Risk Management and Risk Assessment Policy

1.   Purpose and scope of the policy

1.1.   This policy sets out the School's approach to risk management and risk assessment and fulfils the statutory requirement under Part 3 of the *Education (Independent School Standards) Regulations 2014* noting there are additional policies and documents required for compliance (NMS 13.7) for Boarding Schools. (Part 3, paragraph 16) that governors must ensure arrangements are in place to safeguard and promote the welfare of pupils through a written risk assessment policy and its effective implementation.

1.2.   Pupil welfare is central to all School activities; all staff are responsible for safeguarding pupils and keeping children safe in education, and effective risk management is crucial in enabling this.

2.   Policy ownership

2.1.   The owner of this policy is the Deputy Master, who is responsible for ensuring that this policy is implemented and is reviewed annually. The policy is also reviewed and approved by the Executive Leadership Team (ELT).

3.   Related policies and key documents

3.1.   This policy sits alongside and complements specific risk assessment policies (such as Health and Safety Risk Assessment Policy, Fire Safety Policy, and Educational Visits Policy), ensuring that all forms of risk assessment are part of a coherent and consistent framework. This policy should also be read in conjunction with the following:

- Safeguarding and Child Protection Policy
- Health and Safety Policy
- Supervision of Pupils Policy
- Attendance Policy
- Missing Pupils Policy
- ICT Acceptable Use Policy
- Countering Bullying Policy
- Critical Incident Policy
- Data Protection Policy
- First Aid Policy
- Head Injuries and Concussion Policy
- Provision of Medical Care Policy
- Self-harm and Suicide Prevention Policy
- Taking, Storing and Using Images of Children Policy
- Visitors, Contractors and Site Security Policy

4.   Legal and regulatory framework

4.1.   This policy has been drawn up and implemented with due regard to:

- Education (Independent School Standards) Regulations 2014 (Part 3 and Part 8)
- Keeping Children Safe in Education (KCSIE, September 2025)
- Working Together to Safeguard Children (2023)
- National Minimum Standards for Boarding Schools (2022)
- Health and Safety at Work etc. Act 1974
- Children Act 1989 and 2004
- UK GDPR and Data Protection Act 2018

5.   Definitions

5.1.   **Risk:** anything which threatens the delivery of Haileybury's Strategic Development Plan, the safety of its community, or the welfare and wellbeing of its pupils. In the context of pupil wellbeing, the *Children Act 2004*, identifies wellbeing as encompassing:

- physical and mental health and emotional wellbeing.
- protection from abuse and neglect.
- education, training and recreation.
- domestic, family and personal relationships.
- contribution made to society.
- securing rights and entitlements.
- social and economic wellbeing.
- suitability of living accommodation.
- physical, intellectual, emotional, social and behavioural development.

5.2.   **Issue:** a risk which has materialised.

5.3.   **Emerging risk**: a risk resulting from a source newly identified for which available knowledge is weak or evolving.

5.4.   **Inherent Risk:** the impact and probability of a risk materialising without the implementation of any controls.

5.5.   **Residual Risk**: the impact and probability of a risk materialising following the implementation of controls.

5.6.   **Risk Assessment:** A written record of identified risks/ hazards

5.7.   **Risk Register:** a log of the identified risks, their associated impacts and probabilities and any controls that are in place to manage them.

6.   Roles and responsibilities

Role/ Stakeholder	Responsibilities
Council *(All risks)*	Maintain oversight of risk management, ensuring that an appropriate risk management framework is in place.
	Seek evidence and assurance that risk management practices are effective and documented.
	Determine the level of risk that the School is willing to accept in the delivery of the Strategic Development Plan.
Executive Leadership Team (ELT) *(All risks)*	Ownership of the Risk Register: - review, challenge and approval of risks and their associated risk assessments.
	Integrate risk management into strategy and operations by ensuring that risk management is part of informed decision making, planning and reporting.
	Reporting and escalation to Council.

Risk Committee	Maintain and update the risk register, ensuring that it is accurate, comprehensive, consistent and regularly reviewed.
	Facilitating discussions on emerging risks.
	Co-ordinate the input from risk owners and Leadership Teams.
	Monitor actions plans.
	Provide assurance to the Executive Leadership Team and onwards that risk controls are effective.
Leadership Teams (*Risk relevant to their area*)	Actively identify new or emerging risks. (Consider issues, trends, near misses, and horizon scanning).
	Review existing risks relevant to their area to ensure that: - they comprehensively reflect the hazards faced, - their likelihood and impact have been accurately assessed, - mitigations are appropriate, effective and proportionate, - they are effectively monitored. Any changes to be reported to the Risk Owner.
	Onwards reporting/ escalation to the Risk Committee and ELT where appropriate.
Risk Owners	Take ownership of individual risks as recorded on the risk register: - articulate the risk in a risk assessment - document the controls and mitigations in place - assess the likelihood and impact pre and post mitigation - detail proposed actions.
	Ensure that controls and mitigations are applied and working effectively.
	Collaborate with colleagues where the risk is cross-functional.
All staff (First line of defence)	Apply policies and procedures correctly in daily work.
	Identify and report issues, incidents, near misses and new risks to line managers.
	Take responsibility for managing risks in their area.

