Risk Assessment Policy

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1. Introduction

Keys Group is committed to providing a safe, nurturing, and enabling environment for pupils with complex needs and challenging behaviours. Effective risk assessment is fundamental to safeguarding pupils, staff, and visitors, and supports positive risk-taking essential for learning and development.

This policy sets out the framework for identifying, assessing, managing, and reviewing risks within the school to ensure the wellbeing of all stakeholders.

2. Scope

This policy applies to all staff, including permanent, temporary, and contractors, across the school. It covers all activities, environments, and situations where pupils and staff may be exposed to risk.

3. Legal and Regulatory Framework

This policy aligns with the Independent School Standards (ISS), Part 3, paragraph 16, which requires schools to have effective arrangements for assessing and managing risk to ensure pupil welfare and safety. This policy also complies with current legislation and guidance, including but not limited to:

- Data Protection Act 2018 & UK GDPR
- SEND Code of Practice 0–25 (2015)
- Health and Safety at Work etc. Act 1974
- Equality Act 2010
- Education and Inspections Act 2006
- Education Act 2002 (Section 175)
- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children 2018
- OFSTED Inspection Framework (2025)

4. Definitions

Term	Definition
Risk	The possibility that an action or event may cause harm.
Risk Assessment	A systematic process of identifying, evaluating, and controlling risks.
Inherent Risk	The level of risk before any control measures are applied.
Residual Risk	The level of risk remaining after control measures have been implemented.
Protective Factors	Conditions or actions that reduce the likelihood or impact of risk.
Shared Risk Approach	A collaborative process involving all relevant stakeholders to manage high or complex risks.

5. Principles of Risk Management

- Risk management is a continuous, dynamic process informed by multiple sources including pupil input.
- It balances safeguarding with enabling pupils to take positive risks that promote growth and independence.
- All staff collaborate with families, professionals, and pupils to manage risks effectively.
- Control measures are proportionate, clear, and based on best practice and legislation.
- Documentation is accurate, timely, and shared appropriately.
- The graduated approach of assess, plan, do, review is embedded in understanding and responding to pupil needs (EEF recommendation).
- We recognise that managing high-risk situations and supporting pupils with complex needs can be emotionally demanding for staff. The school is committed to promoting staff wellbeing by:
    - Providing regular supervision, reflective practice opportunities, and access to professional support.
    - Ensuring ongoing training and development to build confidence and competence in risk management.
    - Encouraging a supportive team culture where staff can share concerns and successes.

- Monitoring workload and stress levels, with proactive measures to prevent burnout.

This approach supports staff resilience, ensuring high-quality, consistent care for pupils.

6. Risk Assessment and Management Process

Stage 1: Identify

- Systematically identify hazards, risks, and triggers using observations, pupil history, professional input, and environmental factors.

Stage 2: Assess

- Evaluate likelihood and consequence using professional judgement and structured tools such as the Risk Rating Matrix (Appendix 1).
- Consider protective factors and pupil strengths.

Stage 3: Control

- Develop pupil-centred risk management plans with specific preventative, responsive, and recovery measures.
- Include school uniform/dress code and jewellery policy as a preventative measure to reduce risk of injury and promote safety. Exceptions are risk-assessed individually.
- Reference relevant plans such as behaviour management plans, education health care plans, and clinical advice.

Stage 4: Implement

- Communicate risk assessments and control plans clearly to all relevant staff and stakeholders.
- Ensure consistent application through training, supervision, and monitoring.

Stage 5: Monitor and Review

- Risk assessments must be promptly reviewed and updated following any incident, significant change in pupil behaviour, or environmental change.
- Reviews occur at least termly and involve pupils, families, and multi-agency partners to ensure ongoing relevance and effectiveness.

7. Shared Risk Approach

- High or complex risks require joint decision-making with all stakeholders using the Shared Risk Approach protocol (Appendix 2).
- Actions and decisions are documented and reviewed regularly, typically fortnightly or more frequently.
- Escalate unresolved risks promptly to senior leadership and the Director of Education.

