Trust Education Group Ltd

Risk Assessment Policy for Pupil Welfare

Introduction

This policy sets out how Trust-Education Group Ltd safeguards and promotes the welfare of pupils through robust, proportionate and continuously reviewed risk assessment processes. As an independent SEMH school for pupils aged 11–16, the Trust recognises its responsibility under the Education (Independent School Standards) Regulations 2014 to ensure that the welfare, health and safety of pupils are rigorously protected through the implementation of an effective written risk assessment policy.

Trust Education group is committed to embedding a strong safeguarding culture, as required by Keeping Children Safe in Education, where staff maintain professional curiosity, take timely action and uphold the principle that safeguarding is everyone's responsibility. All risk assessment practice must reflect the needs of the pupils, many of whom present with complex SEMH profiles, histories of trauma, contextual vulnerabilities or fluctuating emotional states.

This policy ensures that leaders, staff, and governors can demonstrate compliance with statutory responsibilities, including those outlined in Working Together to Safeguard Children, the Prevent Duty, the Equality Act 2010 and all relevant health and safety legislation.

Aims of the Policy

The aim of this policy is to ensure that Trust-Education Group Ltd meets its statutory duty to safeguard pupils by implementing a rigorous and evidence-based approach to risk assessment. This includes preventing foreseeable harm, identifying emerging concerns, taking timely protective action and enabling pupils to access education safely.

This policy ensures that risk assessment processes are trauma-informed, relational and grounded in the needs of SEMH learners. Staff are expected to understand pupils' lived experiences, barriers to communication, potential triggers, and vulnerabilities that may influence behaviour, emotional regulation or safety.

The policy supports Ofsted's expectations that safeguarding must be effective, consistently applied, well understood by all staff and demonstrably reducing risk for children. It also supports DofE expectations for high-quality specialist provision where leaders maintain strong oversight of pupil welfare and risk.

Application

This policy applies across all areas of the school, including classrooms, therapeutic and pastoral spaces, outdoor area, dining areas, specialist rooms, intervention spaces, transport arrangements, community learning, off-site activities, alternative provision, and all online or remote learning.

It applies to all staff, governors, volunteers, contractors, visiting professionals and partner organisations working with Trust-Education Group Ltd.

The principles apply at all times, including during transitional moments, unstructured periods, enrichment activities and community engagement.

Definitions

Parents refers to biological parents, adoptive parents, foster carers, guardians or any adult with parental responsibility or day-to-day care.

Pupil welfare includes physical safety, mental health, behaviour, emotional wellbeing, online activity, contextual risks, peer relationships, attendance and any factor influencing a pupil's wellbeing.

This Policy refers to the Risk Assessment Policy for Pupil Welfare for Trust-Education Group Ltd.

Responsibility and Governance

The Trust Board of Governors at Trust-Education Group Ltd has strategic oversight of safeguarding, including risk assessment practice. The Board ensures compliance with statutory requirements, monitors implementation and evaluates impact. Leaders provide assurance to the Board that risks are being identified, assessed and managed effectively and that safeguarding is embedded throughout the school.

Trust Education Group complies with the Independent School Standards, the Equality Act 2010, the Children Act 1989, the Prevent Duty, Working Together to Safeguard Children, and the data protection requirements of UK GDPR. Trust Education group ensures that staff understand their obligations and receive appropriate training.

All staff receive safeguarding, child protection, SEMH, trauma-informed practice, risk assessment and safer working practice training on induction and throughout their

employment. The DSL (Katie Everson) ensures that risk assessments are appropriately completed, monitored and reviewed.

Leaders are responsible for ensuring that Ofsted and DofE expectations relating to safeguarding, welfare, behaviour and mental health are met consistently and can be demonstrated during inspection.

Commitment to Pupil Welfare

Trust-Education Group Ltd recognises its duty to safeguard every pupil and promote their welfare, health, emotional wellbeing, and personal development. The Trust adopts a trauma-aware and relational ethos in line with best practice for SEMH provision, ensuring that pupils feel safe, understood and supported.

Trust Education group identifies pupils who may require Early Help, targeted mental health support, therapeutic intervention or specialist agency involvement. Staff maintain professional curiosity, understand signs of distress, and use relational de-escalation approaches to maintain safety.

Pupils are protected from abuse, neglect, exploitation, bullying, harassment, unsafe online behaviour, harmful peer influence and contextual risks. Pupils are supported to understand how to keep themselves safe, in accordance with statutory guidance including KCSIE, Prevent Duty guidance and RSE/PSHE requirements.

The school ensures that pupils' voices are heard. Pupils have access to their own 'Pupil Voice Governor' - Julie Foster. Should they need to raise concerns. Staff recognise that SEMH pupils may struggle to articulate concerns, and therefore subtle cues of distress or dysregulation must be noted and acted upon.

