

Three Counties Academy Trust



Working at Height Policy

#HS5

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Subject to periodic amendment. To be reviewed in full no later than 5th March 2029

Version history

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Contents:

Version history

Common abbreviations and acronyms

Statement of intent

1. Legal framework
2. Roles and responsibilities
3. Working at heights procedure
4. Risk assessment
5. Control measures
6. Training

Monitoring and review

Appendices

- a. Annual acknowledgement statement
- b. Working at Height Risk Assessment Template

Common abbreviations and acronyms

AA	Admissions Authority	GPA	Government Procurement Arrangement
AAI	Adrenaline Auto-Injector (Epi Pen)	HASH	Herefordshire Association of Secondary Heads
ACM	Asbestos Containing Materials	HBV	Honour Based Violence
AFH	Academies Financial Handbook	HR	Human Resources
AHT	Assistant Headteacher	H&S	Health and Safety
AIR	Attendance Intervention Reviews	HoS	Head of School
APIs	Application Programme Interfaces	HSE	Health and Safety Executive
BAME	Black, Asian and Minority Ethnic Backgrounds	ICO	Information Commissioners Office
BCP	Business Continuity Plan	IHP	Individual Healthcare Plan
BFR	Budget Forecast Return	IRMS	Information and Records Management Society
CAMHS	Child and Adolescent Mental Health Services	IWF	Internet Watch Foundation
CEO	Chief Executive Officer	KCSIE	Keeping Children Safe in Education
CFO	Chief Financial Officer	KS1/2/3/4	Key Stage 1/2/3/4
CIF	Condition Improvement Fund	LAC	Looked After Child
CIN	Child in Need	LADO	Local Authority Designated Officer
CLA	Children Looked After	LGB	Local Governing Body
CMIE	Child Missing in Education	LLC	Low-Level Concerns

COO	Chief Operating Officer	LSA	Learning Support Assistants
COSHH	Control and Substances Hazardous to Health	MASH	Multi-Agency Safeguarding Hub
CP	Child Protection	MAT	Multi-Academy Trust
CPD	Continuing Professional Development	MFA	Multi-Factor Authentication
CSCS	Children's Social Care Services	MFL	Modern Foreign Language
CSE	Child Sexual Exploitation	NCSC's	National Cyber Security Centres
CTIRU	Counter-Terrorism Internet Referral Unit	NPQEL	National Professional Qualification in Executive Leadership
CWD	Children with Disabilities	PA	Persistent Absence
DBS	Disclosure and Barring Service	PAN	Published Admission Number
DDSL	Deputy Designated Safeguarding Lead	PECR	Privacy and Electronic Communications Regulations
DfE	Department for Education	PEP	Personal Education Plan
DHT	Deputy Headteacher	PEEP	Personal Emergency Evacuation Plan
DSE	Display Screen Equipment	PEx	Permanent Exclusion
DSL	Designated Safeguarding Lead	PLAC	Previously Looked After Child
DPO	Data Protection Officer	PP	Pupil Premium
EAL	English as an Additional Language	PSHE	Personal, Social and Health Education
ECT	Early Career Teacher	PSED	Public Sector Equality Duty

EHA	Early Help Assessment	PTFA	Parent, Teacher and Friends Association
EHCNA	Education, Health and Care Needs Assessment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
EHCP	Education, Health and Care Plan	RHE	Relationships and Health Education
EHE	Elective Home Education	RSHE	Relationships, Sex and Health Education
ELSA	Emotional, Literacy and Support Assistant	SALT	Speech and Language Therapist
ESFA	Education and Skills Funding Agency	SARC	Sexual Assault Referral Centre
EVC	Educational Visit Coordinator	SBM	School Business Manager
EWO	Education Welfare and Safeguarding Support Officer	SCCs	Standard Contractual Clauses
EYFS	Early Years Foundation Stage	SDQ	Strengths and Difficulties Questionnaire
FBV	Fundamental British Values	SEMH	Social, Emotional, and Mental Health
FGM	Female Genital Mutilation	SENCO	Special Educational Needs Coordinator
FOI	Freedom of Information	SEND	Special Educational Needs and Disabilities
FSM	Free School Meals	SLA's	Service Level Agreements
FTS	Find a Tender Service	STEM	Science, Technology, Engineering and Maths
GAG	General Annual Grant	TA	Teaching Assistant
GDPR	General Data Protection Regulation	TCAT	Three Counties Academy Trust
GIAS	Get Information about Schools	VSH	Virtual School Headteacher

Statement of intent

Three Counties Academy Trust (TCAT), recognise that there may be an increased risk to the health and safety of employees when working at height. This policy has been established to identify risks and manage the risks accordingly.

TCAT has a duty under the Health and Safety at Work etc. Act 1974 and The Management of Health and Safety at Work Regulations 1999 to ensure, as far as is reasonably practicable, the health, safety, and welfare of employees. TCAT also has obligations under The Work at Height Regulations 2005 (as amended).

Within this policy, 'working at height' refers to situations where staff, in the course of their duties, work at heights and are physically isolated from colleagues, possibly without immediate access to assistance.

TCAT adopts the definition of the Health and Safety Executive (HSE), which defines work at heights as any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury or death.