8. Roles and Responsibilities

Role	Responsibilities
Regional/Education Director	Approve and oversee risk management policy; ensure resources and training are in place.
Headteacher	Lead risk management locally; ensure staff are trained and supported; oversee risk plans.
All Staff	Identify, assess, manage risks; follow plans; report concerns promptly.
Quality Assurance Team	Monitor and evaluate risk management effectiveness; support continuous improvement.
Regional Executive Headteachers	Support schools in compliance; escalate high risks as necessary.
Learning and Development	Provide training and development in risk assessment and management.

9. Training and Competency

- All staff complete mandatory training in risk management and safer caring as part of induction and ongoing development.
- Staff responsible for risk documentation complete competency workbooks and receive supervision.
- Leadership ensures ongoing professional development and quality assurance.

10. Monitoring and Review

- Risk management practice is regularly monitored through supervision, incident analysis, and quality assurance.
- Multi-disciplinary meetings include risk discussions to share learning and ensure consistency.
- This policy is reviewed annually or sooner in response to changes in legislation or practice.

11. Equality and Inclusion

Keys Group is committed to equality and diversity. Risk assessments and management must be applied with sensitivity to race, faith, gender, disability, and other protected characteristics. Adjustments to plans should be made to ensure fairness and inclusion.

12. Documentation and Confidentiality

- Risk assessments and related documents must be stored securely in line with Data Protection legislation. All individual pupil risk assessments should be securely stored in a pupil's profile on Arbor. All activity-based risk assessments should be stored in the Keys Education Portal so that they are accessible to staff.
- Information is shared on a need-to-know basis with relevant staff and external professionals.
- Confidentiality is maintained at all times respecting pupil and family privacy.

13. Technology and Online Safety

Risk assessments consider potential digital and online risks relevant to each pupil, including:

- Access to inappropriate content or contact online.
- Cyberbullying or online harassment.
- Use of devices and social media platforms.

Control measures include:

- Implementing appropriate filtering and monitoring systems.
- Educating pupils about safe and responsible online behaviour.
- Collaborating with families and external agencies to manage online risks.

This ensures a holistic approach to safeguarding in the digital environment.

14. Invacuation Procedure

14.1 Purpose

The invacuation procedure ensures the safety of pupils, staff, and visitors by providing clear guidance on how to respond when it is necessary to remain inside the building due to an external threat or emergency.

14.2 Scope

This procedure applies to all staff, pupils, and visitors across all Keys Group school sites.

14.3 Definition

Invacuation refers to the process of securing the school building and keeping all occupants inside to protect them from external hazards such as security threats, severe weather, or environmental dangers.

14.4 Triggers for Invacuation

Examples include but are not limited to:

- Intruder or security threat on or near site
- Severe weather events (e.g., tornado, severe storm)

- Nearby chemical or environmental hazard
- Police or emergency services advice

14.5 Roles and Responsibilities

Role	Responsibility
Headteacher / Site Leader	Initiate invacuation, communicate with emergency services, and oversee procedure implementation
All Staff	Follow invacuation instructions promptly, support pupils, and ensure all are accounted for
Support Staff	Assist pupils with additional needs to reach safe areas

14.6 Invacuation Steps

1. **Alert:** The Headteacher or designated person activates the invacuation alarm or communicates the need to invacuate via internal systems.
2. **Secure:** Immediately lock all external doors and windows.
3. **Assemble:** Pupils and staff move calmly to designated safe areas within the building.
4. **Account:** Staff conduct roll call to ensure all pupils and personnel are present.
5. **Remain:** Stay in safe areas until the all-clear is given by the Headteacher or emergency services.
6. **Communicate:** Maintain communication with emergency services and provide updates to staff and parents as appropriate.

14.7 Designated Safe Areas

Each school site must have clearly identified and communicated safe areas for invacuation that:-

- Are away from external windows and doors
- Provide shelter and protection
- Are accessible to pupils with disabilities

14.8 Training and Drills

- Invacuation drills will be conducted termly to ensure staff and pupils are familiar with procedures.
- Staff training on invacuation forms part of induction and ongoing professional development.

14.9 Monitoring and Review

- The invacuation procedure will be reviewed annually or following any incident requiring activation.
- Feedback from drills and actual invacuations will inform updates to improve effectiveness

Refer to Appendix 7 for details of how this procedure is implemented within the school.

