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1. Aims

New Avenue School aims to ensure that:

- All risks that may cause injury, harm, or safeguarding concerns to staff, pupils, and visitors are identified, and that control measures which are reasonably practicable are put in place to prevent or reduce risk.
- Risk assessments explicitly consider the needs of pupils with SEMH, high anxiety, and Emotionally Based School Avoidance (EBSA), recognising that anxiety and avoidance behaviours can create additional safeguarding vulnerabilities.
- Risk assessments are conducted and reviewed systematically, including both static risks (buildings, equipment, curriculum activities) and dynamic risks (behaviour, online activity, absconding, anxiety-related triggers).
- Risk assessments support compliance with statutory duties under:
  - KCSIE 2025 (safeguarding and online safety risk management)
  - Independent School Standards 2025, Part 3 (Welfare, Health & Safety of Pupils)
  - Working Together to Safeguard Children 2023 (multi-agency planning and risk management for vulnerable children)
  - DfE Filtering & Monitoring Standards (2025) for online safety risk assessment
- Staff, governors, contractors, parents, and pupils understand their roles in identifying, reporting, and managing risks.
- Risk assessment is embedded into everyday practice, including therapeutic provision, personalised learning, enrichment, and off-site activities.

2. Legislation and Statutory Guidance

This policy is informed by the following legislation, statutory guidance, and regulatory standards:

Health & Safety

- The Education (Independent School Standards) Regulations 2025, Part 3 – Welfare, Health and Safety of Pupils (updated Sept 2025).
- The Management of Health and Safety at Work Regulations 1999 – assessment of risks to staff and pupils, including new and expectant mothers.
- The Control of Asbestos Regulations 2012 – requirement for asbestos risk assessments.

- The Control of Substances Hazardous to Health Regulations 2002 (COSHH) – requirement for hazardous substances assessments.
- The Health and Safety (Display Screen Equipment) Regulations 1992 – requirement for display screen equipment assessments.
- The Regulatory Reform (Fire Safety) Order 2005 – requirement for fire risk assessments.
- The Manual Handling Operations Regulations 1992 – requirement for manual handling risk assessments.
- The Work at Height Regulations 2005 – requirement for work-at-height risk assessments.
- Health and Safety Executive (HSE) guidance – requirement for pool risk assessments where schools manage swimming pools.
- DfE guidance on First Aid in Schools – requirement for first aid provision to be risk assessed.

Safeguarding and Pupil Welfare
- Keeping Children Safe in Education (KCSIE 2025) – requirement that schools assess safeguarding risks, including:
    - Online safety, including filtering/monitoring systems, mis/disinformation, conspiracy content, and AI use.
    - Additional vulnerabilities of pupils with a social worker, LAC/PLAC, or those with high levels of anxiety/EBSA.
    - Safeguarding arrangements for pupils in alternative or part-time provision.
- Working Together to Safeguard Children (2023) – requirement to work with safeguarding partners and contribute to multi-agency risk management plans.
- Prevent Duty Guidance (2021, with updates referenced in KCSIE 2025) – requirement to assess risk of pupils being drawn into terrorism or extremist activity.
- Equality Act 2010 – requirement to assess risks of discrimination and ensure reasonable adjustments for pupils with SEND/SEMH.

Online Safety and Data Protection
- DfE Filtering and Monitoring Standards (2025) – requirement for schools to carry out an annual online-safety risk assessment and evidence governance oversight.
- Data Protection Act 2018 / UK GDPR / Data Protection and Digital Information Act 2025 (DUAA 2025) – requirement to risk assess data processing, including filtering/monitoring logs and AI-assisted tools.

3. Definitions

Risk assessment
A structured process for identifying hazards and evaluating risks linked to a particular activity, environment, or situation. The process establishes whether enough precautions are in place and what further action is required to reduce the likelihood of harm. At New Avenue School, risk assessment covers health and safety hazards, safeguarding concerns, online activity, and SEMH/EBSA-related vulnerabilities.

Hazard
Something with the potential to cause harm to people, property, or the organisation. Hazards may be:
- Physical (e.g. chemicals, working at height, unsafe equipment).
- Safeguarding-related (e.g. absconding, peer-on-peer abuse, online exploitation, mis/disinformation).
- Health-related (e.g. medical conditions, stress, fatigue, infection).
- Contextual (e.g. off-site trips, transport, alternative provision, lone-working).

