St Paul's School
FOUNDED 1509

Risk Assessment Policy

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Applicable to:	SPS & SPJ		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to policyquery@stpaulsschool.org.uk

1. Aims and Objectives

The School aims to ensure that:
- Pupils,' staff and visitors' health, safety and wellbeing are adequately protected;
- All staff are aware of, and adhere to, the School's policies and procedures on pupil health, safety and welfare;
- All risks that may cause injury or harm to pupils, staff and visitors are identified;
- Control measures are implemented to manage risks so far as is reasonably practicable with a view of promoting the health, safety and welfare of all in our school community;
- To ensure that suitable and sufficient risk assessments are conducted, recorded and reviewed for activities where risk has been identified;
- Ensure that key staff have clearly established roles and responsibilities and that all staff are appropriately trained to deal with all health, safety and pupil welfare issues.

2. Legislation and statutory requirements

This policy is based on the following legislation and guidance:
- Part 3 of The Department for Education's Independent School Standards Regulations 2014 which requires proprietors to have a written risk assessment policy. (DfE Guidance 2019)

- Regulations 3 and 16 of [The Management of Health and Safety at Work Regulations 1999](#) require employers to assess risks to the health and safety of their employees, including new and expectant mothers.
- Regulation 4 of [The Control of Asbestos Regulations 2012](#) requires that employers carry out an asbestos risk assessment.
- Employers must assess the risk to workers from substances hazardous to health under regulation 6 of [The Control of Substances Hazardous to Health Regulations 2002](#) (as amended).
- Under regulation 2 of [The Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)](#), employers must assess the health and safety risks that display screen equipment pose to staff.
- Regulation 9 of [The Regulatory Reform (Fire Safety) Order 2005 (as amended)](#) says that fire risks must be assessed.
- Regulation 4 of [The Manual Handling Operations Regulations 1992 (as amended)](#) requires employers to conduct a risk assessment for manual handling operations.
- The [Work at Height Regulations 2005 (as amended)](#) say that employers must conduct a risk assessment to help them identify the measures needed to ensure that work at height is carried out safely.
- [DfE guidance on first aid in schools](#) says schools must carry out a first aid needs risk assessment to determine what first aid provision is needed.
- [DfE guidance on the Prevent duty](#) states that schools are expected to assess the risk of pupils being drawn into terrorism.
- [DfE Keeping Children Safe in Education (Sept 2025)](#) and [Working Together to Safeguard Children 2023](#)
- The Health and Safety Executive (HSE) say schools which manage their own pools must conduct a risk assessment.
- [The National Minimum Standards for Boarding Schools (NMS, 2022)](#) states that the safety and welfare of boarders, potentially harmful activities and sleeping accommodation should be adequately risk assessed.
- [The Terrorism (Protection of Premises) Act 2025](#) requires persons with control of certain premises or events to take steps to reduce the vulnerability of the premises or event to, and the risk of physical harm to individuals arising from, acts of terrorism.

3.   Definitions

Risk assessment	A tool for examining the hazards linked to a particular activity or situation, and establishing whether sufficient precautions have been taken in order to prevent harm from them based on their likelihood and their potential to cause harm.
Hazard	Something with the potential to cause harm to people

Risk	The chance that people could be harmed by hazards, together with an indication of how serious the harm could be.
Control measure	Action taken to prevent people being harmed.

4. Roles and Responsibilities

4.1 The Governing Body

The ultimate responsibility for safeguarding, pupil welfare and health and safety rests with the Governing Body, as the employer. It has delegated the day-to-day running of the School, including the management of safeguarding, pupil welfare and health and safety, to the High Master. As the employer they have a duty to:

- Assess the risks to staff and others affected by school activities in order to identify and introduce the health and safety measures necessary to manage the risks.
- Inform employees about risks and the measures in place to manage them.

4.2 The High Master

The Governing Body has delegated the day-to-day running of the School, including the management of safeguarding, pupil welfare and health and safety, to the High Master. It is their responsibility to ensure that all risk assessments are completed and reviewed.

The High Master will:

- Keep the Governors informed about the implementation of this Risk Assessment Policy.
- Ensure that pupils' health, safety and wellbeing are adequately protected.
- Ensure that key staff have clearly established roles and responsibilities.
- Ensure that where concerns about a pupil's welfare are identified, the risks are appropriately managed.
- Ensure that standards of pupil welfare at the School are regularly monitored both at an individual level and across the whole school community to identify trends and issues of concern and to improve systems to manage these.

