Regular Activity Risk Assessment (RARA) andIndividual Pupil Risk Assessment Policy

Related documents: Health & Safety Policy; Health, Safety & Educational Activities Framework; Behaviour Policy; Safeguarding and Child Protection Policy; First Aid Policy; Positive Behaviour and Physical Intervention Policy; Educational Visits Policy

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OUR VISION

Our vision is to provide pupils with the confidence, skills and ambition to achieve a successful and productive life. We aim to ensure they leave the school with a 'new day, new opportunity' ethos and are capable of becoming positive members of their communities. To do this, we have 3 principles that underpin our policies, practices and everything we do:

Everyone can learn, achieve and has the potential to be successful

Positive relationships are key to success and are underpinned by mutual trust, respect and caring for one another

Policy owner	White Trees School	Last review	September 2026
Date Created	September 2026	Next review	September 2027

Legislation and Statutory Guidance

This policy has been drawn up with regard to the following legislation and guidance. It sets out how White Trees School plans, assesses and manages risk for regular educational activities and for individual pupils. It is written to meet the requirements of the Education (Independent School Standards) Regulations 2014, Schedule Part 3:

- **Paragraph 16:** the standard is met if the proprietor ensures that the welfare of pupils is safeguarded and promoted through a written risk assessment policy, and that appropriate action is taken to reduce identified risks. This policy, together with our Health & Safety Policy, sets out our risk assessment arrangements and should be read as satisfying this standard alongside completed Regular Activity Risk Assessments (RARAs) and Individual Pupil Risk Assessments.
- **Paragraph 11:** the standard is met if the proprietor ensures that relevant health and safety laws are complied with by drawing up and effectively implementing a written health and safety policy.

This policy also has regard to:

- The Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Keeping Children Safe in Education (DfE, statutory guidance, current edition)
- Working Together to Safeguard Children (DfE)
- Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2019)
- The SEND Code of Practice: 0 to 25 years (DfE/DoH, 2015)
- The Equality Act 2010
- The Regulatory Reform (Fire Safety) Order 2005, where relevant to activity venues
- The Adventure Activities Licensing Regulations 2004, where external providers deliver licensable activities
- The Department for Education's guidance, Health and safety: responsibilities and duties for schools, updated April 2022

This policy should be read alongside our Health & Safety Policy, Health, Safety & Educational Activities Framework, Behaviour Policy, Safeguarding and Child Protection Policy, First Aid Policy, Positive Behaviour and Physical Intervention Policy and Educational Visits Policy.

Introduction and Purpose

WhiteTrees Independent School is a specialist provision for children and young people with Special Educational Needs and Disabilities (SEND), Social, Emotional and Mental Health (SEMH) needs and additional vulnerabilities. Our approach to risk management is founded on the principle of "safe participation rather than risk avoidance": pupils should not be prevented from accessing valuable educational opportunities because of unnecessary risk aversion, and staff are expected to

understand foreseeable risks, implement proportionate control measures, and support pupils to participate safely.

Two documents work together to achieve this for every activity we deliver:

- **Regular Activity Risk Assessments (RARAs),** which assess the foreseeable hazards created by an activity itself, for everyone taking part; and
- **Individual Pupil Risk Assessments (IPRAs),** which assess the specific risks presented by a named pupil's medical needs, behaviour, emotional regulation, communication needs, disability or other vulnerability.

This policy sets out when each document is required, what it must contain, who is responsible for producing, approving and reviewing it, and how the two are used together. It does not replace an individual RARA or IPRA, and it does not by itself make any activity safe — that depends on competent staff who apply this policy with sound professional judgement.

Purpose

This policy seeks to:

- establish a consistent standard for risk assessment across all WhiteTrees sites;
- ensure all foreseeable hazards created by an activity are identified and controlled before it commences;
- ensure the specific risks presented by an individual pupil are properly assessed, understood by staff and reviewed regularly;
- prevent the common error of confusing activity risk with individual pupil risk, so that neither document is used to do the job of the other;
- promote positive risk-taking, enabling pupils to develop confidence, independence and resilience within clear and proportionate safeguards;
- ensure compliance with the Independent School Standards, relevant health and safety legislation and Department for Education guidance; and
- provide a clear framework for approval, quality assurance and review, so that leaders can be confident that every activity is safe for everyone involved.

