



Three Towers
An Alternative Provision Academy
Expanding Horizons

Risk Assessment Procedures

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THREE TOWERS



Procedures Document Version Control

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Major changes	
Full re-write	

Statement of Intent

We are committed to providing a safe environment for all members of our school community. This document sets out the procedures we follow to identify and manage risks to the health and safety of staff, learners and visitors.

1 Introduction

Leaders 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 shares a workplace with another employer, leaders must co-operate with them and co-ordinate the management of health and safety. Leaders 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:

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 policy

- 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 to 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 that schools are expected to assess the risk of pupils being drawn into terrorism
- [The Health and Safety Executive \(HSE\)](#) says schools that manage their own pools must conduct a risk assessment

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

Hazard – something with the potential to cause harm to people such as chemicals, electricity, an open drawer or working from height.

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 (CM) – action taken to prevent people being harmed.

Risk assessment (RA) – 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

Dynamic Risk Assessment (DRA) – is an assessment that takes into account unexpected or short, temporary changes that require immediate amendments to be made to control measures. This can include risk assessments being made as an incident is unfolding.

Generic Risk Assessment (GRA) – is an individual risk assessment covering the common significant hazards that staff and other face on a daily basis such as low-risk activities or repeated activities that can be documented in another way.

Significant and Sufficient Risk – is an assessment that is proportionate to the risk and ensures that all relevant hazards are addressed; complies with statutory guidance; ensures all groups who are affected are considered; takes account of existing control measures; and identifies further measures as necessary.

5 Roles & Responsibilities

5.1 The Board of Trustees of Rowan Learning Trust (RLT) has ultimate responsibility for health and safety matters in the school but will delegate day-to-day responsibility to the Headteacher in accordance with the scheme of delegation. The board 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 or in the headteacher's absence the Director of Operations is responsible for ensuring that all risk assessments are completed and reviewed.

5.3 The Health & Safety Lead is responsible for:

- developing and implementing an effective approach to risk management in school
- reporting to the headteacher and the trust, as required.

5.4 School staff and volunteers 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.

5.5 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.

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

6 Principles of effective Risk Management and Assessment

We follow the following key principles of risk prevention:

- if possible, avoid a risk altogether;
- avoid introducing new hazards;
- evaluate unavoidable risks via a risk assessment;
- combat risks at the source;
- consult with those affected to adapt work to the requirements of the individuals;
- consult with the health and safety lead;
- take advantage of technological and technical progress where appropriate;
- implement risk prevention measures within policies;
- give priority to protection measures that safeguard the whole school;
- ensure that staff and learners understand what they must do to minimise risk;
- develop a positive approach to health and safety within school.

6.1 When should a risk assessment be carried out?

Where no previous risk assessment has been undertaken for a task, an initial assessment of the activity should be completed and the main findings recorded along with any training provided. Risk assessments should be updated when 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. Risk assessments should consider that some people are particularly vulnerable and need special consideration, e.g. new or expectant mothers, young persons, or anyone with specific needs such as ill health or disabilities.

6.2 Who should carry out a risk assessment?

A risk assessment must be carried out by a competent person. Competence may be defined as a combination of knowledge, skills, experience and personal qualities e.g. able to make sound judgements; and knowledge of the best practicable means to reduce those risks identified.

Being aware of school-related activities and managing them safely should already be part of standard operating procedures (SOPs). The risk assessment process outlined in this procedure is a formal record of how we successfully manage these risks on a regular basis.

6.3 Completing a risk assessment

We will follow the process outlined below and where appropriate involve staff to ensure that all possible hazards have been identified and control measures discussed, 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.

When identifying hazards, staff will:

- consider what could reasonably be expected to cause harm – this could include anything related to the school premises or the delivery of its curriculum, whether on- or off-site.
- consider potential risks from the perspective of other staff, visitors and pupils, including consulting these groups where necessary.
- give priority focus to significant hazards that could result in serious harm or affect several people.