Appendix 1: Individual Risk Assessment Guidance

Introduction

An individual risk assessment is a systematic process to identify, evaluate, and manage potential risks related to a pupil's behaviour, environment, or activities. The purpose is to safeguard pupils, staff, and others while supporting positive risk-taking that promotes development and independence.

Key Principles

- Risk assessments must be clear, specific, and unambiguous, written as if the reader is unfamiliar with the pupil.
- They must be pupil-centred and informed by multi-disciplinary input, including the pupil where appropriate.
- Risk assessments are dynamic documents, regularly reviewed and updated in response to new information or incidents.
- The Shared Risk Approach protocol must be followed for high or complex risks, ensuring collaborative decision-making.
- Language should be professional, objective, and free from jargon or abbreviations unless clearly explained.

Structure of the Individual Risk Assessment

Section	Description
Pupil Details	Full name, date of birth, school, date of assessment, author, contributors, and revision dates.
1. Risk Title and Residual Risk Level	Clearly state the risk being assessed and the residual risk level (Low, Medium, High) after controls. Include likelihood and consequence scores.
2. Understanding the Risk	Identify who is at risk (pupil, staff, others). Summarise previous occurrences and historical information referencing relevant documents. List hazards, triggers, and specific indicators of increased risk.
3. Presenting (Inherent) Risk Assessment	Use the Risk Rating Matrix to score the risk before controls are applied. This guides urgency and intervention level.
4. Control Measures	Detailed and specific measures to be applied: - Before (Preventative): Actions to reduce risk likelihood. - During (Responsive): Steps to manage incidents safely.

Section	Description
	- After (Recovery and Learning): Post-incident support, debrief, and plan updates. Reference relevant plans and professional advice.
5. Review and Evaluation	Record reviews by relevant staff and professionals, noting comments and changes. Reviews should be regular and triggered by incidents or new information. Multi-agency involvement is essential.
6. Acknowledgement	Signatures from staff, parents/carers, social workers, and pupil (where appropriate) to confirm understanding and compliance.

Writing Tips

- Write in clear, concise sentences.
- Avoid abbreviations unless defined on first use.
- Use person-centred language, respectful and inclusive.
- Avoid vague terms; describe specific behaviours or signs.
- Use the graduated ‘assess, plan, do, review’ approach to ensure ongoing evaluation.

Appendix 2: Good Reporting Writing Guide

Purpose

This guide supports staff in producing professional, accurate, and meaningful risk assessment reports and documentation.

Key Principles

- Clarity: Use straightforward language. Avoid jargon and technical abbreviations unless necessary and defined.
- Objectivity: Report facts and observations without personal opinions. Use evidence-based descriptions.
- Pupil-Centred: Focus on the pupil's context, needs, and strengths. Use respectful language.
- Accuracy: Ensure all information is correct, up to date, and referenced where applicable.
- Timeliness: Complete reports promptly to support effective decision-making and safeguarding.

Style and Language

- Use pupil consistently when referring to those in education (unless the school's own terminology differs).
- Refer to individuals by their titles rather than names (e.g., "the headteacher," "the social worker").
- Avoid contractions (write "do not" rather than "don't").
- Use sentence case for titles and headings (e.g., "Risk assessment review," not "Risk Assessment Review").
- Use the Oxford comma in lists for clarity (e.g., "English, mathematics, science, and physical education").
- Spell out terms fully on first use, followed by the abbreviation in brackets if used repeatedly (e.g., Education Health Care Plan (EHCP)).
- Avoid overloading sentences with abbreviations or acronyms.
- Use inclusive language: "pupils who have special educational needs or disability."
- Use active voice where possible (e.g., "Staff monitor behaviour" rather than "Behaviour is monitored by staff").
- Use one space after full stops.

Lists and Formatting

- Use bulleted lists unless order or priority matters, then use numbered lists.
- Ensure list items have consistent grammatical structure (e.g., all phrases or all full sentences).
- Begin list items with lowercase letters unless they are full sentences, which should start with capitals and end with full stops.
- Avoid using “and” or “or” within bulleted lists.
- Use fully justified text for professional documents.
- Use Open Sans font, size 11 for body text and Lato font, size 16 for headings.