Scope

This policy applies to all three WhiteTrees sites, to every member of staff, volunteer and visitor who plans, delivers or supervises an educational activity, and to every pupil on roll. It applies on site, off site, in the community and during transport, and to activities delivered as part of the curriculum, enrichment, vocational learning or day-to-day school life.

What is a RARA, and What is an Individual Pupil Risk Assessment?

One of the most common errors in risk assessment is confusing the risks associated with an activity with the risks associated with an individual pupil. Although the two documents complement one another and should be read together, they serve very different purposes and must never replace each other.

Regular Activity Risk Assessment (RARA)	Individual Pupil Risk Assessment (IPRA)
Assesses the activity	Assesses the individual pupil
Applies to everyone participating	Applies only to one named pupil
Looks at hazards created by the activity	Looks at risks arising from the pupil's individual needs
A well-written RARA should enable any competent member of staff to safely deliver the activity	A well-written IPRA should enable any competent member of staff to safely support that specific pupil
Completed once for the activity; applies at every site where it is delivered	Completed for each pupil where required, and follows the pupil
Reviewed at least annually, or after a significant incident, near miss, venue change, equipment change or change in the pupil group	Reviewed at least termly, or whenever needs change or after an incident

The White Trees Principle

Regular Activity Risk Assessments assess the activity. Individual Pupil Risk Assessments assess the pupil. Both documents should be read together where appropriate, but neither replaces the other.

It can help to think of the RARA as the "stage" and the Individual Pupil Risk Assessment as the "actor". The stage- the activity -must be made safe for everyone before anyone steps onto it. The actor - the individual pupil - may then need additional support, adjustments or controls in order to participate safely.

The Golden Rule

If you remove the pupil's name and the risk still exists, it belongs in the RARA.

If you remove the pupil's name and the risk disappears, it belongs in the Individual Pupil Risk Assessment.

Our Risk Assessment Principles

At WhiteTrees Independent School we will:

- place the safety and welfare of pupils at the centre of every decision;
- promote positive risk-taking where the educational benefit outweighs the foreseeable risk;
- ensure all foreseeable hazards are identified, for the activity and for the individual, before an activity commences;

- implement proportionate and effective control measures, written specifically enough that any competent member of staff could follow them;
- keep RARAs and Individual Pupil Risk Assessments as distinct, complementary documents, and never allow one to substitute for the other;
- promote dynamic risk assessment throughout every activity, not just at the planning stage;
- learn from accidents, incidents and near misses, treating repeated minor events as a warning that controls may be insufficient;
- monitor compliance and quality through a robust quality assurance process; and
- continuously improve our risk assessment practice through reflection, training and leadership.

Roles and Responsibilities

The Leadership Team

- Ensuring that every regular educational activity is supported by an appropriate, proportionate and approved RARA, and that every pupil whose needs require it has an Individual Pupil Risk Assessment.
- Providing the resources, training and quality assurance arrangements staff need to plan, deliver and review activities safely.
- Monitoring and reviewing this policy and ensuring necessary revisions are made.

Executive Headteacher, Headteacher and Deputies

- Before an activity begins, ensuring: the educational purpose is clear; the activity suits the age, ability and needs of participating pupils; the venue has been inspected; all foreseeable hazards have been identified; control measures are in place; staffing is sufficient; staff understand their roles; medical information has been reviewed; emergency arrangements are understood; and any required permissions have been obtained.
- During an activity, the member of staff leading it must maintain continuous oversight, continually undertake dynamic risk assessment, monitor pupils for changes in behaviour, fatigue or distress, keep staff appropriately positioned, intervene early when risk increases, and suspend or modify the activity where necessary.
- Following an activity, checking the welfare of all participants, recording any accidents, incidents or near misses, evaluating whether controls were effective, identifying lessons learned, and ensuring RARAs and Individual Pupil Risk Assessments are amended where improvements are identified.
- Carrying out the quality assurance checks set out later in this policy before approving a RARA or Individual Pupil Risk Assessment.

