| Accessibility plan  | Chaplain   |

|  |                                     |
|--|-------------------------------------|
| Educational visits policy  | EVC                                 |
| Visitors and security policy <sup>11</sup>                             | DSL                                 |
| Recruitment, selection and disclosure policy and procedure             | Director of People and Organisation |
| Pupil complaints procedures  | Head of College                     |
| Risk assessment for out of hours/out of term safeguarding arrangements | DSL/DSL                             |

## 7 Risk assessment

- 7.1 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 in accordance with the College's relevant policies or procedures as detailed above. The assessment and actions identified will usually be recorded in writing and regularly monitored and reviewed. More guidance on risk assessment can be found in Appendix 1 and Appendix 2.
- 7.2 The format of risk assessment may vary and may be included as part of the College'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 3. Regardless of the approach taken or form used, the College's approach to promoting pupil welfare will be systematic and pupil-focused.
- 7.3 The information obtained through this process and the actions 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.
- 7.4 The College uses Child Protection Online Monitoring System (CPOMS) to record and monitor all concerns for the pupils.

## 8 Safeguarding / child protection

- 8.1 The College has safeguarding policies and processes in place that reflect national safeguarding requirements and the Bristol safeguarding partners procedures and practices, including local protocols for assessment and threshold document.
- 8.2 The College's policies and processes ensure that all members of the College community understand that safeguarding is everyone's responsibility. They have

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<sup>11</sup> If College has a separate access to College premises by people outside the College and / or supervision of ancillary contract and unchecked staff include references to them in this table

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:

- 8.2.1 immediately where a child is in immediate danger or is at risk of harm;
  - 8.2.2 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);
  - 8.2.3 any child who may require an early help assessment;
  - 8.2.4 any child where there are concerns regarding female genital mutilation (**FGM**);
  - 8.2.5 any child where there are concerns about sexual violence and / or sexual harassment; and
  - 8.2.6 any concern about another staff member who may pose a risk of harm to children.
- 8.3 The College's policies and processes describe and reinforce how the College works with children's social care, the local authority designated officer (LADO), the police, health services and other services to promote the welfare of children and protect them from harm. This includes:
- 8.3.1 providing a coordinated offer of early help when appropriate;
  - 8.3.2 contributing to inter-agency plans to provide additional support to children subject to child protection plans;
  - 8.3.3 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;
  - 8.3.4 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 College's internal processes and procedures; and
  - 8.3.5 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.

- 8.4 Full details of the College's safeguarding procedures are set out in the Safeguarding and Protecting Children Policy. Details of the College's online safety strategy are set out in the E-safety policy.
- 8.5 The College's process for safer recruitment is detailed in the recruitment, selection and disclosure policy and procedure.

## 9 **Protection from radicalisation and extremism**

- 9.1 Details of the College's procedures to prevent pupils from becoming radicalised and / or being drawn into extremism and / or terrorism are set out in the Safeguarding and Protecting Children Policy.
- 9.2 The College 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.
- 9.3 The College 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.
- 9.4 The College 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 College premises.

## 10 **Anti-bullying**

- 10.1 The College is committed to preventing bullying and has a written anti-bullying policy which covers the College's approach to the management of bullying, cyberbullying, prejudice-based bullying and peer on peer abuse.
- 10.2 Bullying can happen to all pupils and the College 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.
- 10.3 The College 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.
- 10.4 Low level disruption and harmful behaviour (including low level sexualised behaviour) is tackled at an early stage to prevent negative behaviours escalating.

## 11 Behaviour

- 11.1 The College 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.
- 11.2 This policy contains further information about the College'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.

## 12 Health and safety

- 12.1 The College has a duty to ensure the health, safety and welfare of employees and the health and safety of pupils and others affected by the College's operations, so far as is reasonably practicable.
- 12.2 The College will meet this requirement by taking a sensible, proportionate and holistic approach to management of health and safety issues in accordance with the College'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.

## 13 Special educational needs

- 13.1 The College will make appropriate arrangements to identify and support all pupils with special educational needs, whether or not they have the benefit of a statement of special educational needs or an Education, Health and Care Plan as set out in the special educational needs and learning difficulties (SEND) policy and whether or not they have a disability within the meaning of the Equality Act 2010 and acknowledges that these pupils are at greater risk.