Risk
The likelihood that a hazard will cause harm, combined with the potential severity of the outcome. Risk may be:
- Low, medium, or high – depending on likelihood and impact.
- Dynamic – changing in response to environment, behaviour, or context (e.g. anxiety triggers during EBSA reintegration, escalation in behaviour, or online incidents).

Control measure
An action, procedure, or system put in place to eliminate or reduce risk to an acceptable level. Control measures at New Avenue may include:

- Physical measures (e.g. PPE, safe equipment, secure buildings).
- Procedural measures (e.g. supervision ratios, safeguarding reporting routes, fire drills).
- Therapeutic/educational measures (e.g. phased timetables for EBSA pupils, safe spaces, online-safety education, staff training).
- Technical measures (e.g. filtering and monitoring systems, encryption, cyber-security tools).

4. Roles and Responsibilities

Governing Board

The governing board has ultimate responsibility for health and safety and safeguarding risk assessment. The board will:

- Take reasonable steps to ensure staff and pupils are not exposed to unacceptable risks to their health, safety, or welfare.
- Oversee compliance with Independent School Standards 2025, Part 3 (Welfare, Health & Safety of Pupils).
- Scrutinise risk assessment practice across all areas: health and safety, safeguarding, online safety, and curriculum delivery.
- Receive and review reports on filtering/monitoring systems, online-safety risk assessments, and safeguarding incidents each term.
- Ensure risk assessment processes reflect the specific needs of pupils with SEMH, anxiety, and EBSA.

Headteacher / Head of Operations

The Headteacher and/or Head of Operations is responsible for:

- Ensuring that all required risk assessments are completed, recorded, and reviewed.
- Embedding risk assessment into day-to-day practice, curriculum planning, therapeutic provision, and enrichment activities.
- Approving off-site visit risk assessments and dynamic adjustments where safeguarding or EBSA risks are present.
- Ensuring staff are trained and competent to contribute to and implement risk assessments.

Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding-related risk assessment. They will:

- Lead on risk assessments involving safeguarding, online safety, EBSA, and pupils with additional vulnerabilities (e.g. LAC/PLAC, pupils with a social worker).
- Monitor filtering and monitoring alerts, working with the ICT lead to identify safeguarding risks.
- Ensure risk assessments link to EHCP outcomes, behaviour support plans, and multi-agency plans.
- Escalate safeguarding risks through the appropriate local authority or safeguarding partner.

ICT Lead / Oakford Technology

The ICT lead, supported by Oakford Technology, is responsible for:

- Conducting risk assessments relating to ICT systems, filtering/monitoring, cyber security, and data protection.
- Ensuring compliance with the DfE Filtering & Monitoring Standards (2025).
- Reporting technical and cyber risks to the Headteacher, DSL, and governors.

School Staff and Volunteers

All staff are responsible for:

- Assisting with, and participating in, risk assessment processes as required.
- Familiarising themselves with risk assessments relevant to their role.
- Implementing agreed control measures.
- Remaining vigilant to dynamic risks, particularly linked to behaviour, anxiety, or EBSA, and reporting new concerns promptly.

Pupils and Parents/Carers

Pupils and parents/carers are responsible for:

- Following advice in relation to risks, both on- and off-site.
- Reporting hazards or concerns to a member of staff.

- Working with staff to implement individual risk assessments where therapeutic or attendance-related adjustments are required (e.g. phased timetables for EBSA pupils).

Contractors

Contractors must:
- Provide evidence that they have carried out risk assessments for their planned work.
- Work in line with the school's safeguarding and health and safety requirements.

5. Risk Assessment Process

When assessing risks at New Avenue School, we follow a structured process that applies to health and safety, safeguarding, online activity, curriculum delivery, and off-site activities. Staff are involved where appropriate to ensure hazards are fully identified and control measures are workable in practice.

Step 1: Identify Hazards

We consider all activities, processes, and environments within the school and establish what hazards could injure, harm, or place pupils at safeguarding risk. Hazards include but are not limited to:
- **Physical** (unsafe equipment, manual handling, chemicals, working at height).
- **Safeguarding** (peer-on-peer abuse, absconding, online exploitation, radicalisation, mis/disinformation).
- **Health/medical** (conditions requiring treatment plans, stress, fatigue, infection control).
- **Behavioural/SEMH** (anxiety triggers, EBSA, escalations, self-harm risk).
- **Contextual** (off-site visits, transport, alternative provision, lone working).

Step 2: Decide Who May Be Harmed and How

For each hazard we identify which groups may be affected, for example:
- Pupils, including those with EHCPs, SEND, SEMH, high anxiety, or EBSA.
- Staff, volunteers, visitors, contractors.
- Parents or members of the public during school activities.