Activity Leaders and All Staff

- Reading the relevant RARA, and any Individual Pupil Risk Assessment, Positive Behaviour Support Plan, Medical Care Plan, Healthcare Plan or EHCP for pupils attending, before every activity.
- Applying the control measures in full, and exercising professional judgement and dynamic risk assessment throughout delivery.
- Reporting hazards, near misses and concerns promptly, and never allowing an activity to proceed where staffing, equipment or conditions are unsafe.
- Being good role models: vigilant, careful, and confident to pause, adapt or stop an activity when required.

Designated Safeguarding Lead (DSL)

- Holding, reviewing and coordinating Harmful Sexual Behaviour (HSB) risk management plans, and ensuring these are shared on a strictly need-to-know basis.
- Advising Deputies and Activity Leaders where an Individual Pupil Risk Assessment raises a safeguarding concern.

Pupils

- Taking an active part in understanding the plan for an activity, expressing any concerns, and raising issues through Pupil Voice meetings or with a trusted adult.

Parents/Carers

- Providing full and up-to-date information about their child's medical needs, behaviour and any relevant home circumstances, so that Individual Pupil Risk Assessments remain accurate.
- Engaging with reviews of their child's Individual Pupil Risk Assessment, and with HSB risk management planning meetings where these are required.

Regular Activity Risk Assessments (RARA)

A Regular Activity Risk Assessment identifies the foreseeable hazards that exist within a particular activity and explains the measures staff must take to reduce those risks for everyone participating. The focus is the activity itself, regardless of who is taking part, and the controls within a RARA apply to all participants.

When a RARA is Required

A RARA is required for any activity that is delivered on a regular or repeated basis. In line with our Health & Safety Policy, we use a tiered approach to risk assessment:

Tier	Description	Example activities
Tier 1	A regular activity, risk assessed each full term. Permission is acknowledged in the parent/carer pack.	Football, basketball, cooking, gardening, gym sessions, science practicals, use of libraries

Tier	Description	Example activities
Tier 2	A one-off trip that is organised but low or moderate risk. A risk assessment is created for each trip. Permission is acknowledged in the parent/carer pack.	Trips to the cinema, for lunch, or to a museum
Tier 3	A trip carrying moderate risk and/or additional considerations. Specific written permission is required for each trip or block booking.	Theme parks, paintballing, go-karting, residential trips, blocks of swimming lessons

Other activities that typically require a RARA include, but are not limited to: Forest School, community visits, public transport, swimming, beach visits, construction activities, horse riding, Duke of Edinburgh's Award activities and animal care.

Minimum Content of a RARA

Every RARA must, at minimum, set out:

- **Activity scope and educational purpose:** what the activity involves, the educational and developmental benefit it provides, and where and how it may be delivered.
- **Header details:** activity, applies to (sites/venues), who completed and approved it, review date, typical participants, frequency, linked documents and emergency equipment.
- **Minimum operating requirements:** the competence and knowledge required of the Activity Leader, minimum staffing levels, and the first aid and emergency equipment that must be available before the activity begins.
- **Risk rating method:** see below.
- **Mandatory pre-activity checks:** the checks staff must complete every time before the activity starts (venue, equipment, weather, staffing, individual pupil information, and so on).
- **A detailed hazard assessment table** recording, for each foreseeable hazard: who may be harmed and the possible harm; the initial risk rating; the planned control measures staff must apply before and during delivery; the dynamic actions, stop criteria and emergency response if circumstances change; and the resulting residual risk rating.
- **Non-negotiable stop criteria:** the specific circumstances in which the activity must be paused, adapted or stopped.
- **Post-activity actions:** accounting for pupils, checking for injury or delayed symptoms, completing records, and reviewing whether controls worked.

Risk Rating Method

Risk rating is calculated as Likelihood (1–5) × Severity (1–5). Initial risk is assessed before controls are applied; residual risk is assessed after all stated controls are implemented. Any residual score of 10 or above requires senior-leader review before the activity may proceed.

1–3 Low	4–6 Moderate	8–12 High	15–25 Very High
Proceed with controls and routine monitoring.	Proceed only when controls are clearly implemented and monitored.	Further controls and manager oversight required before proceeding.	Do not proceed until risk is reduced and senior approval is obtained.