## 14 Medical issues

- 14.1 The College has a duty to make appropriate arrangements for:
  - 14.1.1 first aid, to ensure that it is administered to anyone who requires it in a timely and competent manner;
  - 14.1.2 the administration of medicine to pupils;
  - 14.1.3 the care of boarders who are unwell;
  - 14.1.4 supporting pupils with medical conditions (including eating disorders and mental health conditions).
- 14.2 Details of the College's arrangements for these are set out in the relevant medical policies.

## 15 **Recruitment-related issues**

- 15.1 Details of the College's procedures on recruitment-related issues such as selection, Disclosure and Barring Service (**DBS**) checks (including late DBS checks) and disclosure are set out in the College's recruitment policy.

## 16 **Reporting and information-sharing**

- 16.1 When assessing risks to pupil welfare and wellbeing at the College, all staff should also consider whether the matter should be reported internally and / or 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, Ofsted, Child and adolescent mental health services (**CAMHS**) and / or the Charity Commission.
- 16.2 The procedures for reporting safeguarding concerns are set out in the College's Safeguarding and Protecting Children Policy.
- 16.3 The College 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 College's paramount concern.
- 16.4 In particular, the College 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.

The College monitors pupil attendance and shall inform the applicable local authority in the appropriate circumstances of any pupil who is going to be added to or deleted from the College's admission register. The School will consider whether it is necessary to liaise with the local authority in circumstances where a parent has expressed an intention to home educate a pupil.

16.5

## 17 **Training**

- 17.1 The College 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.
- 17.2 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.
- 17.3 The College maintains written records of all staff training.

## 18 Record keeping

The College will retain records of the significant findings of all welfare concerns, discussions and decisions made and the reasons for those decisions. This likely to include 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 to reduce the risks identified and any reviews of these.

18.1 All records created in accordance with this policy are managed in accordance with the College's policies that apply to the retention and destruction of records.

18.2 The records created in accordance with this policy may contain personal data. The College has a number of privacy notices which explain how the College uses personal data about pupils and parents. The privacy notices are published on the College's website. In addition, staff must ensure that they follow the College's data protection policies and procedures when handling personal data created in connection with this policy. This includes the College's data protection policy.

## 19 Monitoring and review

19.1 Relevant risk assessments and any action taken in response to risk assessments will be monitored regularly in order to ensure that pupil welfare issues are being appropriately managed, and to ensure that any potential patterns are identified, including patterns of low-level concerning, problematic or inappropriate behaviour.

19.2 This policy will be monitored by the DSL annually.

19.3 In the monitoring and review of relevant risk assessments and this policy any steps to address concerns or improve systems will be taken to manage these by the DSL within a reasonable time.

## 20 Version control

|                                     |                 |
|-------------------------------------|-----------------|
| Date of adoption of this policy     | 01/09/2021      |
| Date of last review of this policy  | 19/08/2021      |
| Date for next review of this policy | 19/08/2021      |
| Policy owner ( <b>SLT</b> )         | DSL             |
| Policy owner                        | Head of College |



## **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 College 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.

Risk assessments will be concise and focused on determining appropriate ways to eliminate a hazard, or control the risk when a hazard cannot be eliminated. When thinking about your risk assessment in this context, remember:

- a welfare issue is anything that may harm a pupil; to include cyber-bullying, sexual violence or harassment, 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. Complete a separate pupil welfare risk assessment for each pupil and use the Checklist in Appendix 2 to help identify risks and protective factors.

### **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: Relevant consultation**

Meet with the pupil, pupil's parent(s) or carer(s) or third party e.g. professional involved with the pupil to discuss the risks and wishes and feelings of the pupil if appropriate.

### **Step 5: 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 College has in place to control those risks. Record these on CPOMS.

There is no prescribed format for this record but any record produced should be simple and focussed on control measures and the steps the College proposes to take to manage the risk. The College will record the risk assessment in the form set out in Appendix 3.

If the assessment is that the behaviour is of such high risk even with control measures in place that it could not be adequately managed in the College setting, consideration will need to be given to alternative plans for managing the pupil(s) presenting the alleged behaviour.