4.3 Executive Staff

Responsibility for oversight of risk assessments across both schools has been delegated to Senior Staff across both schools:

Area of responsibility	St Paul's School (SPS) Responsibility for Risk Assessments	St Paul's Juniors (SPJ) Responsibility for Risk Assessments
Safeguarding / Child Protection	SPS Designated Safeguarding Lead	SPJ Designated Safeguarding Lead
Protection from Radicalisation and Extremism	Assistant Head (Safeguarding & Pupil Wellbeing)	SPJ Designated Safeguarding Lead
Employment of Staff/Recruitment	Director of HR	Director of HR
Anti-bullying	Deputy Head Pastoral & Head of Boarding	r Deputy Head Pastoral
Behaviour	Deputy Head Pastoral & Head of Boarding	Deputy Head Pastoral
Health and Safety, Security, Fire	Director of Operations	Director of Operations
First Aid	Head Nurse	Head Nurse
Administration of medicines / Supporting pupils at school with medical conditions	Head Nurse / SPS Head of Learning Support	Head Nurse / SPJ Head of Learning Support
Supervision of Pupils	Deputy Head Pastoral	Deputy Head Pastoral
Educational Trips	SPS Educational Visits Coordinator (EVC)	SPJ Assistant Head
Boarding House	Deputy Head Pastoral/ Head of Boarding	N/A

More Information on these areas of responsibility and how they are managed can be found in Appendix 3.

4.4 All other School Staff and Volunteers should:

- Recognise that risk assessment is a constant, systematic and occasionally dynamic process necessary to promote children's welfare.
- Assist with, and participate in, risk assessment processes as required
- Familiarise themselves with risk assessments which involve any activities that they undertake
- Implement control measures identified in risk assessments
- Alert the appropriate Executive Staff member to any risks they find which need assessing

4.5 Pupils and parents:

Pupils and parents are responsible for following the school's advice in relation to risks, on-site and off-site, and for reporting any hazards to a member of staff.

4.6 Contractors

Contractors will be required to provide evidence that they have adequately risk assessed all of their planned work.

5.   Key risk areas

The School's Health and Safety Policy has considered a number of key areas the School will specifically consider from a risk to safety perspective (see Appendix 1). A more detailed range of areas which may require risk assessment (non-exhaustive) are set out in Appendix 2.

6.   Risk Assessment Procedure

6.1 When to Complete a Risk Assessment

Risk Assessments should be completed whenever potential hazards are identified linked to a particular activity or situation when it is deemed that measures or precautions are required to prevent harm.

The need for a Risk Assessment to be undertaken or reviewed will arise when:
- Required by legislation, or changes to legislation, statutory guidance or other regulatory requirements
- Identified as part of the annual audit or review and/or in Health & Safety, Safeguarding or other committees
- New activities or events are planned, or changed
- Changes to people involved in activities
- Changes in good practice
- Changes to on-site facilities, buildings or to the local environment, or as otherwise advised by H&S consultants, the Police or the local authority

- In response to a perceived change in circumstances or in light of new information which indicates a substantive increase in risk in any given situation that involves or otherwise affects pupils, staff, or the School community at large.
- After a near miss or accident

Most in-school activities such as sport are already covered by the departmental policies and risk assessments held by the School. Members of staff should ensure that they are familiar with these and apply the advice contained in them in order to minimise risk. Those overseeing activities have a responsibility to ensure any colleagues and pupils understand the risks involved in the activity and any delegated responsibility for managing risks or keeping themselves or others safe.

There might also be a situation where a member of staff requires a risk assessment — for example during pregnancy or on their return after a particular illness or injury. Specialist advice will be sought in these situations.

It is not a requirement that risk assessments are in writing, but significant findings of risk assessment, including those set out in appendix 1 and 2, should be in writing.

6.2 How to complete a Risk Assessment

When assessing risks the person completing the risk assessment should follow these steps:

Identify the hazard; what could go wrong? - we will consider activities, processes and substances within the school and establish what associated-hazards could injure or harm the health of staff, pupils and visitors.

Decide who may be harmed and how – for each hazard, we will establish who might be harmed. We will bear in mind that some people will have special requirements, for instance pupils with special educational needs (SEN) and expectant mothers. We will then establish how these groups might be harmed.

Evaluate the risks and decide on the precautions/measures; consider how likely is it to go wrong and how serious would it be if it did. Decide on the precautions/ control measures (reviewing existing ones as well) that are appropriate to remove/reduce the risk of harm.

Record significant findings – the findings from the steps above should be written up and recorded in order to produce the risk assessment.

Review the assessment and update, as needed – see when to complete a risk assessment above. Departmental risk assessments are reviewed annually as a matter of course.

Retain the risk assessment – risk assessments are retained for three years after the length of time they apply. Risk assessments are securely disposed of.

When completing a risk assessment we will:

• Balance the level of risk against the measures needed to control them and do everything that is reasonably practicable to protect people from harm.