To identify hazards, will have regard to factors including, but not limited to, the following:

- the environment, e.g. poor lighting or low/high temperature;
- slipping and tripping hazards, e.g. poorly maintained floors or stairs;
- fire, e.g. from flammable materials;
- chemicals and how they are used, and in what quantities, e.g. cleaning chemicals;
- moving parts of machinery, e.g. within workshops;
- on-site vehicle movements;
- asbestos on school premises;
- selection and management of contractors;
- work at height, e.g. scaffolding around buildings;
- ejection of materials, e.g. workshops and experiments;
- pressure systems, e.g. within boiler house;

- electricity, e.g. poor wiring, portable appliances, electrical experiments;
- dust, e.g. metal grinding and cement;
- fumes, e.g. chemicals;
- manual handling;
- noise;
- building design and maintenance;
- biological hazards, e.g. gardening or contact with bodily fluids;
- management of work-related stress;
- behaviour management, e.g. kicking, hitting and verbal abuse.

Step 2: decide who may be harmed and how – for each hazard, we will establish who might be harmed, listing groups rather than individuals. Staff will have regard to the following groups of people:

- staff;
- learners;
- visitors;
- contractors

We will bear in mind that some people will have special requirements, for instance:

- staff and learners with disabilities;
- learners with special educational needs (SEN);
- inexperienced staff;
- lone workers;
- expectant mothers;
- staff and learners with mental health needs;
- learners with safeguarding needs;
- other groups which could be particularly at risk depending on the nature of the hazard.

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.

We will

- consider whether industry standards are in place and whether all has been done that is reasonably practicable to keep the workplace safe;
- ensure that managing additional hazards does not interfere with other control measures, such as fire safety. will
- ensure that the following are in place:
 - adequate information, instruction or training
 - adequate systems or procedures

When implementing control measures, we will have due regard to whether the precautions:

- meet the standards set by a legal requirement;

- comply with the recognised industry standard;
- represent good practice;
- change existing precautions in place.

To reduce risks as far as reasonably practicable, we will endeavour to eradicate the hazard completely or control the risk significantly to ensure that harm can be deemed unlikely, or the likelihood of harm occurring is sufficiently minimised.

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. This means ensuring that significant hazards are recorded, as well as the control measures in place to mitigate those hazards, and the expected outcomes following the implementation of the control measures.

Where a risk assessment includes personal details about an individual, e.g. personal health information, we will ensure that the risk assessment maintains that individual's confidentiality and will therefore only share the details of the assessment where necessary.

Staff will not be required to show how the assessment was carried out, provided that:

- a proper check was made;
- the assessment details who might be affected;
- all the obvious, significant hazards are considered, taking into account the number of people who could be involved;
- the precautions are reasonable and the remaining risks are low.

All findings will be reported to the headteacher. Where the impact or likelihood of major risks cannot be minimised, the headteacher will decide whether the activity will still take place.

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 such as:

- when there are changes to an activity;
- after a near miss or accident/incident;
- when there are changes to the type of people involved in the activity;
- when there are changes to good practice;
- when there are changes to relevant legislation;
- annually, if for no other reason;
- dynamically as needs arise;

During the review the following questions will be asked:

- 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?

Risk assessments developed for high-risk activities will be reviewed on a **termly** basis by the individual who created the risk assessment and the headteacher.

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

[Appendix 2](#) is an 'aide memoire' for things to think about when completing a risk assessment and a flow chart of the stages of carrying out a risk assessment.

Hazards that are already covered under other risk assessments will be ticked as 'checked' in the general risk assessment. There will then be no need to conduct a separate risk assessment unless the risk changes.

7 Calculating & Mitigating Risk

When the hazards/areas of concern have been identified, we need decide what the risk level is high. To calculate the risk level, the severity of the hazard(S) and the likelihood (L) of it occurring need to be given a value.

The risk matrix ([Appendix 3](#)) gives values for the severity and the likelihood, which when multiplied together give a risk level (R)

Severity of hazard (S) x Likelihood (L)

When a risk level has been calculated, each risk has existing control measures identified and a new risk level is calculated. If further control measures are required, these are noted including when they should be completed (e.g. deal with immediately or deal with within three months of the assessment) and by who. An action plan should ideally be prepared within seven days of completing the risk assessment and should be shared with the relevant people.

Risk assessments should be completed using the template in [Appendix 4](#).

8 Training

All staff will receive regular training on basic risk management procedures. Staff with a responsibility for creating and completing risk assessments will receive in-depth training on risk management on an annual basis, in addition to the basic risk management training offered. All new staff members will receive training on risk management and will be required to familiarise themselves with this policy as part of their induction training.