### **Step 6: 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 College 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 (Non-exhaustive) Checklist of factors to consider for a risk assessment of pupil welfare**

In assessing the risks, the assessor should consider the factors listed below as well as using the factors to consider any involvement from outside agencies, for example requests for Early Help. The factors should be used to assess the nature and level of risk posed and / or faced by the pupil(s) in College including in relation to location, activities, contact with specific pupils, transport to and from College and contexts outside College.

### **Child's developmental needs**

**Age and understanding:** e.g. developmental stage, concerns about developmental delay

**Health:** e.g. physical health issue e.g. serious allergies / disability, mental health issue e.g. depression, self-harm, exhibits signs of an eating disorder, drug or alcohol use, smoking, suspicion of child being prepared for FGM, unsafe / inappropriate / abusive sexual behaviour, unmet medical needs e.g. failure to access medical attention, concerns about developmental delay.

**Education:** e.g. at risk of peer on peer abuse, exclusions, missing from education (including for parts of the school day), frequent moves of College, behaviour record, SEND needs e.g. ASD, under / over achiever, poor home-College relationship.

**Emotional and Behavioural development:** e.g. display of extremist views, anti-social behaviour, illegal / offending behaviour, personality trait issues e.g. self-imposed goals, a one off incident or sustained pattern, is the behaviour at risk of escalating, what is the frequency of the behaviour.

**Identity:** e.g. gender, low self-esteem.

**Family and Social relationships:** e.g. power imbalance, peer groups, social media / internet use, risk of bullying / being bullied, risk of sexual harassment and / or sexual violence, child / young person beyond parental control, at risk of modern slavery, trafficking or child sexual or child criminal exploitation, is frequently missing / goes missing from care or from home, concerns about any other adult, including a staff member.

**Social Presentation:** e.g. social problems, lack of friendship groups, child's online presence.

**Self-care Skills:** e.g. lack of care of appearance, lack of personal hygiene, unsuitable clothing.

**Child's wishes and views:** e.g. reporting to police, choice.

## **Family and environmental factors**

**Family History and Functioning:** e.g. boarder, divorce, parental relationship tensions e.g. potential breakup / difficulties with step parent, domestic violence, single parent, absent parents, challenging sibling, Looked After Child, previous involvement with CSC, adopted child, privately fostered child, loss of significant adult, parental imprisonment, caring responsibilities, mental health issues.

**Anti-social or criminal behaviour:** eg: showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

**Housing, Employment and Finance:** e.g. loss of parental income / job, inappropriate housing, asylum seeker.

**Family's Social Integration:** e.g. lack of support networks, family socially excluded.

**Community Resources:** e.g. negativity towards family, non-engagement with services.

## **Parents and Carers**

**Basic Care, Safety and Protection:** e.g. suspected / actual physical / emotional / or sexual abuse or neglect, appropriate supervision e.g. nannies / drivers / home alone arrangements.

**Parental health problems:** young carer, serious illness in family, drug / alcohol dependent parent and parent mental health issues.

**Emotional Warmth:** e.g. expectations of performance / pressure to achieve, poor attachment.

**Guidance, Boundaries and Stimulation:** e.g. boundaries unclear / not enforced, parents involved with criminal activity.

### Appendix 3 Example template risk assessment

**Concern / welfare issue:**

**Person(s) who may be relevant to the concern:** [name of pupil(s), e.g. alleged victim, alleged perpetrator, bystanders, all pupils, staff]<sup>12</sup>

**Person(s) consulted for the purposes of the risk assessment:** [names of pupil(s), parents / carers, staff, third parties e.g. a professionals, police, CSC]