We then consider how harm might occur, e.g. physical injury, emotional harm, safeguarding breach, or disruption to education.

Step 3: Evaluate the Risks and Decide on Control Measures

For each hazard we:
- Assess the likelihood of harm and potential severity (low, medium, high).
- Review existing controls to determine effectiveness.
- Decide what additional measures are required, balancing proportionality with the level of risk.
- Consider therapeutic and educational controls, such as phased reintegration for EBSA pupils, staff supervision strategies, online-safety education, and use of filtering/monitoring tools.

Step 4: Record Significant Findings

The findings from Steps 1–3 are recorded in a written risk assessment. Records will:
- Identify the hazard, risk, control measures, and responsible staff.
- Include consideration of pupils with particular needs or vulnerabilities.
- Be stored securely and shared with relevant staff.

Step 5: Review and Update

Risk assessments are reviewed as required and formally at least annually. We ask:
- Have there been significant changes (e.g. new pupils, staffing changes, premises alterations, emerging online risks)?
- Are improvements still needed?
- Have staff, pupils, or parents identified new concerns?
- Have we learned from incidents, near-misses, or monitoring alerts?
- Have filtering/monitoring reports or safeguarding logs identified new online risks that require updates to risk assessments?

Step 6: Retaining Risk Assessments
Risk assessments are retained for a minimum of three years after their period of use. Records are stored securely in line with the Data Protection Act 2018, UK GDPR, and the Data Protection and Digital Information Act 2025 (DUAA 2025).

6. Pupil Welfare and Safety During Off-Site Activities

At New Avenue School, pupils' welfare, safety, and individual needs are at the centre of all planning for off-site activities, including trips, visits, enrichment, outdoor learning, and any provision delivered Beyond the Classroom.

We recognise that many of our pupils present with SEMH needs, high anxiety, or EBSA, and therefore off-site activities may present additional dynamic risks. Risk assessments must address these carefully and proportionately.

Pre-Trip Risk Assessments
- A tailored risk assessment is completed for every off-site activity, covering the activity, location, staffing, transport, and participant group.
- The Headteacher or delegated senior leader must approve all off-site risk assessments before the activity takes place.
- **Safeguarding and absconding risks are explicitly considered**, including the impact of busy environments, travel routes, and triggers for anxiety.
- **Online risks are considered**, e.g. pupils using personal devices during trips, exposure to inappropriate content, or location-sharing on social media.

Consideration of Individual Pupil Needs
- Staff must consider risks linked to individual pupils' EHCPs, ISPs, and known needs.
- Specific factors may include:
    - Medical conditions and equipment needs.
    - Behavioural needs or potential for escalation.
    - Safeguarding concerns, including pupils with a social worker or LAC/PLAC.
    - EBSA/anxiety vulnerabilities – including tolerance of transitions, crowded spaces, and separation from familiar adults.
- Where necessary, **individual risk assessments** are prepared to supplement the trip assessment.

Supervision and Staffing
- Supervision ratios are set according to DfE guidance and the assessed needs of pupils.
- Ratios will be increased where EBSA, high-anxiety, or behavioural risks require additional support.
- At least one staff member trained in first aid and safeguarding must accompany each visit.
- Volunteers and external supervisors must receive clear instructions and be briefed on safeguarding expectations.

Emergency Procedures
- Each trip has a clear emergency procedure covering:
    - Medical incidents
    - Accidents and injuries
    - Absconding or missing pupils
    - Behavioural escalations
    - Severe weather or travel disruption
- Staff are issued with:
    - Emergency contacts for the DSL and SLT
    - A charged school mobile phone
    - Contact details for parents/carers and Local Authority where relevant

Transport Safety
- A transport risk assessment is completed for all trips, covering:
    - Vehicle condition and suitability
    - Driver competence and checks

- o Seatbelt use and seating plans
- o Impact of long journeys on EBSA or anxiety presentation
- o Supervision ratios for public transport

Ongoing Monitoring During Off-Site Activities
- Staff remain vigilant to **dynamic risks** and adapt control measures in real time.
- Any incident or near-miss must be recorded and reported to the Headteacher/DSL.
- Risk assessments are updated after incidents to improve planning for future activities.

7. Monitoring and Evaluation

Whole-school risk assessment policy

The school has a written whole-school risk assessment policy in place, in line with the Independent School Standards (Part 3 – Welfare, Health and Safety of Pupils).

