THE AMERICAN SCHOOL IN ENGLAND

Risk Assessment (inc. Student Access to Areas of Risk) Policy

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Document

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1. Introduction & Purpose

1.1. TASIS England (The School) is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

1.2. Under the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools (2015) and the Management of Health & Safety at Work Regulations, the School is required to manage the level of risk in all of its activities and provide a policy that describes the School's approach to managing that risk.

1.3. Staff and managers should manage and reduce risk to reasonable levels by identifying what the basic level of risk is, and if necessary put in place controls to reduce risk.

1.4. All staff should be alert to changing circumstances and should take appropriate actions to reduce or stop an activity if the level of risk seems inappropriate.

1.5. The results of a risk assessment and subsequent control measures should be communicated to the staff, students and visitors concerned.

1.6. The School has regard to Government recommended guidance and advice re: *Learning outside the Classroom (LOtC) - National Guidance* from the Outdoor Education Advisers' Panel (OEAP) on School trips and offsite activities.

1.7. This policy is inclusive of school arranged activities outside of usual school hours. It applies to all staff (teaching, boarding and support staff), the Board of Directors and volunteers working in the school.

1.8. All who work, volunteer or supply services to the School have an equal responsibility to understand and implement this policy and its procedures both within and outside of usual school hours including activities away from school.

1.9. Relevant risk assessments and any action taken in response to risk assessments will be monitored regularly by the Head of School or a relevant senior member of staff if the Head is in absentia.

1.10. Risk assessments and action taken in response to risk assessments relating to boarding students or the boarding provision will be raised and discussed at SLT meetings.

1.11. The purpose of this policy is:

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a.   to actively promote the wellbeing of all students, staff and volunteers at the School;

and

b.   to implement a framework for the assessment of risk(s) to the wellbeing of all who are at TASIS.

1.12. The highest priority is to ensure that all operations within the School environment, educational, pastoral, safeguarding and boarding are delivered in a safe manner which complies with both law, guidance and best practice.

1.13. It is acknowledged that risks are inherent in day to day life and they need to be identified along with the adoption of systems and controls to mitigate them.

2. Safeguarding

2.1. Safeguarding and child protection is the golden thread which is at the heart of the School. The School's policies and training for all faculty and staff form the core of our safeguarding and child protection risk management.

2.2. Safer recruitment policies and procedures reduce the exposure of the School to the risk of employing faculty and staff who are barred from working with children or are not allowed in the UK.

3. Risk Assessment

3.1. A risk assessment is a careful examination of what could cause harm to people in a specific environment or when undertaking a certain activity, so that identified hazards can be countered with precautions and/or actions to prevent harm.

3.2. The Board of Directors are legally required to assess the risks relating to:

a.   the living and study place of students and employees;
b.   the workplace.

3.3. Risk assessments focus on prevention rather than reacting to situations as they occur. Risks assessments should be reviewed and updated regularly. A Central Risk Assessment Repository is maintained by the School which contains risk assessments undertaken and maintained by staff members across the School who control specific areas. The Estates Manager is the Health and Safety and Fire Officer and as such is the contact person for risk assessments.

3.4. In assessing the risks in the workplace, the Board of Directors will require the Health and Safety and Fire Officer to:

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a.   look for the hazards, decide who might be harmed and how;
b.   decide whether the existing precautions are adequate or whether more should be done;
c.   record the findings, review the assessment and if necessary, revise it;
d.   ensure others are undertaking risk assessments for their area and completing 3.4.c above.

3.5. Regular and systematic inspections and risk assessments of all potential hazardous substances and work activities will be made by, or under the authority of, the Estates Manager who will take into account all the relevant regulations and codes of practice.

3.6. Specialist advice will be obtained if necessary and the risk assessment will be reviewed periodically. The significant findings will be recorded and appropriate preventative and/or protective measures taken as necessary.