• Involve pupils and/or staff, where appropriate, to ensure that all possible hazards have been identified and to discuss control measures, following a risk assessment.

The priority is to complete a risk assessment following the steps above regardless of the pro forma used, but a simple risk assessment template can be found on the School Intranet here.

7. Training

Training is available as appropriate to need and at the required frequency, to all relevant employees. Some employees may be required to undertake compulsory training when considered appropriate by Senior Management or specialist consultants. Employees are encouraged to seek support from the Executive Staff named in section 4 in the first instance should they feel they require it.

8. Related policies

This Risk Assessment Policy should be read in conjunction with the following policies:
● Health and Safety Policy
● Fire Safety Policy and Procedures
● First Aid Policy
● Educational Visits Policy and Procedures
● Driving for Work Policy
● Safeguarding and Child Protection Policy and Procedures
● Supervision of Pupils Policies - SPS and SPJ
● Recruitment Documents and Policies including: Safer Recruitment, Visiting Speaker Policy, Safeguarding checks for Contractors and Volunteers
● Host families - vetting checks policy
● Maternity Policy
● Disability Policy
● Boarding Policies, including:
  ○ Boarding Houses (Supervision of Boarders) Risk Assessment
  ○ Boarding Houses Risk Assessment
● Security, Access Control and Lone Working Policy
● Critical Incident Plan
● Policy on Staff commencing employment pending DBS disclosure

9. Monitoring and Review

Relevant risk assessments and any action taken in response to risk assessments will be monitored regularly by the High Master at St Paul's School and the Head at St Paul's Juniors or by a nominated senior member of their staff.

This policy and related School procedures will be reviewed annually by the High Master at St Paul's School and the Head at St Paul's Juniors or by a nominated senior member of their staff, and updated as necessary. In undertaking the monitoring and review of relevant risk assessments and

this policy (as necessary), the School will seek to identify trends and understand issues of concern and to take steps to improve systems to manage these.

Appendix 1:   Key Risk Areas

As set out in the School's Health and Safety policy, the school considers the risk to safety involved in:

- Physical, chemical and biological hazards, such as machinery safety, chemical safety, asbestos in school buildings, water quality (legionella risk assessments), and the use of radioactive material (COSHH);
- Contractors in schools and any construction site;
- Vehicle movements within the school grounds;
- Workplace safety arrangements;
- School trips (Educational Visits);
- Work experience arrangements;
- Violence to staff;
- School security (including fencing, electric gates and use of CCTV) ;
- Maintenance of plant and equipment; (Register held by Head of Estates of all certification and testing)
- Manual Handling and Working at heights;
- Management of Asbestos; (All asbestos has been removed or encapsulated in accordance with the UKAS Inspection Regulations)
- Fire risk assessments and procedures;
- Occupational Health services and managing work related stress;
- Letting of school premises to outside bodies; (All lettings provided with written Fire and Health & Safety brief and risk assessments carried out for major events)
- Slip, trips and fall hazards;
- First Aid;
- Playgrounds, external areas and ball-courts;
- Facilities Management of common areas (corridors/stairs);
- Infection control;
- Partnerships activities.

Appendix 2:   Areas/activities which may require risk assessment (non-exhaustive)

Educational

The educational departments in both schools complete classroom risk assessments at least on an annual basis. In addition to this the School would consider risk assessing the following:

- Higher risk science experiments
- Art exhibitions/experiments/kiln use
- Design and Technology/Engineering projects
- Sport and PE activity; swimming and any new sports and games which pupils are involved in
- Duke of Edinburgh
- Drama and use of Theatre for productions
- Off-site risk assessments such as for:
  o   Educational visits and trips
  o   Social events
  o   Away sports fixtures
- Extra-curricular clubs
- New programmes that are introduced
- Voluntary services

Support

- Catering – food, hygiene, safety and pupil welfare (eating disorders, allergies/intolerances etc.)
- Use of equipment etc. Cleaning -cleaning products; spills and body fluids
- Estates/Maintenance – Contractor safety (permit to work/hot works/inductions); site security; boundaries; equipment; chemicals; working at height; trips/falls
- Vehicle movement and pedestrians on site
- Animals brought onto site
- Fire and Emergencies
- On site event risk assessments – which could be educational or support functions.

Staff and Pupil Safeguarding and Welfare

- Boarding (including supervision, high activities, sleeping accommodation, fire risk, staffing cover and other Safeguarding risks present)
- Visitors on site
- Site Security
- PREVENT
- Risks from child-on-child abuse such as bullying, sexting, etc.
- Safer Recruitment – management of vetting checks including permanent, temporary, full-time and part-time staff, governors, contractors and volunteers, etc.
- Pupil welfare: medical needs, supervision, First Aid.
- Events involving the provision of alcohol
- Staff pregnancy, DSE, return to work following illness, workstation ergonomics, disabilities or adjustments.