Writing a Good RARA

A good RARA should allow the reader to answer each of the following questions:

- What are we doing?
- What could reasonably go wrong?
- Who could be harmed?
- How serious could the harm be?
- What have we done to reduce the risk?
- What must staff do during the activity?
- When would we stop or change the activity?
- How will we know if our controls were effective?

If these questions cannot be answered by reading the document, it requires further development. A well-written RARA should enable any competent member of staff who did not write it to safely lead the activity.

Approval and Review

- RARAs are completed by the Deputy Headteacher or delegated Activity Leader, and must be approved by the Headteacher or a designated senior leader before an activity is first delivered.
- RARAs are reviewed at least annually, and immediately after any significant incident, repeated near miss, venue change, equipment change or change in the pupil group. The version and review date must be updated and changes communicated to all relevant staff.
- A worked, approved example -**Regular Activity Risk Assessment: Football** - is held in the school's risk assessment library as the benchmark for the level of detail and specificity expected of every RARA.

Individual Pupil Risk Assessments (IPRA)

An Individual Pupil Risk Assessment identifies the specific risks presented by a named pupil arising from their medical needs, behaviour, emotional regulation, communication needs, disability or other vulnerability. The focus is the individual, not the activity, and a well-written IPRA should enable any competent member of staff to safely support that specific pupil.

When an IPRA is Required

An IPRA must be completed wherever a pupil's individual needs create a foreseeable risk that a generic RARA cannot address. Examples include, but are not limited to:

- absconding; physical aggression; self-harm; suicidal ideation;
- autism-related sensory overload; ADHD and impulsivity;
- epilepsy, diabetes, severe allergies or other medical conditions;
- dysregulated behaviour or trauma responses;
- communication difficulties; PICA; eating disorders; mobility difficulties; and
- any identified risk of harmful sexualised behaviour (see the following section).

Minimum Content of an IPRA

Every Individual Pupil Risk Assessment must, at minimum, set out:

- **A pupil overview:** a holistic profile including relevant diagnosed needs, how the pupil best communicates and engages, information that helps staff build a trusted relationship, specific interests that can be used positively to support engagement, and any specific activities that present a heightened risk for that pupil.
- **A degree-of-risk key** (High / Medium / Low) applied consistently throughout the document.
- **Presenting difficulties and preventative/support measures,** set out by domain, for example Social, Emotional and Mental Health; Communication and Interaction; Attention, Impulsivity and Regulation; Emotional Regulation; and Sensory and Physical needs, with each presenting difficulty matched to a specific, practical support measure.
- **An individual risk table** identifying each specific risk, details of that risk, and the steps taken to reduce it, structured across prevention, early response, during escalation and after the event, together with a likelihood, impact and overall rating.
- **A staged staff response guide** where relevant, for example regulated/ready, early signs of dysregulation, escalating, crisis/immediate risk, recovery, and repair and review, describing for each stage what staff may observe, the primary aim, what staff should do, what staff should avoid, and escalation and recording requirements.
- **Non-negotiable staff principles** governing how staff respond to the pupil, including that one adult leads communication during dysregulation, that behaviour is treated as communication, that safety takes priority over task completion, and that physical intervention is a last resort used only by trained staff for the shortest time necessary.
- **A dated review log** recording each review, who carried it out, whether anything changed, and the date of the next review.

Behaviour Wave and Provision

Where relevant, the school uses "Behaviour Wave" descriptors to match a pupil's timetable, staffing ratios and curriculum access to their current level of need. This is

reviewed alongside the Individual Pupil Risk Assessment so that the level of support offered reflects the pupil's presentation, not just their diagnosis.

Compiling, Holding and Reviewing an IPRA

- IPRAs are compiled by a named member of staff who knows the pupil well (typically a Deputy or key worker), drawing on information from parents/carers and other professionals involved in the pupil's care.
- IPRAs are held on the pupil's file and shared with all staff who work with the pupil; information is shared on a need-to-know basis in line with our Safeguarding and Child Protection Policy.
- IPRAs are reviewed at least termly, and immediately following a significant incident, a new diagnosis, a change in presentation, or where existing controls are no longer effective.
- A worked example, the school's **Individual Pupil Risk Assessment template**, is held by Head Office and available to all staff as the benchmark for quality and detail.