**Other organisations to be contacted:** [e.g. other College, reporting obligations]

**Issues relating to confidentiality:**

| What are the risks / causes of harm?        | Who might be harmed and how? | How might they be harmed? What are the factors to be assessed?              | What is the level of risk?<br>L/M/H | What measures are already in place?                             | What further action is necessary?   | Action by whom?                     | Action by when?                | What is the new level of risk?<br>L/M/H | Action completed?                                | Review date<br>By Whom?<br>Comments |
|---|------------------------------|---|-------------------------------------|---|---|-------------------------------------|--------------------------------|---|--|-------------------------------------|
| e.g. alleged bullying of Pupil A by Pupil B | Pupil A                      | Childs Development Needs<br>Pupil A exhibits behaviour that is below an age | M                                   | Both pupils have been interviewed and investigation is ongoing. | Pupil A should not sit next to Pupil B in class.<br>Lunchtime staff and playground supervisors to | Class teacher<br><br>Lunch time and | Immediately<br><br>Immediately | L                                       | Yes - communicated to staff on [• 00 month year] | 3 weeks<br>Class teacher            |

<sup>12</sup> Drafting note - staff at risk will not be assessed under this policy.

|  |   |   |          |  |  |                               |                    |          |  |                            |
|--|---|---|----------|--|--|-------------------------------|--------------------|----------|--|----------------------------|
|  |   | <p>expected level, recorded developmental delay.</p> <p>Potential power imbalance between Pupil A and B.</p> <p>Pupil B potentially developing a pattern of behaviour, second incident.</p> |          |  | <p>keep an eye on Pupils A and B at break times and report any incidents to [• name].</p>                    | <p>playground supervisors</p> |                    |          |  |                            |
| <p>Pupil A has been overheard telling Pupil B that [• he / she] intends to travel to</p> | <p>Pupil A, (Pupil B and other pupils not currently subject to a separate risk assessment.)</p> | <p>Childs Development Needs Behaviour log records many incidents of concern.</p>  | <p>H</p> | <p>Both Pupil A and B have been spoken to and interviewed by the DSL and the parents, the police and children's social</p> | <p>Pupil A should be referred to the Channel Programme. Obtain pupil and parent consent to engage in the</p> | <p>DSL<br/><br/>DSL</p>       | <p>Immediately</p> | <p>M</p> | <p>Yes<br/><br/>Referred to the Channel Programme on [• 00 month year]</p> | <p>1 week<br/><br/>DSL</p> |

|   |  |  |   |   |   |                           |             |   |  |   |
|---|--|--|---|---|---|---------------------------|-------------|---|--|---|
| Syria to live a better life.  |  | Low self-esteem<br><br>Online presence suggests possible involvement with persons with known extreme views.  |   | services have been informed.  | Channel programme   |                           |             |   |  |   |
| e.g. Pupil A has alleged that she was sexually touched by Pupil B on the bus on the way to College. | Pupil A, (Pupil B and other pupils subject to own separate risk assessment.) | Childs Development Needs<br>Pupil A has ongoing SEND needs.<br>Lack of peer relationships for pupil A.<br>Potential power imbalance between pupil A and B. | H | Referral has been made to children's social care on the same day, submitting a MARF (Multi Agency Referral Form) for both children. The MARF led to immediate police involvement. | Pupil B to have an amended timetable so that he is not in any class with Pupil A (to be kept under review pending further advice from authorities)<br>Specific teaching staff | DSL<br><br>Teaching staff | Immediately | M | Yes<br>Pupil B timetable amended.<br>Specific staff informed.<br>Trusted adult agreed with Pupil A | 3 days or immediately upon contact from CSC / police<br><br>Consideration to be given to aspects of College's systems e.g. staff training on peer on peer abuse |

|  |  |  |  |  |   |               |  |  |  |  |
|--|--|--|--|--|---|---------------|--|--|--|--|
|  |  | Has Pupil A suffered physical harm due to Pupil B's alleged actions. |  | There are presently no bail conditions or recommendations that Pupil B is suspended. | to be briefed on the need to ensure the children are not together. 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 | Trusted adult |  |  |  |  |
|--|--|--|--|--|---|---------------|--|--|--|--|

**Risk assessment undertaken by:**

Tim Greene, Head of College

**Date:**

31/08/2021

**Authorised by**

Mark Eldridge, Chair of the Safeguarding and Welfare Committee



**Signed:**

A handwritten signature in blue ink, appearing to read "Mark Langford". The signature is written in a cursive style with a long, sweeping underline.

**Date:** 31/08/2021

**Review date:** 31/08/2022