7.   Written Risk Assessments

7.1.   The School will retain a written record of risks, encompassing risk identification, assessment, management and monitoring. (The risk management cycle is detailed in Section 8 below).

7.2.   The type of written assessment undertaken is determined by the specific nature and context of the risk. High-level risks are recorded in the School's Risk Register (see Appendix 1), while task- or activity-specific risks are captured in the appropriate operational systems. For example, risks relating to the physical environment may require a health and safety assessment, while those concerning fire hazards will be addressed through a fire safety assessment. Activities such as educational trips and visits, require dedicated risk assessments to ensure that appropriate supervision, planning, and emergency arrangements are in place. In situations where there are concerns about an individual pupil's welfare, a personalised Safety Support Plan (see Appendix 2) may be developed to manage risks specific to that pupil.

7.3.   Regardless of the form used, each assessment contributes to the overarching safeguarding response and the promotion of pupil wellbeing.

8.   Risk Management Cycle

8.1.   Risk management is a continuous process to systematically identify, evaluate, and address risks:

8.2.   Risk Identification: This is the process of recognising and documenting hazards or potential threats to the delivery of Haileybury's Strategic Development Plan, the safety of its community, and the welfare and wellbeing of its pupils.

8.3.   It is acknowledged that risks may arise from a range of sources including operational, financial, and strategic areas. In recognition of its paramount importance, Safeguarding Risk is identified as a distinct category. Other categories recorded in the School's Risk Register include Compliance, Legal and Regulatory Risks, Governance Risks, Health and Safety Risks, and External Risks.

8.4.   The School recognises that risk identification is a shared responsibility. All staff should be alert to potential risks in their area and, where appropriate, report them to their line managers. Leadership Teams have a responsibility to ensure that entries in the Risk Register are clearly articulated and comprehensive, and that emerging risks are consistently recognised, escalated where appropriate, and addressed.

8.5.   Risk Assessment: For risks documented in the Risk Register, assessments are articulated as risk scores that consider probability: the likelihood of an event occurring; and impact, including financial, reputational, regulatory, legal, and operational impacts, as well as the potential for unintended consequences such as the denial of opportunity, for pupils who do not benefit from the particular aspect of provision. Assessments will be made both pre (inherent risk scores) and post the application of mitigating measures (residual risk scores).

8.6.   When assessing risks to pupil welfare and well-being at the School, staff should also consider whether the matter should be reported internally and / or to external agencies and /or regulatory bodies. The procedures for reporting safeguarding concerns are set out in the School's Safeguarding and Child Protection Policy.

8.7.   Risk Management/ Response: Once risks have been identified and assessed, appropriate responses are developed to manage them effectively. This may involve taking action to mitigate the likelihood of the risk occurring, reducing its potential impact, transferring the risk to another party (for example through insurance), or, where appropriate, accepting the risk in a controlled and informed way. The response will be proportionate, practical, and aligned with Haileybury's duty to safeguard pupils.

8.8.   Risk Monitoring: Identified risks are regularly monitored and reviewed to ensure they remain current and relevant. For risks documented in the Risk Register, Risk Owners will

review their risk assessments on a termly basis before submitting them for discussion and endorsement by the Risk Committee. The updated risk register will be presented to the ELT for final approval.

8.9.   In addition to the scheduled termly reviews, risk assessments are also revisited in response to the materialisation of risks as issues or incidents, as well as in response to significant changes in circumstances, such as new legislation, changes to provision, or emerging safeguarding concerns.

8.10.   A standing "risk" agenda item is included in Leadership Team meetings, with the output being shared with relevant risk owners. This provides a structured forum for members to:

- report issues, incidents, near misses, emerging trends, or concerns,
- identify potential new or emerging risks,
- consider whether additional mitigations are required, and
- assess whether the matter is already appropriately captured in existing risk assessments or, whether the description
- and/ or scoring should be amended for greater clarity and transparency.

8.11.   This approach also ensures that outputs are systematically reported to the relevant risk owner and factored into the next risk review. This approach not only promotes greater transparency but also increases awareness of the contents of the risk register, enabling more staff to understand and engage with the School's key risks.

9.   Oversight

9.1.   Risks are reviewed by the relevant Council sub-committee on a termly basis, and the whole risk register is reviewed on a termly basis by the Nominations and Governance Committee. The Risk Register is reviewed in its entirety by the full Council on an annual basis in the Summer Term.

Version history		
Date	Reviewed by	Notes
September 2025	Deputy Master/ Deputy Head (Pastoral)	New policy drafted and reviewed
September 2025	ELT	Reviewed and approved

Appendix 1 - Risk Register

The Risk Register sets out an assessment of potential hazards for high-level business risks, the probability (likelihood) of them occurring and their potential impact. For each item on the Risk Register, a Risk Assessment (see example below) is in place that sets out the detailed steps taken to mitigate against that particular risk, and any further steps or action to be taken. These Risk Assessments can be accessed via a hyperlink from the Register itself.