Harmful Sexual Behaviour (HSB) Risk Management Plans

Where an Individual Pupil Risk Assessment identifies a current or previous risk of harmful sexualised behaviour, it must be supplemented by a specific HSB risk management plan. This is a specialist addendum, not a replacement for the wider IPRA, and is treated as a safeguarding document at all times.

- An HSB risk management plan must be completed following a meeting involving all professionals working with the child or young person, and their parents/carers wherever appropriate.
- It must record: the specific concerns and the evidence for them; who could be harmed and how, including any specific concerns about age groups, gender or vulnerable peers; known triggers and the strategies used to reduce or manage them; risky locations and the strategies used to minimise risk there; risky activities, including use of technology, and the strategies used to minimise risk; transport arrangements and associated risks; the pupil's strengths; any individual work or external referrals; the views of other agencies involved; and how the level of risk will be reviewed.
- It must be read alongside the Brook Traffic Light Tool, Keeping Children Safe in Education, and Sexual violence and sexual harassment between children in schools and colleges (DfE).
- It is held and coordinated by the Designated Safeguarding Lead, shared strictly on a need-to-know basis, and reviewed regularly and whenever the level of risk changes.

Using RARAs and Individual Pupil Risk Assessments Together

In practice, both documents must be used together. Before any activity, staff should read the relevant RARA for the activity, plus any Individual Pupil Risk Assessment, Positive Behaviour Support Plan, Medical Care Plan, Healthcare Plan or EHCP for the pupils attending. This ensures the activity is safe for everyone while also

addressing any additional support required by individual pupils. Every activity still requires a RARA, even where all attending pupils have their own Individual Risk Assessments.

Common Mistakes

Mistake	Instead
Listing pupil names, or a pupil's behaviour, as a hazard within a RARA.	Keep the RARA activity-focused, and reference the relevant Individual Pupil Risk Assessment where necessary.
Writing vague controls such as "staff supervise".	Explain exactly how staff will supervise, where they will position themselves, and what actions they will take.
Copying an individual pupil's behaviour strategies into every RARA.	Refer to the pupil's Individual Pupil Risk Assessment or Positive Behaviour Support Plan.
Using only one of the two documents.	Every activity still requires a RARA, even where pupils have their own Individual Pupil Risk Assessments.

For example, within a football RARA, "John becomes aggressive" is not a risk created by football, it is a risk associated with an individual pupil's behaviour and belongs in that pupil's Individual Pupil Risk Assessment. The correct RARA entry instead records the foreseeable hazard that competitive team sport may increase the likelihood of verbal disagreement, physical contact or conflict between participants generally, together with the generic controls staff should apply to manage this for the whole group.

Dynamic Risk Assessment

No written RARA or Individual Pupil Risk Assessment replaces active supervision or professional judgement. All staff must continually apply the following model throughout every activity:

- **Scan –** observe the environment, pupils, equipment and weather.
- **Think –** ask whether anything has changed, whether anyone is at greater risk, and whether the activity is still safe.
- **Act –** introduce additional controls, modify the activity, increase supervision, or stop the activity if necessary.
- **Review –** after the activity, consider whether the controls worked, whether there were any near misses, and whether the RARA or Individual Pupil Risk Assessment needs updating.

The Activity Planning Cycle

This ten-step cycle applies to every educational activity, whether delivered on site, off site or within the local community:

- 1. Educational purpose – define the aim of the activity and its learning outcomes.
- 2. Identify hazards – consider the activity, location, people, equipment and external factors.
- 3. Assess the risks – evaluate likelihood and severity using professional judgement.
- 4. Implement control measures – apply the hierarchy of controls to reduce risk to an acceptable level.
- 5. Brief staff – share the RARA, allocate roles, confirm supervision, ratios, first aid and emergency procedures.
- 6. Brief pupils – explain the activity, rules, expectations and safety boundaries in an age-appropriate way.
- 7. Deliver the activity – supervise actively and ensure all controls are in place and working.
- 8. Dynamic risk assessment – continuously monitor and adapt throughout delivery.
- 9. Review and record – record incidents and near misses, evaluate the activity and note lessons learned.
- 10. Improve and plan next time – update documents, share learning with staff, and continue the cycle.

