



Mill Hill  
EDUCATION GROUP

# Risk Assessment Policy

Instilling values, inspiring minds

# Risk Assessment Policy

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## 1. Introduction

Mill Hill Education Group (the 'Group') is the trading name of The Mill Hill School Foundation and is a group of independent mainstream Schools which together educate girls and boys aged 3 to 18 years. It currently comprises:

### **Senior Schools (day and boarding)**

Mill Hill School  
Mill Hill International  
Cobham Hall

### **Pre-Preparatory/Preparatory (day)**

Grimsdell Pre-Preparatory School  
Lyonsdown School  
Keble Prep  
St Joseph's in the Park  
Belmont Preparatory School

This Policy covers all the Group's Schools, including EYFS pupils.

The Foundation is a registered charity and a company limited by guarantee, employing both teaching and non-teaching staff. Legal responsibility rests with the company acting by the Court of Governors, and the Head of the respective School having day to day responsibility for the management of the schools and the care of pupils.

This policy has been reviewed in accordance with the statutory guidance set out in Part 3 – Paragraph 16. Welfare, health and safety of pupils, Handbook for the Inspection of Schools (Comment on the Regulatory Requirements) – (Independent School Standards) Regulations 2019 (ISSR) effective September 2019. and in line with the Group's responsibilities under the Management of Health and Safety at Work Regulations 1999, the DfE's statutory guidance Keeping Children Safe in Education, the NMS Boarding Standards, and the Early Years Foundation Stage (EYFS) Framework.

The Court of Governors of Mill Hill Education Group is committed to promoting the safety and welfare of all in the Group community so that effective education can take place. We aim to provide a safe environment for staff, parents, pupils and visitors by ensuring that all our educational and support operations are delivered in a safe manner that complies with legislation and follows best practice.

Risks are inherent in everyday life and the Group recognises the need to take a broad approach to the area of risk assessment to ensure that it covers all aspects of pupil welfare, identifies risks, and adopts effective systems for minimising them. To achieve this, we undertake risk assessments to assist in managing the health and safety of the Group. This Policy explains the Group's approach to managing risk and identifying appropriate measures to control risks that have been identified.

The guidance is applicable to all those with responsibility for undertaking risk assessments for activities which are under their control.

## 2. Related Policies

This policy should be read in conjunction with the following other policies:

- Health and Safety Policy, in particular the clauses relating to Risk Assessments and Individual Responsibility
- Safeguarding and Protecting the Welfare of Pupils Policy
- Fire Safety Policy
- Educational Visits
- First Aid Policy
- Supervision Policy for the respective School

## 3. Objectives

- To ensure that suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk.
- That identified control measures are implemented to control risk so far as reasonably practicable.
- That those affected by school activities have received suitable information on what to do.
- That risk assessments are recorded and reviewed when appropriate ensuring that staff responsible for assessing risk have the training to understand and record when and how a risk assessment is completed.

## 4. Guidance

Whilst the ultimate responsibility for risk management overall lies with the Court of Governors (including the risk assessment process), its operational management of Health and Safety, and risk management has been delegated to the Director of Operations (DO), and the Heads and their Senior Leadership/Management Teams (SLT/SMT).

The Group identifies key areas of School management that present risks to the School community – these include, but are not limited to, the following:

- Safeguarding
- Pupil welfare (including SEND and Medical)
- Health and Safety
- Security
- Fire safety
- Critical incidents
- School trips
- Staff recruitment (for further information, please see the school's Recruitment, Selection and Disclosure Policy)

This policy applies to all staff, contractors and the wider school community who all have an obligation to assist in creating a safe working, teaching and boarding environment both on and off-site. All Staff have a duty to take reasonable care for themselves and other persons who may

be affected by their actions and to support the Group in providing a safe environment by reporting accidents and identifying potential hazards.

The DO is responsible to the Chair of the Estates Committee for implementation and annual review of this policy.