Dates and Numbers

- Use the format day month year (e.g., “Tuesday 13 September 2022”).
- Express academic years as 2024/25.
- Spell out numbers one to nine; use numerals for 10 and above unless starting a sentence.

Appendix 3: Risk Rating Matrix

Consequence Level	Description	Examples
1 - Insignificant	No or minor injury; no lasting impact	Quick resolution; no impact on others
2 - Minor	Minor injury; first aid needed	Temporary impact; minor damage
3 - Moderate	Injury requiring hospital attendance	Police involvement; impact on others
4 - Major	Serious injury or long-term illness	Multi-agency involvement; major damage
5 - Catastrophic	Fatality or permanent disability	Profound and enduring effects

Likelihood Level	Description	Examples
1 - Rare	Highly unlikely	Probably never will occur
2 - Unlikely	Slight possibility	Not expected but possible
3 - Possible	Might occur occasionally	History of casual occurrence
4 - Likely	Strong possibility	Frequent occurrence history
5 - Almost Certain	Expected in most circumstances	Regular occurrence history

Overall Risk Rating = Likelihood x Consequence

Score Range	Risk Level	Colour Code
1 - 8	Low	Green
9 - 15	Medium	Amber
16 - 25	High	Red

Appendix 4: Shared Risk Approach Protocol and Pro Forma

Purpose

To manage high or complex risks collaboratively across all stakeholders, ensuring shared understanding, joint decision-making, and coordinated action.

Key Features

- Involves internal staff (therapists, special advisors), external agencies, families, carers, and the pupil where appropriate.
- Decisions and actions are documented and reviewed regularly (typically fortnightly or more frequently).
- Supports immediate and ongoing management of high/complex risks; not designed as a permanent measure.

Pro Forma Sections

Section	Details to Include
Person completing form	Name and role
Keys Group staff involved	Names and roles
Professionals involved	Agency, name, role
Others involved	Family, carers, pupil (if appropriate)
Date decision made	Date of meeting
Date for next review	Planned review date
Risk decision summary	Pupil name, risk details, risk scores, protective factors, what is working well, key indicators of risk reduction
Risk management actions	Actions, responsible person/agency, deadlines
Agreement and escalation	Agreement status, disagreements, subsequent actions, escalation plans
Communication plan	How to inform other agencies not directly involved
Date of next meeting	Scheduled date

Appendix 5: Staff Competency Workbook Overview

Purpose

Supports staff in developing competence in risk assessment and management as part of delivering high-quality education and safeguarding.

Contents

1. Risk assessment and management policy and procedure overview
2. Glossary of terms
3. Relevant legislation and statutory requirements
4. Regulator expectations on risk assessment
5. Introducing contextual safeguarding beyond school environments
6. Writing clear, effective risk assessments
7. Practical exercises applying learning
8. Reflecting on learning and embedding practice
9. Completion sign-off by staff and line managers
10. Appendices (guidance and reporting standards)

Process

- Staff complete workbook alongside structured supervision and annual appraisal.
- Competency sign-off recorded on training matrix and personnel files.
- Ongoing refresher training and updates provided by Learning and Development.

Appendix 6: Handy One-Minute Guide

1) What this is (60-second read)

This guide tells you what to do—today—to keep pupils safe and compliant with policy. Use it alongside the full policy and the Individual Risk Assessment (IRAM) template.

2) Your must-do's every day

✓ Read and sign the current IRAM for every pupil you work with.

✓ Follow the controls exactly as written—structured as **Before / During / After**.

✓ Record incidents promptly (same day where possible) and debrief; suggest updates.

✓ Escalate high/complex risks → request a **Shared Risk** meeting within **5 working days**.

✓ Involve the pupil; note how their voice shaped the plan.

✓ Share IRAMs on a **need-to-know** basis; store securely (special-category data).

3) The 5-step cycle (think I-A-C-I-M)

1. **Identify** – history, triggers, indicators, context.
2. **Assess** – score *inherent* risk (likelihood × consequence) before controls.
3. **Control** – specific measures **Before / During / After** (who/what/where/when).
4. **Implement** – brief the team; consistency is non-negotiable.
5. **Monitor & Review** – re-score *residual* risk each term or after incidents.