Staff whose work involves a greater element of risk will have extra or specific training, including:

- using industrial machinery;
- managing asbestos;
- having responsibility for the storage of, and accountability for, potentially hazardous materials in their buildings.

Health and safety training is provided for new employees as part of their induction and all staff receive refresher training on an annual basis. If the risks change then updated training is provided. In addition to providing the most up-to-date information, staff are provided with the level of training necessary to enable them to work safely. This means that when allocating work to staff, we ensure that the demands of the task do not exceed an individual's level of knowledge or their capability. Staff also have a responsibility to their own health & safety and should request any general or specific health and safety training needed to allow them to do their job

There are a number of health and safety training courses available through the RLT including but not limited to:

- display screen equipment;

- health and safety awareness;
- manual handling;
- risk assessment.

Health and Safety Advisers are also available through Compliance Education.

9 Emergency procedures

Guidance on how staff should respond in emergency situations (e.g. fire, bomb threat) is shared with staff. It outlines how to stop work and get to a safe place. Certain staff are required and trained to carry out particular tasks in an emergency (e.g. fire wardens).

10 Monitoring arrangements

Risk assessments are written as needed and reviewed by the relevant competent person.

These procedures are reviewed after any incident or near-miss and at least annually by the Headteacher and shared with staff and the Local Governing Committee (LGC).

UNICEF - UNCRC

The UN Convention of the Rights of the Child sets out human rights of every person under 18 (Article 1) and applies to every child without discrimination, whatever their ethnicity, gender, religion, language, abilities or any other status, whatever they think or say, whatever their family background (Article 2). Articles directly relating to this policy are:

2 (Non-discrimination)	23 (Children with a disability)
3 (Best interests of the child)	28 (Right to education)
6 (Life, survival & development)	31 (Leisure, play & culture)
12 (Respect the views of the child)	

Appendix 1: Statutory risk assessment list

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

- Asbestos;
- Children being drawn into terrorism (Prevent Duty);
- Display Screen Equipment;
- Fire;
- First Aid (recommended by HSE);
- Lone Working;
- Manual Handling;
- Stress;
- Substances hazardous to health;
- Swimming pools (we do not have a swimming pool on either campus);
- Workers under the age of 18 (we do not employ anyone under the age of 18);
- Working at height.