This guidance is applicable to general risk assessments (see above, however where specialist skills are required, e.g. assessing risk with regards asbestos, fire, water quality and hazardous substances, these may be outsourced to a competent professional.

## **5. What is Risk Assessment?**

Risk assessment is an important step in protecting the whole School community, as well as complying with the law. The law accepts that not all risks can be eliminated entirely, but people must be protected from harm (by taking reasonable control measures), as far as is reasonably practicable. The Risk Assessment process helps focus on the risks that really matter in the Schools - the ones with the potential to cause harm.

The Group is legally required to assess the risks in Group premises (and sometimes off-site during school trips etc.) so that they can put in a plan in place to control the risks.

In their guide 'Five Steps to Risk Assessment' The Health & Safety Executive (HSE) advocate the application of a hierarchy of measures which aim to eliminate or minimise risk:

- Elimination
- Substitution
- Engineering controls
- Administrative controls
- Personal protective clothes or equipment

Risk assessments can be used to identify potential hazards to people (e.g. trip hazards) and property (e.g. a fire). They are used also to identify strategic hazards (e.g. damage to the Group's reputation), financial hazards (e.g. a decline in pupil numbers), compliance hazards (e.g. failing to follow safeguarding requirements) and environmental hazards (e.g. legionella). Apart from being a legal requirement, risk assessments therefore make good sense, focusing on prevention, rather than reacting when things go wrong.

The risk assessment process will consist of the following 5 steps:

- 1) Identify the hazard (potential to cause harm)
- 2) Decide who might be harmed and how
- 3) Evaluate the risk and decide on precautions (likelihood/severity of harm, necessary control measures)
- 4) Record your findings and implement them
- 5) Review your assessment and update in necessary

A risk assessment checklist is completed at the start of each academic year by Heads of Departments to assist them at local level. Risk assessments will be reviewed:

- when there are changes to the activity
- after a near miss or accident
- when there are changes to the type of people involved in the activity
- when there are changes in good practice
- when there are legislative changes
- annually if for no other reason

Risk assessment training is provided for specific roles and will be provided on specific areas as appropriate. A number of key staff are IOSH trained, and the School Health and Safety Advisor is NEBOSH qualified.

The schools follow best practice advice and comply with the regulatory requirements regarding risk assessments for science and technology activities. The Risk Assessment model used by the Group is principally that recommended by the Institution of Occupational Safety and Health. All risk assessments undertaken are regularly reviewed and updated if required.

Risk assessments are carried out by individual members of staff with specific responsibility for a particular event or activity, equipment or facility where there is potential for someone (staff, pupil or visitor) to be harmed. Harm may arise for a number of reasons including poor condition of equipment or facilities, introduction of new equipment, failure to comply with operating procedures, lack of training or changes to people, buildings or equipment.

Each School's SLT/SMT will be responsible for the maintenance of risk assessment records and for directing training where it is needed as appropriate.

## **6. Independent Review**

The Group uses specialist Health and Safety advisors where required, for example regarding in-School radioactivity protection. The expert conducts regular reviews, and with input from the staff involved in the work activities being assessed, will advise the school on providing a safe environment and assessing risks.

## **7. Operational Risk – Specific Arrangements**

There are numerous activities carried out at the Group, each of which requires its own separate risk assessment. Such areas in which risk assessments are of particular importance are:

- Early Years Group Stage (EYFS) activities
- Educational Visits and Trips
- The day-to-day supervision of pupils
- Fire safety
- Health and Safety
- Swimming Pool safety
- Buildings and footpaths

Other examples of the kinds of potential risk or hazard that have been identified and addressed by a risk assessment at the Group or one of its Schools are:

- sports training and matches
- sports and PE facilities, such as the Swimming Pool
- school facilities, such as classrooms and science laboratories
- school trips
- leaf mincer and bleeding canker infection
- ponds on the Group estate
- public coming onto the Group estate to use the Sports Hall facilities or trespassing from the rights of way
- traffic using the School Car Parks
- slip and trip hazards