The policy sets out how risks to pupils, staff, and visitors are identified, managed, and reviewed across all aspects of school life. This includes supervision, movement around the site, daily routines, curriculum delivery, therapeutic provision, online activity, and off-site activities.

Risk assessment practice reflects the needs of pupils with SEMH, anxiety, and Emotionally Based School Avoidance (EBSA), recognising that emotional regulation, behaviour, and transitions may present dynamic risks.

Consideration of proposed registered capacity

The school has considered the implications of a proposed increase in registered pupil capacity as part of its ongoing risk assessment and forward-planning processes.

This consideration does not represent a change to the school's current registration or operating arrangements and is subject to regulatory approval.

As part of this consideration, the school has reviewed:
- the effectiveness of existing control measures
- supervision arrangements and staff deployment
- movement, transitions, and use of space
- staffing structures and routines
- the potential impact on pupils with SEMH, anxiety, and EBSA

This consideration indicates that the school's health, safety, and risk management systems are scalable and capable of supporting an increased capacity, should approval be granted, without compromising pupil welfare or safety.

Supervision and movement arrangements

Supervision arrangements are structured around small-group teaching and clear staff deployment.

Pupils are taught in groups of up to **4 pupils to 2 adults** (1 teacher and 1 teaching assistant). This model provides consistent supervision within classrooms and supports safe movement around the building.

Movement between spaces is planned and supervised, with clear routines in place. These arrangements remain consistent and are subject to ongoing review.

The school is satisfied that its health, safety, and risk management systems are robust and scalable, subject to regulatory approval.

Oversight

Risk assessments are written as needed and reviewed regularly by the Head of Operations.

The Headteacher reviews this policy annually and presents it to the governing board for approval.

Safeguarding and EBSA

The Designated Safeguarding Lead (DSL) leads on risk assessments relating to safeguarding, EBSA, behaviour, and online safety.

The DSL ensures that risk assessments link directly to EHCP outcomes, Individual Support Plans, and multi-agency plans where applicable.

EBSA-specific risks, including absconding, avoidance triggers, and anxiety escalation, are monitored dynamically and discussed through SLT meetings.

Staff involvement

Staff contribute to risk assessments through consultation and by reporting hazards, incidents, and near misses.

Staff receive regular training on recognising and reporting emerging risks, including safeguarding concerns, online risks, and SEMH-related vulnerabilities.

Review cycle

Risk assessments are formally reviewed at least annually, or sooner if:
- there is a significant incident, accident, or near miss
- new pupils or staff join with specific needs
- the physical or online environment changes
- new risks emerge from monitoring systems, filtering reports, or safeguarding logs

Lessons learned from incidents are incorporated into updated risk assessments.

Policy evaluation

The effectiveness of this policy is evaluated through:
- compliance with Independent School Standards (Part 3), KCSIE, and relevant health and safety legislation
- audit outcomes and governing board scrutiny
- staff and pupil feedback on safety and support
- evidence of safe participation and improved outcomes for pupils with SEMH, anxiety, and EBSA

Updates	
Dates	**Comments**
06.03.25	No updates
01.07.25	Added Section 6 - Pupil Welfare and Safety During Off-Site Activities
16.09.25	Full policy review: updated Sections 1–7 to align with ISS 2025, KCSIE 2025, Working Together 2023, and DUAA 2025. Expanded scope to include safeguarding, online safety, EBSA, and DfE Filtering & Monitoring Standards.
27.01.26	Policy reviewed. Section 7 (Monitoring and Evaluation) expanded to strengthen oversight, supervision, and review arrangements, and to record consideration of a proposed increase in registered capacity as part of forward planning. No change to current registration or operating arrangements.

Appendix 1: statutory risk assessments checklist

The following table lists the risk assessments that schools are required to have in place. Please note that all of these have been subject to review, so 'Completed by' refers to when they were first completed.

Statutory or mandatory risk assessment	✓	Completed by	Date of next review
Workers under the age of 18	n/a	n/a	n/a
Asbestos	✓	Danguard Ltd – January 26	n/a – No asbestos on site.
Substances hazardous to health	✓	CPr – September 25	September 26
Display screen equipment	✓	CPr – October 25	October 26
Fire	✓	Lionel Gresham – May 2024	May 2027
First aid	✓	AMe – March 24	February 27
Manual handling	✓	CPr – September 24	September 26
Working at height	n/a	n/a	n/a
Children being drawn into terrorism	✓	March 24	January 27
Swimming pools (if applicable)	n/a	n/a	n/a