The Risk Register is a working document, updated termly to reflect the changing nature of the School and any threats.

The Risk Register is shared and discussed with the Executive Leadership Team and its sub-committees. It is a standing item on the agenda for the Governors' Nominations and Governance Committee. The Governor committees also review individual risks that affect their area of governance at their termly meetings. The Register is presented to Council annually in June for review.

The following matrix is used to classify potential hazards:

		Impact				
		1 Very Low	2 Low	3 Moderate	4 High	5 Very High
Probability	1 Very Low	1	2	3	4	5
	2 Low	2	4	6	8	10
	3 Moderate	3	6	9	12	15
	4 High	4	8	12	16	20
	5 Very High	5	10	15	20	25

Probability Key: Scores are attributed for probability based on the following:

1. Extremely unlikely
2. Unlikely but possible
3. Chances of happening broadly equal to not happening
4. Event is more likely to happen than not happen

5.   Event is expected to occur

Impact Key: Scores are attributed for impact based on the following:

Impact Score	Consequences for individuals	Financial Exposure (including direct financial loss, legal costs, fines, property damage)	Impact on the School's Strategic Goals
5	Life-changing injury or death	+ £5m	Strategic goal unattainable
4	Serious harm or non-critical injury	+ £1m	Strategic goal difficult to attain
3	Harm to individual or significant effect on aspect of pupil experience	+ £500k	Strategic goal delayed
2	Low-level harm or injury but to more than one individual	+ £100k	Strategic goal affected
1	Affects the general pupil experience	Up to £100k	Strategic goal somewhat affected

Risk Register Codes

Ref	Reference number
Hazard	Short description of the hazard to be used on the Risk Assessment
IP	Inherent probability of the hazard occurring without mitigation
II	Inherent impact of the hazard before mitigation
IR	Inherent risk of the hazard before mitigation
Mitigation	Brief description of the mitigating factors
RP	Residual probability of the hazard occurring after mitigation
RI	Residual impact of the hazard after mitigation
RR	Residual risk to the School of the hazard at the date of risk assessmentRisk

Risk Assessment - <mark>Safeguarding risks</mark>

Ref	<mark>1.1</mark>	Risk	
Description of Hazard			
Effects on School and Community			

Inherent Risk	Score	Comment
Probability of occurring		
Impact		
Risk Score		

Mitigation in Place	

Residual Risk	Score	Comment
Probability of occurring		
Impact		
Risk Score		

Action Plan				
Is further action required?	Yes	Comment	No	Comment

Further Actions			
	Action	Who	When

Appendix 2 - Safety Support Plan

Where concerns are raised about an individual pupil's welfare, a personalised Safety Support Plan (SSP) may be developed. The purpose of an SSP is to identify risks particular to that pupil and to set out agreed strategies for managing and reducing those risks in a way that prioritises the pupil's wellbeing and safety.

Content of the plan
Each Safety Support Plan should include a clear summary of the concern, who may be affected and how, the measures already in place, and any additional action required to support the pupil. Responsibilities and timescales should be specified so that all relevant individuals understand their role in managing the identified risks.

Responsibility for writing
The responsibility for drafting an SSP will ordinarily rest with the pupil's House Master (HM) in conjunction with the Designated Safeguarding Lead (DSL). In some cases, depending on the nature of the concern, other professionals may take the lead in writing the plan, such as a member of the Health and Wellbeing Centre team. Plans are often written collaboratively, involving key adults who know the pupil well, and, where appropriate, parents and external agencies may contribute to ensure that the plan is comprehensive and practical.

Storage and access
All SSPs are stored securely on the school's safeguarding management system (CPOMS). This ensures that records are confidential but accessible to all staff who are directly involved in the care, supervision, or support of the pupil. In this way, staff are informed of the agreed strategies and can act consistently to support the pupil's welfare. Access is restricted to those with a legitimate role in safeguarding and supporting the pupil.

Sharing and confidentiality
An SSP will be shared only with those who need to know the content in order to carry out their safeguarding or pastoral responsibilities effectively. This may include teachers, House staff, Health and Wellbeing Centre staff, and, where relevant, external professionals. Parents will be involved as appropriate, depending on the context and the confidentiality requirements of the case. The level of information shared is determined by the DSL, balancing the need for safeguarding oversight with respect for the pupil's privacy.

Review and amendment
The review cycle for SSPs is determined by the content and context of the plan. Some plans may require frequent review and amendment, for example where risks are changing rapidly, while others may remain in place for longer periods with only minor updates. Reviews will be carried out jointly by the DSL, HM, and other relevant staff, ensuring that the plan continues to reflect the pupil's needs and the effectiveness of the agreed strategies. Amendments are recorded on CPOMS so that all relevant staff are working from the most up-to-date version of the plan.