Other specific areas of risk include:

- **Maintenance and Grounds:** Risk assessments and training are required for every tool and item of equipment, as well as for manual handling, slips and trips, working at height, lone working, asbestos, control of contractors on site, electricity, gas, water, swimming pool maintenance and the control of substances hazardous to health (COSHH). Induction and refresher training covers risk assessments, safe working practices, communication and health and safety notices and protective equipment.
- **Office-based Administrative Staff:** Risk assessments are required in respect of Display Screen Equipment (DSE), lighting, noise, heat and cables for staff (primarily office-based) who spend the majority of their working day in front of a screen.
- **Medical Facilities:** The Medical Centre, located between MHS and Grimsdell School, represents particular risks associated with hygiene and infection control, storage of medicines and general safeguarding considerations when treating pupils, especially EYFS pupils. The Group Nurse Manager is responsible for ensuring appropriate risk assessments are maintained and controls are in place to safeguard pupils and staff, and control medicines.
- **Special Events:** A risk assessment is undertaken when a special event takes place at the Group. These risk assessments can be very detailed for major events, such as the Mill Hill Parents' Association Fireworks Party to routine events, such as Sports Days or Foundation Day.
- **The Letting of Group Premises to Outside (Non-School) Organisations:** When school facilities/premises are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the Group must ensure that these organisations have appropriate arrangements in place to keep children safe. A risk assessment is done as a pre-condition to the let, and the School seeks proof that they have appropriate health and safety, and safeguarding policies and procedures in place, and insurance at an appropriate level. These requirements are included in every lease or hire agreement as a condition of use and occupation of the premises, and failure to comply with this will lead to a termination of the contract.

## 8. Assessing Risks to Pupil Welfare

The Group recognises its specific responsibility to safeguard and promote the welfare of pupils in its care, including with regards assessing risk. Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed, appropriate action will be taken to reduce the risks identified, which will be recorded and then regularly monitored and reviewed.

The format of risk assessment for pupil welfare may vary and may be included as part of the Group's overall response to a welfare issue or by using a risk assessment form. Regardless of the format used, the Group's approach will be systematic with a view to promoting pupil welfare.

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

With regards to safeguarding risks, and in accordance with current statutory guidance, including [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education) and [Working Together to Safeguard Children](#) and [Part 3 of the ISSRs](#), the Group 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 necessary.

Full details of Group safeguarding procedures are in the Safeguarding and Protecting the Welfare of Pupils Policy, the Low-level Concerns about Staff Policy, and the Online Safety Policy.

For full details regarding safer recruitment and the necessary checks which mitigate risks in the recruitment of staff, please see the Recruitment, Selection and Disclosure Policy. In keeping with the requirements of Keeping Children Safe in Education, the Group extends this safer recruitment regime to Governors, volunteers, contractors, agency and supply workers and the members of the families of staff aged over 16 years who are accommodated on site.

Where there has been a report of sexual violence, the DSL will undertake an immediate risk assessment. If there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis by the DSL. Where a pupil is convicted or receives a caution for a sexual offence, the DSL will update the risk assessment to ensure relevant protections are in place for all pupils at the school.

As required by section 26 of the Counter-Terrorism and Security Act 2015, the school will conduct risk assessments to determine the likelihood of local terrorist threats/actions, and the appropriateness of any filters and monitoring systems needed to control the risk of pupils being drawn into.



## 9. Strategic Risk

The Mill Hill School Foundation is a Company (Company No 03404450) and a Charity (Charity No 1064758). Each year the Court of Governors examine the major risks faced by the Foundation, and Mill Hill Education Group, to ensure systems are in place to monitor and control these risks and to mitigate any impact that they may have on the Charity and its Schools in the future. A central risk register is maintained for the purposes of reviewing and monitoring risks across the Group and the register is reviewed on an annual basis by the Estate Committee.

