

# Three Towers

An Alternative Provision Academy

*Expanding Horizons*

## **Risk Assessment Policy & Procedures 2024 - 2025**

Adopted: September 2024

Review: At least annually

## 1 Introduction

Managers are required to manage health and safety in the workplace and plan it into their daily routines. In order to manage health and safety, employers are required to carry out risk assessments and record the significant findings. This involves identifying and assessing workplace hazards faced by employees, contractors, volunteers, visitors and members of the public and putting in place suitable arrangements to control these risks. Details of these arrangements and any training that is needed will need to be provided to all those who may be affected.

When considering what activities take place and who may be affected, managers need to consider:

- all routine and non-routine activities (e.g. maintenance operations, loading and unloading)
- all workplaces and groups of staff, including lone workers, cleaners, night staff, staff with disabilities, contractors, agency staff, visitors, learners, volunteers, members of the public and services users. It may also include new and expectant mothers.

As Three Towers (TTAPA) shares a workplace with another employer, managers must co-operate with them and co-ordinate the management of health and safety. Managers need to inform the other party of any risks to their health and safety arising from their work. This will enable both parties to meet their legal responsibilities.

Employees and others who may be affected have a responsibility to take reasonable care of their own safety and that of other people and must therefore use equipment and apply safe ways of working in accordance with the instruction and training they have received.

## 2 Aims

Three Towers (TTAPA) will endeavour to ensure that:

- all risks that may cause injury or harm to staff, learners and visitors are identified;
- all control measures that are reasonably practicable are in place to avoid injury or harm;
- risk assessments are conducted and reviewed on a regular basis.

## 3 Legislation and statutory requirements

This policy is based on the following legislation and Department for Education (DfE) guidance:

- Paragraph 16 of part 3 of [The Education \(Independent School Standards\) Regulations 2014](#), which requires proprietors to have a written risk assessment
- Regulations 3 and 16 of [The Management of Health and Safety at Work Regulations 1999](#) require employers to assess risks to the health and safety of their employees, including new and expectant mothers
- Regulation 4 of [The Control of Asbestos Regulations 2012](#) requires employers carry out an asbestos risk assessment
- Employers must assess the risk to workers from substances hazardous to health under regulation 6 of [The Control of Substances Hazardous to Health Regulations 2002](#)

- Under regulation 2 of [The Health and Safety \(Display Screen Equipment\) Regulations 1992](#), employers must assess the health and safety risks that display screen equipment pose to staff
- Regulation 9 of [The Regulatory Reform \(Fire Safety\) Order 2005](#) says fire risks must be assessed
- Regulation 4 of [The Manual Handling Operations Regulations 1992](#) requires employers to conduct a risk assessment for manual handling operations
- [The Work at Height Regulations 2005](#) say employers must conduct a risk assessment to help them identify the measures needed to ensure that work at height is carried out safely
- [DfE guidance on first aid in schools](#) says schools must carry out a risk assessment to determine what first aid provision is needed
- [DfE guidance on the Prevent duty](#) states schools are expected to assess the risk of pupils being drawn into terrorism
- [The Health and Safety Executive \(HSE\)](#) say schools that manage their own pools must conduct a risk assessment
- DfE guidance on [health and safety: responsibilities and duties for schools](#) says schools must identify the measures needed to reduce the risks from public health incidents, including COVID-19, so far as is reasonably practicable

A table of all the risk assessments schools are required to have in place can be found in appendix 1 of this policy.

This policy complies with our funding agreement and articles of association.

## 4 Definitions

**Risk assessment** – a tool for examining the hazards linked to a particular activity or situation, and establishing whether enough precautions have been taken in order to prevent harm from them based on their likelihood and their potential to cause harm

**Hazard** – anything with the potential to cause harm.

**Risk** – the chance (high, medium or low) that somebody will be harmed by the hazard, together with an indication of how serious the harm could be

**Control measure** – action taken to prevent people being harmed.

## 5 Roles & Responsibilities

### 5.1 The Rowan Learning Trust (RLT) & Local Governing Committee (LGC)

The Rowan Learning Trust has ultimate responsibility for health and safety matters in the school, but will delegate day-to-day responsibility to the Headteacher.

The LGC has a duty to take reasonable steps to ensure that staff and learners are not exposed to risks to their health and safety. This applies to activities on or off the school premises.

The RLT as the employer, also has a duty to:

- assess the risks to staff and others affected by school activities in order to identify and introduce the health and safety measures necessary to manage the risks;
- inform employees about risks and the measures in place to manage them.