3.7. The Board of Directors has established a Health and Safety Committee which meets At least three times per academic year. It reviews key high risk areas, risk assessment processes and discusses new and emerging risks for consideration and assessment by management. Specific risk assessments for which specialists are engaged by the Estates Manager include:

a. fire safety,
b. asbestos,
c. legionella,
d. gas Safety and
e. electrical Safety
f. boarding provision

4. Definitions
4.1. A **hazard** is something with the potential to cause harm.

4.2. A **risk** is an evaluation of the probability of the hazard occurring.

4.3. A **risk assessment** is the resulting assessment of the probability and impact to assess the severity of the outcome.

4.4. **Risk control measures** are the controls and procedures put in place to minimise the consequences of uncontrolled risk (e.g. staff training, fire alarms and clear work procedures.

5. Looking for Hazards
5.1. You can look for hazards by:
a.   consultation and conducting inspections of the workplace, analysing jobs;

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b.   adopting a 'what if' approach, noting all legislation and regulations as they apply to your workplace.

c.   Noting manufacturers' instructions, accident records, ill health records, etc., can help to identify hazards;

d.   Observing your environment;

e.   Liaising with colleagues using the same space.

6. Advice to All Staff

6.1. Staff should only identify hazards which could reasonably be expected to result in harm under the conditions of use of the space or activity in question.

6.2. Use the following examples as a guide:

a.   slipping / tripping hazards (e.g. poorly maintained floors or stairs);

b.   fire (e.g. from flammable materials)

c.   chemicals (cleaning fluids etc);

d.   moving parts of machinery;

e.   work at height;

f.   pressure systems, (e.g. gas systems and bottles);

g.   electricity (e.g. poor wiring);

h.   dust & fumes (e.g. welding, building work);

i.   manual handling;

j.   noise;

k.   poor lighting;

l.   low temperature;

m.   high temperature.

7. Is Risk Adequately Controlled?

7.1. Consider whether you have taken precautions against the risks from the hazards you listed? For example, is/are there:

a.   adequate information, instruction or training?

b.   adequate systems or procedures?

7.2. And do the precautions:

a.   meet the standards set by a legal requirement?

b.   comply with a recognised industry standard?

c.   represent good practice?

d.   reduce risk as far as reasonably practicable?

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e. If so, then the risks are likely to be adequately controlled, but you still need to indicate the precautions you have in place. You may refer to procedures, manuals, school rules, etc. If the risk is not adequately controlled, a risk assessment should be compiled.

8. Who Might be Harmed?

8.1. When preparing a risk assessment there is no need to list individuals by name, just groups conducting similar activities, or why they may be affected, e.g.:

a. teachers, classroom assistants, office staff, maintenance staff, contractors;
b. people sharing the space, cleaners, parents/guardians/carers;
c. pay particular attention to people with disabilities, young children, older people who may have mobility issues, visitors, inexperienced staff & lone workers.

9. Recording the Findings

9.1. Significant hazards, assessments and conclusions must be recorded and staff and students should be informed of the findings that impact upon them where relevant.

9.2. Relevant to their area, the Head of School, Estates Manager, Head of Maintenance and Division Heads should be able to show that:

a. all the obvious significant hazards have been addressed;
b. the precautions are reasonable;
c. the remaining risk is low.

9.3. Staff must ensure that records are kept for future reference. Regulators may request them or in the case of any legal action they may be required.

9.4. Risk assessments should be recorded in a way that describes:

a. an identifying description of the area being assessed
b. the date undertaken
c. the review date
d. the person undertaking the assessment
e. the agreement by a line manager
f. a description of the hazard(s)
g. the level of risk
h. who might be harmed and how
i. actions taken to lower risk, by whom & by when
j. confirmation the level of risk has been reduced

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9.5. Non-sensitive completed risk assessments should be uploaded to the relevant folder of the *Central Risk Assessment Repository* held on the TASIS internal shared drive (google at this time).