The Court assesses the principal risks as being potential loss of reputation, declining school rolls and failure in safeguarding of students. It is recognised that systems can provide reasonable but not absolute assurance that major risks have been managed adequately.

Key controls applied in the Company and in turn the Charity include:

- An established organisational structure with clear lines for reporting
- Terms of reference and regular training for governing bodies and their executive committees
- Comprehensive strategic planning, budgeting and management reporting
- Formal written policies which are reviewed each year
- Monitoring of financial, investment and professional performance
- Vetting procedures as required by law for the protection of the vulnerable

## 10. Financial Risk

The Group's Fraud Risk Assessment will be reviewed annually by Governors as part of the annual audit process. Our auditors test selected areas at risk of fraud have been assessed, existing controls identified, reviewed and improvements are suggested where appropriate. The Fraud Risk Register is reviewed annually by the Audit Committee.

## 11. The Foundation and Group Approach to the Management of Risk

The annual Report of the Governors includes a review of the significant risks facing the Foundation, the Group and the Charity and the controls employed to mitigate these risks which are recorded in the Risk Map. The Governors determine the assessment of main risk areas that the Group may face, such as compliance with the Group's charitable objectives, loss of fee income, financial controls and safe recruitment of staff, and introduced policies and procedures to monitor the controls established to mitigate those risks. The Governors undertake regular reviews of policy, procedures and controls. The Risk Map is reviewed annually.

The Risk Assessment model used by the Group is principally that recommended by the Institution of Occupational Safety and Health. All risk assessments undertaken are regularly reviewed and updated if required. The Schools follow best practice advice and comply with the regulatory requirements regarding risk assessments for science and technology activities.

The Group has a First Aid Policy and the Medical Centre has written procedures for all aspects of its operation, including care for illness, accidents and injuries, the GP and immunisation service, travel vaccinations, administration of medicines, planning for special dietary needs and allergies. Accident forms are held at the Medical Centre and at each of the Group Schools. When an accident occurs the Nurse, First Aid Lead or First Aider is responsible for ensuring that the accident report is completed and if appropriate passed to the DO for information and assessment and who will make any necessary reports under RIDDOR. All accidents reported to the DO and notifiable near misses will be reviewed by the Health and Safety Committee which meets each term, with a view to assessing whether any measures need to be taken to prevent recurrence. Statistics re accidents and injuries are considered at every school's Health & Safety meeting, and scrutinized by the Group Health and Safety Committee. Occurrence of pupil illness is discussed with the SLT/SMT in each School on a half-termly basis (at the least). Findings from both will be fed back to the Governors by the Estates Committee of the Court of Governors.

The Group Security Policy provides a strategy for the effective delivery of a safe and secure environment which is a shared responsibility of all staff and to ensure that the Group has regard to consideration of newly arising threats which are addressed through risk management. Pupils are expected to be actively involved to protect themselves and others from risk, safeguard property and support the Group's security strategy to ensure that the Group has regard to consideration of newly arising threats which are addressed through risk management. Risk assessments cover identified major risks, including fire and security risks.

Pupils are normally involved only in low-risk activities while at the school, or when on school trips. The pre-activity risk assessment will identify whether specialist instructors are required for specific medium-risk activities for older pupils (e.g. sailing, skiing and CCF training). Pupils are always given a safety briefing before participating in these activities, are required to wear the appropriate protective equipment and to follow instructions. Any high-risk activities, such as shooting, will be allowed only under the control of specialist instructors.

### **13. Review**

This Policy shall be reviewed every two years.

Last Review: February 2024

Next Review: Spring 2026

This Policy was approved by the Governance Committee of the Court of Governors, 22<sup>nd</sup> February 2024.

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Mill Hill  
EDUCATION GROUP

The Mill Hill Education Group is the brand name for The Mill Hill School Foundation.

Registered in England: number 3404450

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Registered charity number: 1064758.

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