Risk assessments must consider a pupil's emotional needs, identity, protected characteristics, history, family circumstances, triggers, online behaviour, associations, mental health profile and contextual environment.

Risk Assessment

A welfare risk assessment is required whenever there is concern about a pupil's welfare, behaviour, mental health, safety, attendance or vulnerability. Staff use Trust education groups standard risk assessment proforma to ensure consistent practice.

All pupils have an individual risk assessment completed during their induction. This forms a baseline profile of their needs, strengths, risks, vulnerabilities, SEMH presentation, behavioural indicators, safeguarding history and protective factors. The induction assessment is reviewed regularly as the pupil settles into school.

Risk assessments are proactive and preventative, ensuring foreseeable risks are managed before harm occurs. They are designed to support safe access to education and are not used to restrict participation unless absolutely necessary.

Risk assessments may be linked to wider plans such as behaviour support plans, mental health plans, safety plans, therapeutic plans or EHCPs. Risk assessments must be updated after incidents, new information, changes in presentation or advice from external professionals.

The policy meets Ofsted expectations that pupils are safe in education because leaders identify risks accurately and respond swiftly.

The Risk Assessment Process

Risk assessment begins with identifying concerns and understanding how harm could occur. Staff consider patterns, incident history, clinical or agency information, triggers, stressors, environmental factors and contextual risks.

Staff identify who may be affected, including the pupil, peers, staff, visitors or the community. Trust education group use a rag rated risk assessment to determine the level of risk and the reasonable, proportionate measures required to reduce it.

Pupils, Parents and professionals may contribute to the assessment where appropriate. The DSL (Katie Everson) provides oversight of significant risk assessments and ensures that control measures are implemented.

Risk assessments must be recorded clearly, with actions monitored and reviewed regularly. Assessments are dynamic and updated promptly when presentation changes. The school ensures consistent, cross-staff understanding of risk and strategies, supporting coherent and safe practice.

This process meets DofE expectations for specialist SEMH provision, where risk is understood, recorded and actively managed.

Reporting and Information Sharing

Staff must consider whether a concern meets thresholds for referral to external agencies including Children's Social Care, Police, Prevent, CAMHS, Early Help and Youth Services. All concerns follow the Safeguarding and Child Protection Policy.

Information sharing is essential for safeguarding. Staff follow statutory guidance on information sharing and understand that fears about sharing information must not prevent necessary action to protect a child.

The DSL (Katie Everson) oversees communication with agencies and ensures coordinated support. Where a pupil is questioned by the police, the DSL ensures that an appropriate adult is present.

The school meets statutory requirements for notifying the Local Authority of Children Missing Education and pupils removed from roll.

Record Keeping

All risk assessment records are securely stored, accurately maintained and handled in accordance with UK GDPR and the Data Protection Act 2018.

The Designated Safeguarding Lead (Katie Everson) and SLT review records to identify patterns, evaluate interventions and monitor safeguarding effectiveness. Records are retained for the appropriate period and available for inspection.

Publication, Availability and Feedback

This policy is published on the Trust-Education Group Ltd website and available in alternative accessible formats upon request. A hard copy is available from the school office.

The Trust welcomes feedback on how the policy may be improved as part of its commitment to continuous safeguarding development.

Related Legislation

This policy is informed by:

• Children Act 1989
• Children Act 2004
• Children and Families Act 2014
• Education (Independent School Standards) Regulations 2014
• Education Act 2002
• Education and Skills Act 2008
• Equality Act 2010
• Public Sector Equality Duty
• Data Protection Act 2018
• UK GDPR
• Health and Safety at Work etc. Act 1974
• Regulatory Reform (Fire Safety) Order 2005
• Safeguarding Vulnerable Groups Act 2006
• Counter-Terrorism and Security Act 2015
• Prevent Duty guidance
• Channel Duty guidance
• Working Together to Safeguard Children 2024

• Keeping Children Safe in Education 2025
• Relevant DfE guidance on attendance, mental health, behaviour, online safety, RSE and information sharing

Other Relevant Policies

This policy should be read alongside the following:

• Safeguarding and Child Protection Policy
• SEMH Behaviour Regulation Policy
• Anti-Bullying and Child-on-Child Abuse Policy
• Online Safety Policy
• Health and Safety Policy
• Educational Visits Policy
• Attendance Policy
• Data Protection Policy
• Whistleblowing Policy

Checklist of Pupil Welfare Risk Factors

Risk factors may include, but are not limited to, the following. These reflect the wide range of emotional, behavioural, social, contextual and environmental vulnerabilities that pupils in SEMH settings may experience. Staff must consider how multiple overlapping factors can increase overall risk, and how protective factors can mitigate vulnerability.