9.6. The purpose of the *Central Risk Assessment Repository* is to provide a single place where risk assessments are stored and where members of faculty and staff can access examples of completed risk assessments and guidance documents to assist in their completion.

10. Activities requiring Risk Assessments

10.1. There are numerous spaces and activities undertaken by the School, each of which requires its own risk assessment. These include:

   a. Fire
   b. Health & Safety
   c. Student activities
   d. Work based activities
   e. Boarding houses
   f. Some classrooms (science labs, art rooms etc)
   g. Events
   h. Food preparation and cooking
   i. Medical
   j. Playgrounds & breaktimes (Lower/Middle School)
   k. Recruitment
   l. School trips
   m. Security
   n. Sports
   o. Staff accommodation (off and on site)
   p. Risky areas
   q. Learning outside the classroom (LOtC)

10.2. **Medical and First Aid**

   a. The Health Centre has risk assessments for first aid and all other medical related treatments and procedures. The accident forms are maintained in the Health Centre. There are established procedures to be followed in the case of a medical emergency.

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Student Access to Areas of Risk

1. Aim

1.1. The aim of this Policy is to state the School's procedures for managing, controlling or denying unauthorised access by students to potentially dangerous or risky areas of TASIS England buildings and grounds.

1.2. Rather than having a formal procedure for each and every identified area of risk within the TASIS England site (and student access therefore) for the most part the flow of students around site and off-site is based on common sense and trust. However, it is acknowledged that there are times when a formal proactive or reactive instruction is required in the form of a risk assessment or another relevant instructive tool.

2. Introduction

2.1. The Board of Directors, the Head of School, SLT, faculty and staff of TASIS England are fully committed to ensuring the health, safety, welfare and wellbeing of all students at the School.

2.2. On a large and complex site such as this there will inevitably be areas within the buildings or grounds that are considered to present risks to the safety of students who may accidentally or deliberately stray into them.

3. Procedures

3.1. The School makes every effort to ensure that all potentially dangerous areas are, wherever possible, made secure by fencing, locking, access control, signage or otherwise physically preventing access to them.

3.2. Areas temporarily out of bounds are, where possible, fenced or cordoned off and appropriate warning notices are placed to describe the danger.

3.3. Areas of the School grounds away from the main buildings are illuminated where there is likely to be foot traffic, from dusk to dawn and efforts are made to recognise whether lighting levels elsewhere around the School grounds is suitable.

3.4. Any damage to out-buildings and garages that would allow easy access must be reported and repaired as soon as possible.

3.5. It is imperative that no tools, sharps, equipment or machinery are left unsupervised or in an inappropriate area on the site that students can access. Where anything is found to be a danger, it must be reported immediately to the Estates Manager or

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the Head of Maintenance and action taken to remove the risk, secure it, or declare the area out of bounds.

3.6. it is the responsibility of the member of staff in charge of any activity to explain to students what guidance/rules they must follow to ensure both their safety and the safety of others. Once the activity is finished it is the responsibility of that member of staff to account for the whereabouts for all the students involved and to secure the area, if appropriate.

3.7. Students are advised by boarding staff and advisors of the dangers of entering risky areas of the School. They are made aware that to enter such an area deliberately is regarded as a very serious disciplinary offence that will be dealt with in an appropriate manner.

3.8. TASIS England is protected by CCTV. Security officers tour the School site throughout the day and in the evening to make sure it is secure.

3.9. All main school buildings and boarding houses have access controlled doors that can be accessed by staff and students throughout the School day.

3.10. Boarding houses are timed to exclude students during the School day except at lunch times.

3.11. Students only have access to buildings that they need to access to undertake their daily business.

3.12. The School ensures that students do not have unsupervised access to potentially dangerous areas, such as the science laboratories and the Design Technology rooms, Gym, Sports Hall etc.