This cycle is underpinned by five key principles: pupils first; positive risk-taking (we enable learning by managing risk, not avoiding it); proportionate controls that match the level of risk and benefit; everyone's responsibility for keeping each other safe; and continuous improvement.

Quality Assurance and Approval

Before approving a RARA, the reviewing Deputy or senior leader should ask:

- Is the educational purpose clearly stated?
- Are all foreseeable hazards identified, for the activity and, where relevant, for individual pupils via cross-reference?
- Have the control measures been written specifically enough that any competent member of staff could follow them?
- Does the assessment distinguish between activity risks and individual pupil risks?
- Are dynamic risk assessment expectations, emergency procedures and responsibilities clear?
- Are review arrangements documented, and is the document current and relevant to the activity?
- Could a competent member of staff who did not write the document safely lead the activity, or safely support the named pupil, using this document alone?

- Have relevant individual plans been checked and linked, without copying all pupil-specific content into the activity RARA?

Deputy self-assessment

If I was unexpectedly absent tomorrow, could another competent member of staff safely deliver this activity, or safely support this pupil, using only this document? If the answer is no, further detail is required.

Before approving or leading any educational activity, every Deputy should also ask themselves:

- Have I identified all reasonably foreseeable hazards associated with this activity?
- Would another competent member of staff understand exactly how to deliver this activity safely using my risk assessment?
- Have I considered whether any participating pupils require additional support through their Individual Risk Assessment, Medical Care Plan or Positive Behaviour Support Plan?
- Am I confident that staff know what actions to take if circumstances change or risks increase during the activity?
- If this activity were reviewed by a parent, a Governor, Ofsted or the Health and Safety Executive, would I be confident it demonstrates the high standards expected of White Trees Independent School?

If the answer to any of these questions is no, further planning or review is required before the activity proceeds.

Recording, Reporting and Learning from Incidents

Accidents, injuries, near misses, unsafe equipment and significant behavioural incidents must be recorded in the correct system (including CPOMS, as applicable) on the same day, in line with our Health & Safety Policy. The Deputy investigating an incident should identify whether it arose from the environment, equipment, staffing, instruction, group composition or individual pupil factors, and record this against the relevant RARA and/or Individual Pupil Risk Assessment.

- A significant incident, repeated near miss, venue change, equipment change or change in the pupil group triggers immediate review of the relevant RARA and/or Individual Pupil Risk Assessment, not just the scheduled annual or termly review.
- Site leaders review trends, not only serious injuries; repeated minor events are treated as a warning that controls may be insufficient.
- Changes are communicated to all relevant staff and the document's version and review date are updated.
- Serious incidents are escalated for RIDDOR and statutory reporting consideration, and for governance oversight, in line with our Health & Safety Policy.

Training

- All staff receive induction and refresher training in risk assessment, tailored to their specific role and area of work, in line with our Health & Safety Policy.
- Staff who lead activities receive training in dynamic risk assessment and in completing and reviewing RARAs.
- Staff who may use physical intervention receive training in line with our Positive Behaviour and Physical Intervention Policy before supporting a pupil whose Individual Pupil Risk Assessment identifies this as a possible need.
- The Designated Safeguarding Lead and relevant staff receive specific training in harmful sexual behaviour risk management.
- Head Office is responsible for keeping records of all staff training.

Monitoring and Review of this Policy

This policy is reviewed annually by the Executive Headteacher, or sooner following a significant incident, a change in legislation or statutory guidance, or as directed by the Governance group. It is monitored alongside our Health & Safety Policy and Health, Safety & Educational Activities Framework as part of the school's wider health and safety management system.

White Trees Health, Safety and Risk Assessment Pledge

At White Trees School, health and safety is not about preventing opportunities, it is about creating them safely.

Every activity should be carefully planned. Every foreseeable risk, to the group and to the individual, should be thoughtfully managed. Every member of staff should understand their role. Every pupil should feel safe enough to participate, learn and succeed.