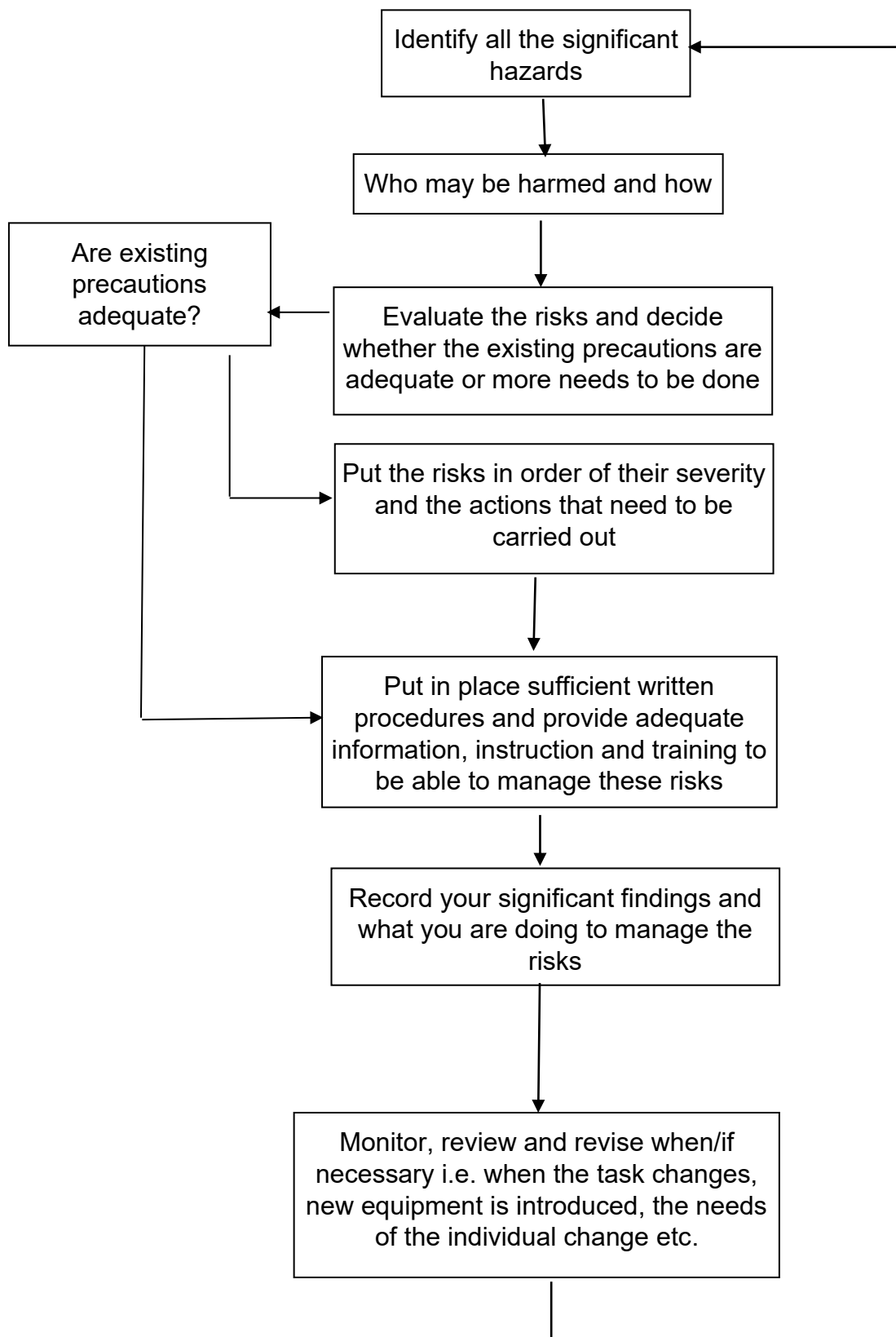
We must also carry out an individual risk assessment for any learner or member of staff when they have told you in writing that they:

- Are pregnant
- Are breastfeeding, or
- Have given birth in the last 6 months

Appendix 2 - Risk Assessment Aide Memoire

- 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, how it is used, who is using it 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/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 those 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 person 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 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
Spot hazards by: - walking around the workplace; - asking those doing the task what they think; - checking manufacturers' instructions; - considering health hazards.	Identify groups of people, consider: - learners; - staff including temporary/sup ply staff, lone workers; - visitors including contractors, members of the public; - volunteers.	List what is already in place to reduce the likelihood of harm or make any harm less serious, egs include: - procedures, safe systems of working; - protective measures including personal protective equipment (PPE), 360 assessments; - training.	Ensure that risks are reduced 'so far as is reasonably practicable'. An easy way of doing this is to compare what is already in place/happening with good practice. If there is a difference, list what needs to be done.	Prioritise/ deal with those hazards that are high-risk and have serious consequences first. List: - actions required; - who needs to do them; - by when; - check actions completed.



Appendix 3: Risk Matrix & 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 (L) 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 (L)						
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 e.g. carelessness, bad weather etc	5 – Very likely Likely to occur unless corrective measures are not taken
	1 – Minimal. No adverse outcome or injury. No time off work.	1	2	3	4	5
	2 – Slight Minor injury requiring first aid treatment then return to work	2	4	6	8	10
	3 – Moderate Moderate/Semi-permanent injury. Off work 3 days or more RIDDOR reportable	3	6	9	12	15
	4 – High Significant injury including permanent injury. More than 7 days absence. RIDDOR reportable	4	8	12	16	20
	5 – Very high Serious injury resulting in HSE involvement life changing/threatening injury, even death	5	10	15	20	25
Risk Rating (S x C = R)		Risk Level (R)		Action		
20-25		H		STOP – Stop activity and take immediate action		
15-16		H		URGENT ACTION – Take immediate action and stop activity if necessary, maintain existing controls rigorously		
8-12		M		ACTION – Improve within specified timescales		
3-6		L		MONITOR – Look to improve at the next review or if there is a significant change		
1-2		L		NO ACTION – No further action but ensure controls are maintained and reviewed		

Appendix 4: Three Towers Risk Assessment

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.

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