3.13. Doors to these areas are kept locked at all times when not in use. All flammables and laboratory chemicals are kept securely locked in appropriate storage facilities.

3.14. Students are not allowed to use gymnastic, athletic or climbing equipment without supervision.

3.15. Younger children at TASIS England are strictly supervised and are not allowed unsupervised access to the site.

4. Specific Areas of Risk

	Site	Risk assessment	Date	Review date	RA held?
a	The Lake, Thorpe Place	Yes	October 2018	October 2019	Risk Repository
b	Lower School playground	Yes	February 2018	February 2019	Risk Repository
c	Crossing point	Yes	October 2018	October 2019	Risk Repository
d	Maintenance dept.	Yes	November 2018	November 2019	Risk Repository
e	Workshops and storage buildings	Yes	November 2018	November 2019	Risk Repository
f	General - Trees	Yes	November 2018	November 2019	Risk Repository
g	General - Walkways	Yes	November 2018	November 2019	Risk Repository
h	General – Perimeter wall condition	Yes	November 2018	November 2019	Risk Repository
i	Tractor and school vehicles	Yes	November 2018	November 2019	Risk Repository
j	South car park	Yes	November 2018	November 2019	Risk Repository
k	Plant Rooms	Yes	November 2018	November 2019	Risk Repository
l	Outside events (BBQ's)	Yes	November 2018	November 2019	Risk Repository

- **The above areas have a specific Risk assessment completed on file which we review yearly, they are also subject to a weekly visual inspection by the grounds, maintenance and security teams.**

Example Risk Assessment for TASIS The American School in England

Risk Assessment for: Theatre & Gym storage in loft area	Date of Risk Assessment: XX/XX/XXXX Review from: XX/XX/XXXX	Review Date: XX/XX/XXXX
Carried out by: Fire Safety Officer	Approved by: Estates Manager	Date: XX/XX/XXXX

What are the Hazards?	Level of risk			Who might be harmed and how?	Control Measures			
	Low	Med	High		Action to be taken to lower the risk.	Action by whom?	Action by when?	Level of risk reduced to low
Ignition of Gym clothing and storage box's stored next to electrical equipment			X	ALL	Combustible materials to be moved 1m away from electrical equipment and floor marked out to provide clear area around equipment	SK	Completed January XXXX	LOW
Ignition of Theatre materials from florescent lights with no diffusers			X	ALL	Replace existing light fittings with new enclosed lamps	SK	Completed January XXXX	LOW
High fire loading of Gym clothing and poor house keeping			X	ALL	Gym department to improve house keeping and move towards storage of clothing in plastic storage box's	Gym staff	Started December XXXX	LOW
High fire loading of Theatre materials			X	ALL	Theatre staff carried out a removal of old clothing and unwanted props	NH	Carried out XXXXX High volume	MEDIUM

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							of clothing remains	
Storage behind single door and means of escape to Theatre storage side			X	STAFF	Removal of all materials stored behind the door leading to the stair case	SK	Carried out December XXXX	LOW
Harm to students in loft area			X	Students	Students are no longer allowed in the loft storage area	NH	December XXXX	LOW
Rick to PTA entering unfamiliar area with hazards		X		PTA	PTA members were asked not to use this area however this has not ceased	SM to follow up	December XXXX	
Staff reluctant to entre loft storage area		X		STAFF	RGF to meet with Theatre staff to explain the steps taken to reduce the risks in this area	RGF to meet ? 8th Dec		
Remaining high volume of materials and props in loft area not suitable for this purpose			X	ALL	RGF, CE, SM, NH met XX/XX/XXXX to discuss how to move forward with ideas of removal of more items, on/off site storage	Meeting to continue	November XXXX	

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5. Student Specific Welfare

A. **Responsibilities:** The Head of School, Estates Management Director of Boarding, the Designated Safeguarding lead and School Heads oversee student welfare and well-being issues, who at an operational level will:
- ensure that student's health, safety and well-being is adequately protected;
- ensure that all staff are aware of, and adhere to, the School' policies and procedures on student health, safety and welfare;
- ensure that key staff have clearly established roles and responsibilities;
- ensure that staff are appropriately trained to deal with student welfare issues;
- ensure that where concerns about a student's welfare are identified, the risks are appropriately managed;
- consult with staff, students, parents and others, where appropriate, to find practical solutions to welfare issues;
- ensure that standards of student 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.