## 5.2 The headteacher

The headteacher, or in the headteacher's absence the Director of Operations is responsible for ensuring that all risk assessments are completed and reviewed.

## 5.3 School staff and volunteers

School staff are responsible for:

- assisting with, and participating in, risk assessment processes, as required;
- familiarising themselves with risk assessments;
- implementing control measures identified in risk assessments;
- alerting the headteacher to any risks they find that need assessing.

## 5.4 Learners and parents/carers

Learners and parents/carers are responsible for following the school's advice in relation to risks, on-site and off-site, and for reporting any hazards to a member of staff.

## 5.5 Contractors

Contractors are expected to provide evidence that they have adequately risk assessed all their planned work.

# 6 Risk Assessment Process

## 6.1 When should I carry out a risk assessment?

Where no previous risk assessment has been undertaken for a task, complete your first or initial assessment of the activity. Keep a record of the main findings of the risk assessment and any training provided. You should update risk assessments when you feel they are no longer valid, i.e. the task has changed, new equipment is being used, the needs of the individual need to be considered further etc.

Some people are particularly vulnerable and need special consideration in your risk assessments, e.g. new or expectant mothers, young persons, or anyone with specific needs. This includes those with ill health or disabilities.

## 6.2 Who should carry out a risk assessment?

A risk assessment must be carried out by a competent person. A person is regarded as competent when they have sufficient training and experience or knowledge of the workplace / activity and other qualities to enable them to properly assist in undertaking the measures referred to, i.e. an ability to make sound judgement; and knowledge of the best practicable means to reduce those risks identified.

Competence may be defined as a combination of knowledge, skills, experience and personal qualities.

Being aware of the activities conducted within your department and managing them safely should already be part of your daily management practices. The risk assessment process outlined in this procedure is a formal record of how you successfully manage these risks on a regular basis. You should feel confident and aware of the activities you and your staff undertake before carrying out a risk assessment. If you feel you or your staff require further training or advice, please contact a health and safety adviser or the learning and development team.

## 6.3 Completing a risk assessment

When assessing risks in the school, we will follow the process outlined below. We will also involve staff, where appropriate, to ensure that all possible hazards have been identified and to discuss control measures, following a risk assessment.

**Step 1: identify hazards** – we will consider activities, processes and substances within the school and establish what associated-hazards could injure or harm the health of staff, learners and visitors.

**Step 2: decide who may be harmed and how** – for each hazard, we will establish who might be harmed, listing groups rather than individuals. We will bear in mind that some people will have special requirements, for instance learners with special educational needs (SEN) and expectant mothers. We will then establish how these groups might be harmed.

**Step 3: evaluate the risks and decide on control measures (reviewing existing ones as well)** – we will establish the level of risk posed by each hazard and review existing control measures. We will balance the level of risk against the measures needed to control the risks and do everything that is reasonably practicable to protect people from harm.

**Step 4: record significant findings** – the findings from steps 1 to 3 will be written up and recorded in order to produce the risk assessment. A risk assessment template can be found in appendix 3 of this policy.

**Step 5: review the assessment and update, as needed** – we will review our risk assessments, as needed, and the following questions will be asked when doing so:

- have there been any significant changes?
- are there improvements that still need to be made?
- have staff or learners spotted a problem?
- have we learnt anything from accidents or near misses?

**Step 6: retaining risk assessments** – risk assessments are retained for 3 years after the length of time they apply. Risk assessments are securely disposed of.

Appendix 2 shows the risk assessment flow chart that takes you through the stages of carrying out a risk assessment.

Appendix 3 is an 'aide memoire' for things to think about when completing the risk assessment.

#### 6.4 How many risk assessments must I undertake?

A risk assessment does not have to be duplicated in order to satisfy requirements under a different set of regulations. For example, a risk assessment completed for a noise hazard does not have to be completed again if the noise hazard forms part of another assessment. Just reference and link the assessments.

#### 6.5 Generic Assessments

You may produce a generic or 'model' risk assessment where similar activities are undertaken in similar places of work.

The generic assessment should be able to account for the majority of hazards and risks that arise, but you will need to add more detail to the generic assessment to cover the more specific or individual circumstances of the location or task.

## 7 Mitigating Risk

The competent person in the school/department should complete the risk assessment form in Appendix 4. When the competent person has identified the significant hazards in the workplace, they will have to consider each one and decide whether the remaining risk level is high, medium or low. To be able to calculate the risk level, both the severity of the hazard(S) and the likelihood (C) of it occurring need to be given a value.