• Emotional dysregulation including difficulty managing strong emotions, rapid mood escalation, low frustration tolerance or inability to self-soothe.
• Self-harm including cutting, scratching, burning, head-banging, ligature risks, risk-taking behaviours or withholding essential needs.
• Suicidal ideation including verbal statements, written expressions, disclosed thoughts, online activity, indirect references, or patterns of hopelessness.
• Aggression including verbal aggression, threats, intimidation, and physically aggressive responses triggered by stress, fear, confusion or perceived threat.
• Violence including acts towards peers, staff or property, or escalating patterns of conflict and retaliation.
• Property damage including breaking objects, throwing items, vandalism or

behaviour linked to sensory overload or emotional crisis.

• Heightened sensory responses including over- or under-sensitivity to sound, light, touch, crowds or proximity, leading to distress or dysregulated behaviour.

• Trauma triggers including sounds, smells, words, environments, relationships or transitions that activate past traumatic memories or responses.

• Dissociation including zoning out, detachment, memory gaps, withdrawal, or appearing unresponsive during emotional distress.

• Sexualised behaviour including inappropriate language, boundary-testing, exposure to harmful online content, or behaviour influenced by exploitation or trauma.

• Exploitation vulnerability including grooming for criminal, sexual or financial exploitation, susceptibility to peer pressure or older influence.

• County lines risk including unexplained money or items, association with older peers, secrecy, absences, or known community risks.

• Absconding including leaving class or site without permission, attempts to run away, or patterns associated with crisis, fear or dysregulation.

• Substance misuse including alcohol, vaping, illegal drugs, prescription medication misuse or influence by peers involved in substance use.

• Mental health deterioration including anxiety, depression, panic attacks, withdrawn behaviour, sleep disruption, eating difficulties or changes in presentation.

• Bereavement including grief responses, emotional shutdown or behavioural changes following the loss of a loved one or significant person.

• Family instability including domestic abuse, separation, parental mental health issues, financial difficulties, homelessness or caring responsibilities.

• Neurodiversity including difficulties related to ADHD, Autism, sensory processing differences, executive functioning challenges or communication barriers.

• Peer influence including involvement with risky peer groups, coercion, bullying dynamics or attempts to impress or align with others.

• Online behaviour including exposure to harmful content, unsafe digital communication, cyberbullying, radicalisation risk or online grooming.

• Identity-based vulnerability including challenges relating to race, ethnicity, gender identity, LGBTQ+ identity, disability, culture or faith.

• Contextual threats including community violence, gang presence, local criminal activity, exploitation networks or unsafe home neighbourhoods.

• Protective factors including trusted adult relationships, stable routines, positive self-image, communication skills, resilience competencies, supportive family involvement and access to therapeutic support.

Risk Assessment Template

Location / Work Area	Activity / Task	Completed By.
Date of assessment	**Review Date**	**Checked by…**

Risk Rating Scoring – 5 x 5 Matrix	
Levels of Risk Consequence Likelihood No impact (1) Minor (2) Medium (3) Major (4) Extensive Very Unlikely (1) 1 = L 2 = L 3 = L 4 = L 5 = L Unlikely (2) 2 = L 4 = L 6 = M 8 = M 10 = M Fairly Likel (3) 3 = L 6 = M 9= M 12 = H 15 = H Likely (4) 4 = L 8 = M 12 = H 16 = VH 20 = VH Very Likely (5) 5 = L 10 = M 15 = H 20 = VH 25 = VH	Residual Risk Level of Approval/ Notification Required 1 – 5 = L No approval required to proceed. 6 – 10 = M Line manager must review and reduce residual risk where possible. Line manager must approve final risk assessment before activity proceeds. 11 – 15 = H As above and the headteacher must approve prior to activity commencing. 16 - 25 = VH As above and the governing board must be informed of the residual risk and decide on action to take.
Risk Rating = Likelihood score X Consequence score - If the score is low due to existing control measures already in place, then these must be maintained to sustain high standards	

Hazard Description	Who may be harmed and how?	Current Control Methods	Likelihood
Road Crossing and Vehicle Traffic	Pupils, staff, volunteers	Pupils briefed before leaving school on road safety and expected behaviour Designated crossing points used where available (e.g. pelican/zebra crossings) Sufficient adult supervision with staff positioned at the front, middle and rear of the group High-visibility vests worn by pupils where appropriate	

Consequence	Risk rating	Additional Control Methods required	Revised Likelihood	Revised Consequence	Revised Risk Rating
		Ensure all supervising adults are aware of their roles Carry out dynamic risk assessment on the day depending on traffic and weather conditions Staff trained in group management during off-site visits			

Risk Assessor: _____
Signature_____ Date_____

Head of School:
_____Signature_____
__ Date_____

(Governing Board – If applicable) _____
Signature_____ Date_____

Policy Lead	Melissa Wainman Director of Education
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Approval:	Trust-Education Group Board of Governor