B. **Student Welfare:** The Proprietor recognises their responsibility to safeguard and promote the welfare of students in its care. This responsibility encompasses the following principles:
- to support students' physical and mental health and emotional well-being (as well as their social and economic well-being);
- to protect students from the risk of harm and/or neglect;
- to recognise that corporal punishment can never be justified;
- to provide students with appropriate education, training, recreation and development activities both indoors and out;
- to encourage students to contribute to society;
- to protect students from the risk of radicalisation, extremism and being drawn into terrorism;
- to build students' resilience to radicalisation by actively promoting fundamental British values, enabling students to challenge extremist views;
- to assess the risk of children being drawn into terrorism and to provide appropriate support for those identified as being at risk;
- to ensure that students are provided with a safe and healthy environment so far as reasonably practicable; and
- to manage welfare concerns effectively.

C. The School recognises that individual students 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 young people of the same age in mainstream schools. The School is committed to promoting and safeguarding the welfare of all of its students having regard to the special requirements of individual

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students but, where appropriate or necessary, balancing the special requirements of individual students against the School's responsibilities to promote and safeguard the welfare of all its students. The school addresses its commitment to these principles through:

- **Prevention** - ensuring that all reasonable measures are taken to minimise the risk of harm to students and their welfare by:
  o ensuring through training that all staff are aware of and committed to this policy and the values set out;
  o establishing a positive, supportive and secure environment in which students can learn and develop;
  o including in the curriculum, activities and opportunities for PSHEE which equip students with skills to enable them to protect their own welfare and that of others; and
  o providing medical and pastoral support that is accessible and available to all students.
- **Protection** - ensuring all appropriate actions are taken to address concerns about the welfare of a student, whether of a safeguarding nature or otherwise. This includes:
  o sharing information about concerns with agencies who need to know and involving students and their parents appropriately; and
  o monitoring students known or thought to be at risk of harm and formulating and / or contributing to support packages for those students.

D. The School recognises that student welfare and well-being can be adversely affected by many matters whether in or away from School, including abuse, bullying, radicalisation, behavioural and health issues. The School has developed this policy and the policies in the table below, which set out full details of its procedures to safeguard and promote student health, safety and welfare in accordance with its duties under Part 3 of the ISSRs and the and details of those with overall responsibility for risk assessment.

E. **Risk Assessment:** Student safety and welfare at the School is paramount. The School have various systems to ensure that student welfare is safeguarded and promoted including the use of daily meetings where required, boarding team meetings, and student risk assessment sheets. These are regularly reviewed and overseen by the DSL. Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed, appropriate action will be taken to reduce the risks identified, and this will be recorded and regularly monitored and reviewed. The format of any assessment of risks may vary and may be included as part of the overall response to a welfare issue and/or by using the attached risk assessment form where appropriate. Regardless of the form used, the school's approach to promoting student welfare will be systematic and student

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focused. The information obtained through this process and the action agreed will be shared, as appropriate, with other staff, parents and third parties in order to safeguard and promote the welfare of a particular student or of students generally.

F. **Safeguarding and child protection:** With regard to safeguarding risks, and in accordance with current statutory guidance, including *Keeping children safe in education* (September 2018) and *Working together to safeguard children* (2018) and Part 3 of the ISSRs and the NMS, the School has systems in place to identify students 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 (including, in relation to those identified as being at risk of radicalisation, the Channel Police Practitioner), health services and other services, where appropriate or necessary. Full details of the School's safeguarding procedures are set out in the Safeguarding and Child Protection Policy. Further guidance on how staff should ensure that their behaviour and actions do not place students or themselves at risk of harm, or of allegations of harm to a student, is also set out in Staff Code of Conduct.