4) When to create or update an IRAM

• Admission/transition or return from suspension/exclusion.
• Any significant incident (harm, absconding, police involvement, use of reasonable force).
• Emerging patterns (repeated bullying, self-harm indicators, escalating dysregulation).
• Change in needs (new diagnosis, medication, EHCP update, family context).
• Staff request where day-to-day practice indicates unmanaged risk.

5) Key Changes from Previous Policy

- Incorporation of Section 93A (2025): Schools must now record and notify parents of all significant uses of force.
- Clearer terminology: 'Post-incident support' and 'reflective review' replace outdated 'debrief' terms.
- Explicit use of RADAR: All interventions must be recorded within 24 hours.
- Parent notification: Duty to inform each parent as soon as reasonably practicable unless it risks harm.
- New KCSIE 2025 expectations: Leadership oversight, governor training, DSL escalation and equality considerations.
- Integration of Keys Group's SUPPORT and SHARE frameworks for post-incident reflection and pupil voice.
- Staff and pupil well-being prioritised with clearer processes for body mapping, medical checks, and recovery.

6) What Staff Need to Know

- All staff must be familiar with the policy and know how to respond to behaviours of concern using de-escalation first.
- Physical intervention is a last resort. When used, it must be necessary, proportionate, and in the pupil's best interests.
- Every incident must be recorded in RADAR and reviewed by a senior leader within 24 hours.
- You must complete a post-incident reflection using the SHARE framework and support pupils using the SUPPORT model.
- Parents must be informed of every significant incident unless it could place the child at risk.
- DSL must be informed of all significant use of force for safeguarding oversight.
- Governors receive trend data and oversight reports termly, and must be trained on their responsibilities.

Appendix 7: Invacuation Procedure Template

Purpose

To provide clear, site-specific guidance on the invacuation procedure to safeguard pupils, staff, and visitors during external threats or emergencies requiring occupants to remain inside the building.

Scope

This procedure applies to all staff, pupils, and visitors at Liverpool Progressive School.

Triggers for Invacuation

- Security threat or intruder on or near the premises
- Severe weather conditions (e.g., tornado, severe storm)
- Environmental hazards (e.g., chemical spill nearby)
- Police or emergency services advice

Roles and Responsibilities

Role	Responsibility	Contact Details
Headteacher / Site Leader	Initiate invacuation, coordinate communication, liaise with emergency services	Anthony Saleh Anthony.saleh@keyseducation.ac.uk Mike Smyth (site manager) Mike.smyth@keys-group.co.uk
Deputy Head / Senior Leader	Support implementation, oversee pupil safety, conduct roll call	Michael Hussey Michael.hussey@keyseducation.ac.uk
All Staff	Follow invacuation instructions, support pupils, ensure accountability	N/A
Support Staff	Assist pupils with additional needs to reach safe areas	N/A

Invacuation Steps

1. **Alert:** The Headteacher or designated person activates the invacuation alarm or communicates the need to invacuate via internal communication systems.

2. **Secure:** Lock all external doors and windows immediately.
3. **Assemble:** Pupils and staff move calmly to designated safe areas (see below).
4. **Account:** Staff conduct roll call to confirm all pupils and personnel are present.
5. **Remain:** Stay in safe areas until the all-clear is given by the Headteacher or emergency services.
6. **Communicate:** Maintain communication with emergency services and provide updates to staff and parents as appropriate.

Designated Safe Areas

Elm dining room/Kitchen

Beech Area

Oak Area

Willow Area

Acorn Area.

All these areas provide shelter and protection and are accessible to all students and staff.

- These areas are away from external windows and doors
- They provide shelter and protection
- They are accessible to pupils with disabilities

Communication Plan

- Internal communication via internal 'phone system/school mobiles.
- Emergency services contact: Dial 999
- Parent notification protocols: Message on Arbor/direct calls from school phones.

Training and Drills

- Invacuation drills will be conducted termly at LPS
- Staff training on invacuation procedures is part of induction and ongoing professional development.

Review and Update

- This procedure will be reviewed annually or following any incident requiring activation.
- Feedback from drills and incidents will inform updates to improve effectiveness.