Referring to the risk matrix, the values for impact and the likelihood of it occurring are shown as either high, medium or low. This allows you to decide the risk level (R) by calculating the impact and the likelihood of it occurring, shown as:

### **Severity of hazard (S) x Likelihood (C)**

Once managers and staff have identified a risk level they will need to create an action plan and give each risk an appropriate action level (e.g. deal with immediately or deal with within three months of the assessment). An action plan will help you prioritise and plan the actions that you and all those affected should then carry out.

This action plan should ideally be prepared within seven days of completing the risk assessment and should be shared with other managers, members of staff and, through appropriate routes, with trade union representatives.

## 8 Training

Managers must make sure employees and others affected are aware of the risks they face in the workplace and about the control measures put in place to manage the risks. Managers need to make sure they communicate in a way that ensures all employees understand what is required of them. This means thinking about staff in a minority group who may require an alternative format or more specific training to suit their individual needs.

Health and safety training must be provided to new employees as part of their induction. If the risks facing employees and associated parties change, managers must provide them with refresher training.

In addition to constantly providing them with the most up-to-date information, managers need to ensure they provide employees with the level of training necessary to enable them to work safely. This means that when allocating work to staff, managers must make sure that the demands of the task do not exceed their individual level of knowledge or their capability.

Managers are advised to keep records of what information and training has been provided and to whom.

### 8.1 What training is available?

There are a number of health and safety training courses available through the RLT. Staff induction to TTAPA includes an introduction to health and safety. After induction, staff should identify with their manager both the general and the more specific health and safety

training needed to allow them to do their job. Some of the general health and safety training available includes:

- display screen equipment;
- health and safety awareness;
- manual handling;
- risk assessment.

### 8.2 Where can managers get health and safety help and advice?

Health and Safety Advisers are available to help you carry out your responsibilities through Compliance Education and the Rowan Learning Trust.

## 9 Emergency procedures

Managers need to think about emergencies such as fires and bomb alerts. Written guidance detailing how employees and others affected will stop work and get to a safe place will need to be in place. Managers may require certain employees to carry out particular tasks in an emergency (e.g. fire wardens) and must therefore make sure employees are competent to do what is required of them. Emergency co-ordinators must be made known to everyone.

## 10 Monitoring arrangements

Risk assessments are written as needed and reviewed by the relevant competent person. This policy will be reviewed annually by the Headteacher and approved by the LGC.

## 11 Links with other policies

This policy should be read alongside the following policies:

- *First aid*
- *Health and safety*
- *Supporting Learners with Medical Conditions*