G. **Protection from radicalisation and extremism**: Details of the School's procedures to prevent students from becoming radicalised and/or being drawn into extremism and/or terrorism in accordance with the guidance in *Prevent Duty Guidance* for England and Wales 2015 (HM Gov) and the *Departmental advice on the Prevent Duty* (DfE) are also contained within the Safeguarding Policy. The School will meet these obligations by assessing the risk of students being drawn into radicalisation and/or extremism and/or terrorism and putting in place control measures to support those at risk. The School is committed to providing a safe space in which students 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, students 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.

H. **Anti-bullying:** The School has a written Anti-bullying policy which covers the School' approach to the management of bullying and cyber bullying.

I. **Behaviour:** The School has a written behaviour policy which sets out how it promotes good behaviour amongst students at the School and the sanctions to be adopted in the event of student misbehaviour. This policy contains further information about the School's performance of its duties under the Equality Act 2010 (and reasonable

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adjustments made for students with disabilities), support systems for students and liaison between parents and other agencies.

J. **Health and safety:** In accordance with its obligations under the Health and Safety at Work etc Act 1974 and with Part 3 of the ISSRs, TASIS as an employer has a duty to ensure the health, safety and welfare of employees and the health and safety of students and others affected by the Schools' operations, so far as is reasonably practicable. The School will meet this requirement by taking a sensible, proportionate and holistic approach to management of health and safety issues in accordance with its obligations and its health and safety policies and its policy on risk assessment of health and safety issues.

K. **Reporting**: When assessing risks to student welfare and well-being at the School, all staff should also consider whether the matter should be reported to outside agencies and /or regulatory bodies, including but not restricted to, Children's Services, the Police, (including, in relation to those identified as being at risk of radicalisation, the Channel Police Practitioner), Ofsted, CAMHS etc. Unless provided for otherwise in the School's policies or in statutory guidance, the member of staff concerned should discuss the decision to report to outside agencies and /or regulatory bodies with the Principal and/or the Designated Safeguarding Lead (where appropriate) before making such a report. If, at any point, there is a risk of immediate serious harm to a student, a referral should be made to children's social care immediately. Anybody can make a referral. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point. Wherever the School proposes to share information under this policy or related welfare policies, it will have due regard to the principles set out in the DfE advice note, "Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers" (Currently in force).

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Appendix 1: Guidance on Risk Assessment

Guidance on risk assessment: A student welfare risk assessment is a careful examination of what could cause harm to student welfare and to consider appropriate control measures, so that you can weigh up whether the School has taken adequate precautions or should take additional steps to prevent the risk of harm. The purpose of a risk assessment is not to create huge amounts of paperwork, but rather 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. When thinking about your risk assessment in this context, remember:

- a welfare issue is anything that may harm a student; to include cyber-bullying, abuse and the risk of radicalisation and extremism.
- the risk is the chance that a student 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 students could be harmed. This will generally be set out in the concern raised about a student's welfare.

Step 2: Decide who might be harmed and how: Identify individual students or groups of students who might be harmed and how they might be harmed by the concern raised.

Step 3: Evaluate the risks and decide on precautions: Decide what to do about the risks. 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 student's welfare. Where appropriate take into account any special requirements or protected characteristics.

Step 4: Record your findings and implement them: Make a written record of your significant findings - the concern, the issues, how student(s) might be harmed and what arrangements the School has in place to control those risks.
There is no prescribed format for this record, but any record produced should be simple and focused on control measures and the steps the School proposes to take to manage the risk.

Step 5: Review your risk assessment and update, if necessary: Review what you are doing for the students identified and across the School 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.

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