Appendix 3

Safeguarding / Child Protection

- With regard to safeguarding risks, and in accordance with current statutory guidance, including *Keeping children safe in education* (Sept 2025) and *Working together to safeguard children* (December 2023) and Part 3 of the ISSRs and the NMS, the School has systems in place to identify pupils who may be in need of extra help, or those who are suffering, or are likely to suffer significant harm, and will take appropriate action to address and mitigate those risks by working in conjunction with social care, the Police, health services and other services, where appropriate or necessary. And in terms of those identified as being at risk of radicalisation and being drawn into terrorism, Channel and PMAP programme partners.
- Full details of the School's Safeguarding Procedures are set out in the Child Protection and Safeguarding Policy.
- The School has a separate policy on staff commencing employment pending a DBS check.

Protection from Radicalisation and Extremism

- Details of the School's procedures to prevent pupils from becoming radicalised and/or being drawn into extremism and/or terrorism in accordance with the guidance in *Prevent Duty Guidance: England and Wales* (2023*)* are also contained within the Child Protection and Safeguarding Policy.
- The School will meet these obligations by assessing the risk of pupils being drawn into radicalisation and/or extremism and/or terrorism and putting in place control measures to support those at risk.
- However, the School balances this duty against the fact that Schools should be safe spaces in which children and young people 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.
- The School will ensure that the arrangements for visiting speakers, whether invited by staff, pupils or parents, are suitably risk assessed before the visit takes place and that clear protocols are in place to ensure that those visiting speakers are suitable and are appropriately supervised when on School premises.

Supervision

- Both Schools have a written Supervision of Pupils Policy which ensure appropriate and safe supervision of pupils in and out of School hours.

Anti-bullying

- Both Schools have a written Anti-bullying Policy which cover the School's approach to the management of bullying and cyber-bullying.

Behaviour

- The School has written Behaviour, Rewards and Sanctions Policies for each of SPS and SPJ which set out how the School promotes good behaviour amongst pupils and the sanctions to be adopted in the event of pupil misbehaviour.
- These policies contain further information about the School's performance of its duties under the Equality Act 2010 (and reasonable adjustments made for pupils with disabilities), support systems for pupils and liaison between parents and other agencies.

Health and Safety

- In accordance with its obligations under the Health and Safety at Work Act 1974 and with Part 3 of the ISSRs and the NMS, the School has a duty to ensure the health, safety and welfare of employees and the health and safety of pupils and others affected by the School's operations, so far as is reasonably practicable.
- The Management of Health and Safety at Work Regulations require a broad risk assessment of the work and activities of the School. The School will assess all reasonably foreseeable risks and others which are identified by specific Health and Safety regulations. The safety policy documentation, together with the School's documented regular inspection and assessment regimes, form the basis of the broad risk assessment used to ensure that a suitable and sufficient check of areas or tasks is carried out to identify any hazards which might exist there.
- The School will meet this requirement by taking a sensible, proportionate and holistic approach to management of health and safety issues in accordance with the School's obligations and its Health and Safety Policy.

Educational Visits

- The Educational Visits Coordinators (EVC) for both Schools manage off-site School risk assessments where pupils will be conducting activities off site and these are controlled in line with the Educational Visits Policy. Off-site risk assessments are sometimes more difficult to complete as we have less control over areas which we do not own and also may have to rely on the health and safety arrangements of other organisations, such as hotels, centres or other educational sites. We use high quality providers of services, centres and activities, using licensed Adventure Activities Licensing Regulations sites for instance, wherever possible, to ensure that we can be assured of a high level of care and health and safety awareness. Wherever possible, the school will ensure that they have copies of activity provider risk assessments and details of the Public Liability Insurance.

- For trips abroad, the school aims to use specialist trip providers to ensure that the activities, services and venues being used have been checked by them and that they in turn can assure us of their suitability, quality and safety. Where Host families are used, a separate School policy, Host families - vetting check policy, is available.

- It should be noted that although risk assessments, whether generic or specific, may be completed in advance of the activity, there may be occasions when these risk assessments are found to be lacking due to unforeseen factors. In this case, dynamic risk assessment on site can be used to reduce the risks.

First Aid

- The School has a First Aid Policy and a Management of Medications Policy which contain the appropriate steps that should be taken when managing and overseeing injuries or the administration of medications.

Boarding

- The School has a suite of Boarding Policies which are followed by Boarding House Staff to manage the safety, health and welfare of all boarders.