## Appendix 1: Statutory risk assessment list

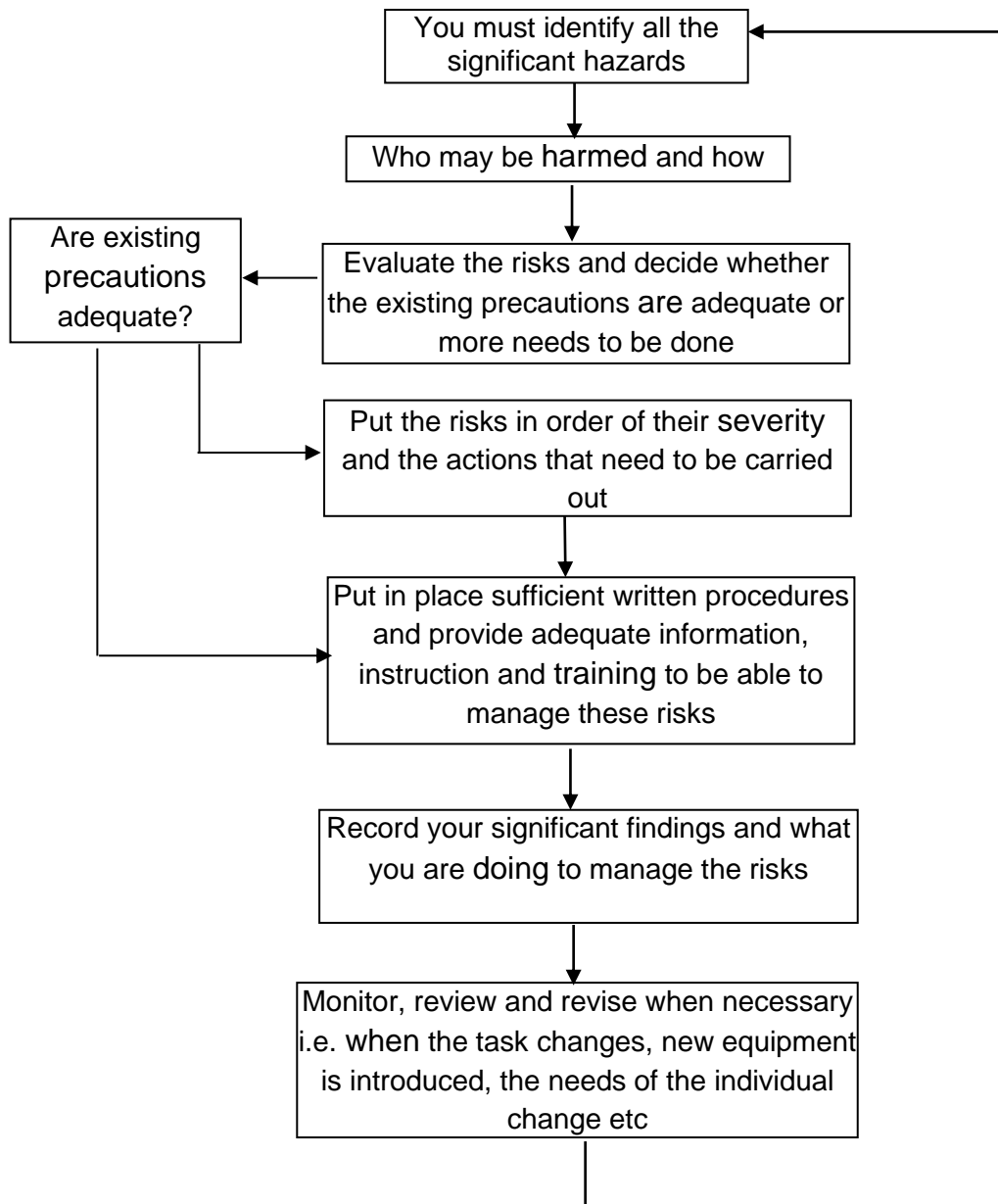
Schools are required to have the following risk assessments in place:

- Asbestos;
- Children being drawn into terrorism;\*
- Display Screen Equipment;
- Fire;
- First Aid;
- Manual Handling;
- Public health incidents, including Covid-19;
- Substances hazardous to health;
- Swimming pools (TTAPA does not have a swimming pool on either campus);
- Workers under the age of 18 (TTAPA does not employ anyone under the age of 18);
- Working at height.

*\*TTAPA would complete this on individual children rather than cohorts due to the transience of the learners.*



## Appendix 2 - Risk assessment flowchart



### Appendix 3 Things to consider when completing the risk assessment.

- Think about the activities being undertaken, the locations and the people carrying out the tasks/activity;
- Identify the significant risks;
- Consider whether or not all legal requirements and industry standards are being met;
- Consider the types of equipment, the way they are used, who is using them and the work activities undertaken. NB: Actual practice may differ from what is written in the department manual. Shortcuts and incorrect ways of working can create risks that need to be noted and managed. Risk assessments should always be carried out taking into account the experiences and opinions of those carrying out the task;
- Assess how the work is organised;
- Think about how the workplace and workstation is fitted and laid out;
- Consider the nature of any physical, biological or chemical agents staff may be exposed to, for how long and to what extent;
- Consider any restrictions on the work that can be undertaken (i.e. because of the physical capabilities or health of staff);
- Assess the extent of the health and safety training provided, or that needs to be provided, to the persons concerned;
- Discuss and identify individual/group needs and provide staff training on health and safety matters. Ensure the risks they face and all training provided is fully understood. Induction training should be conducted on the first day;
- Think about the need for supervision while at work, the level of supervision that will be provided and which competent persons will undertake the supervision;
- Keep a record of the main findings of the risk assessment and any training provided. Update the risk assessment when you feel it is no longer valid i.e. the task has changed, new equipment is being used, the needs of the individual have changed etc;
- Think about whether or not any health surveillance is required;

Step 1 What are the hazards?	Step 2 Who might be harmed and how?	Step 3 What are you already doing?	Step 4 Is anything further needed?	Step 5 Action & review
<p><i>Spot hazards by:</i></p> <ul style="list-style-type: none"> <li>➤ walking around your workplace;</li> <li>➤ asking those doing the task what they think;</li> <li>➤ checking manufacturers' instructions;</li> <li>➤ considering health hazards.</li> </ul>	<p><i>Identify groups of people, consider:</i></p> <ul style="list-style-type: none"> <li>➤ learners;</li> <li>➤ staff including temporary / supply staff, and lone workers;</li> <li>➤ visitors including contractors and other members of the public;</li> <li>➤ volunteers.</li> </ul>	<p><i>List what is already in place to reduce the likelihood of harm or make any harm less serious, examples include:</i></p> <ul style="list-style-type: none"> <li>➤ procedures, safe systems of working;</li> <li>➤ protective measures including personal protective equipment (PPE), 360 assessments;</li> <li>➤ training.</li> </ul>	<p><i>You need to make sure that you have reduced risks 'so far as is reasonably practicable'.</i></p> <p>An easy way of doing this is to compare what you are already doing with good practice. If there is a difference, list what needs to be done.</p>	<p><i>Remember to prioritise/ deal with those hazards that are high-risk and have serious consequences first.</i></p> <p>List:</p> <ul style="list-style-type: none"> <li>➤ actions required;</li> <li>➤ who needs to do them;</li> <li>➤ by when;</li> <li>➤ check actions completed.</li> </ul>

## Appendix 4: Three Towers Risk Assessment

Ref:

Risk Assessment

\* Where manual handling is undertaken and/or noise at work is a hazard, supplementary risk assessments are required where the hazard poses a significant risk.

\*\* If hazardous substances are used and/or work at height is undertaken then supplementary risk assessments MUST be carried out.

<b>Activity / Task:</b>							<b>Date of Assessment:</b>				
<b>Person Completing Risk Assessment:</b>				<b>Area:</b>			<b>Instructions / Training / Supervision – Required / Received:</b>				
<b>Equipment Required for Activity / Task:</b>				<b>Hazardous Substances to be used (COSHH):</b>			<b>Manual Handling*:</b>				
<b>Noise*:</b>				<b>PPE Required for Activity / Task:</b>			<b>Working at Height**:</b>				
Hazard	Risk	Individuals at risk	Current control measures in use List the control measures actually used	Risk Factor			Further control measures What further control measures are needed if risk level is too high?	Reduced Risk Factor			Action Who will act and when
				S	C	R		S	C	R	

## Risk Assessment Form: Completion Guidelines

1. Top section of this form should reflect the details of the activity/task being assessed and hazard control measures in place at the time the assessment is carried out.
2. ALL @Significant@ hazards in the workplace where the activity/task is being carried out should be recorded in the section headed "Hazards", together with the assessor's estimate of the severity (S) and likelihood of occurrence (C) using the risk matrix below. Note that a narrative description is also required.
3. In the section headed "Further control measures" it is important that the recommended actions are specified. (Note: this may include, in extreme instances, an instruction to stop the activity until certain further control actions have been carried out. In other cases, the timescale for undertaking the further control measures should be specified).
4. The Reduced Risk Factor numerical value should be entered to show the effect of implementing the further control measures for each significant hazard identified.

		Likelihood (C)				
Severity (S)	Risk Matrix	1 – Very unlikely Only occur in exceptional circumstances	2 – Possible but unlikely Probability low and risk minimal	3 – Quite Possible Additional factors could precipitate an occurrence but unlikely without such factors	4 – Likely Probable, only requires additional factor eg carelessness, bad weather etc	5 – Very likely Likely to occur unless corrective measures are not taken
	<b>1 – Minimal.</b> No adverse outcome or injury. No time off work.	1	2	3	4	5
	<b>2 – Slight</b> Minor injury requiring first aid treatment then return to work	2	4	6	8	10
	<b>3 – Moderate</b> Moderate / Semi-permanent injury. Off work 3 days or more RIDDOR reportable	3	6	9	12	15
	<b>4 – High</b> Significant injury including permanent injury. More than 7 days absence. RIDDOR reportable	4	8	12	16	20
	<b>5 – Very high</b> Serious injury resulting in HSE involvement iife changing / threatening injury, even death	5	10	15	20	25
Risk Rating (S x C = R)	Risk Level (R)	Action				
20-25	H	<b>STOP</b> – Stop activity and take immediate action				
15-16	H	<b>URGENT ACTION</b> – Take immediate action and stop activity if necessary, maintain existing controls rigorously				
8-12	M	<b>ACTION</b> – Improve within specified timescales				
3-6	L	<b>MONITOR</b> – Look to improve at the next review or if there is a significant change				
1-2	L	<b>NO ACTION</b> – No further action but ensure controls are maintained and reviewed				