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Health and Safety at Work etc. Act 1974
- The Work at Height Regulations 2005 (as amended)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies and documents:

- Lone Worker Policy (HR17)
- Health and Safety Policy (HS1)
- First Aid Policy (HS2)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board and where delegated Local Governing Bodies are responsible for:

- Ensuring the effective implementation of this policy
- Ensuring appropriate procedures are in place for working at height which protect the safety of pupils, staff, and other visitors to any TCAT

The Headteacher/Head of School will:

- Ensure working at height risk assessments are undertaken as required
- Authorise a list of approved working at height activities
- Ensure procedures are in place to secure the quality and safety of equipment used for working at height activities

- Ensure that only individuals with the appropriate training undertake work at height

The Trust Estate Manager will be responsible for:

- Regularly checking equipment used for working at height activities and arranging for equipment to be replaced when needed
- Ensuring any equipment used when working at height is used correctly and in line with TCAT risk assessments]
- Establishing a list of approved working at height activities
- Maintain a record of training and instruction issued to staff working at height

3. Working at heights procedure

The Headteacher/Head of School in consultation with the Trust Estate Manager will be responsible for ensuring suitable procedures are in place for undertaking risk assessments for all situations requiring work at height. These procedures will ensure that all involved are aware of the precautions and methods of work to be followed, including emergency action to be taken if necessary.

Working at height will be avoided where possible, but where work at height cannot be avoided, control measures will be implemented to ensure the risk and consequences of falls are prevented as much as possible. These measures will be implemented on a case-by-case basis, but may include:

- Where pre-planned working at height is possible, obtaining the advice and authorisation to do so from the Trust Estate Manager
- Considering weather conditions that could compromise safety
- Undertaking as much work as possible from the ground
- Checking that the place where work at height is to be undertaken is safe. Each place where people will work at height needs to be checked each time, before use
- Preventing materials or objects from falling or, if it is not reasonably practicable to do so, taking suitable and sufficient measures to make sure no one is likely to be injured
- Ensuring that workers can get safely to and from where they work at height
- Ensuring equipment is suitable, stable and strong enough for the job, and maintained and checked regularly
- Storing materials and objects safely to ensure they will not cause injury if they are disturbed or collapse
- Workers ensuring that they do not overload or overreach themselves when working at height

- Taking precautions when working on or near fragile surfaces
- Considering emergency evacuation and rescue procedures

An approved list of work at height activities will be established by the Trust Estate Manager, outlining situations where work at height may be authorised, and the necessary precautions and work methods to be followed. Providing the activity is on the approved list, work at height may be deemed 'authorised'. Unless explicitly stated on the approved list, work at height will only be undertaken following authorisation from the Trust Estate Manager.

It is the responsibility of the individual concerned to ensure all necessary precautions and safety measures are adhered to at all times, in accordance with their instructions and training.

Any person who becomes aware of circumstances involving work at height, where the existing control methods are ineffective must inform the Trust Estate Manager as soon as possible.

Risk assessments will cover all work currently undertaken at heights, or proposed to be, where the risk may be increased by the work activity itself, or the lack of available assistance should something go wrong. Once relevant tasks are identified, the following will be considered:

- **Plant and equipment:** Plant and equipment used by individuals working at height will be assessed for suitability and safety
- **Access and egress:** Some work at height may require access to locations that are difficult to access or egress. Assessments will consider whether these tasks are safe
- **Lone working:** Work at height will not be undertaken when working alone

Work equipment will be assembled and/or installed according to the manufacturer's instructions and in keeping with industry guidelines. Where the safety of the work equipment depends on how it has been installed and/or assembled, the Trust Estate Manager will ensure it is not used until it has been inspected in that position by a competent person.

Any equipment exposed to conditions that may cause it to deteriorate, and result in a dangerous situation, will be inspected at suitable intervals appropriate to the environment and use. A record will be maintained of any inspection for types of work equipment, including guard rails, toe-boards, barriers or similar collective means of protection, and working platforms, both fixed and mobile.

Working platforms used for construction work and from which a person could fall more than two metres will be inspected:

- After assembly or installation in any position
- After any event liable to have affected its stability
- At intervals not exceeding seven days

Where it is a mobile platform, a new inspection and report will not be required every time it is moved to a new location on TCAT premises.

Any equipment, such as a mobile elevating work platform (MEWP), which has come from an external supplier, will be accompanied by a clear indication to everyone involved, when the last thorough examination has been carried out.

4. Risk assessment

Working at Height risk assessments will include the following considerations:

- The safety of pupils, staff, visitors, contractors, and the general public
- The hazardous nature of any general work at height on the site, e.g., environmental conditions
- The required competency level of staff to undertake work at height
- The required level of competence and ability to use access equipment
- The required level of supervision
- The safest equipment to use on site
- The condition of access equipment and its maintenance
- Other methods of safe access for higher risk or time-consuming jobs at height

5. Control measures

In order to manage general risks, the following control measures will be put in place. Members of staff working at height will:

- Where possible, discuss the planned work in advance with the Trust Estate Manager
- Not undertake work for which they are not trained
- Take reasonable care of their health and safety
- Not put themselves in danger

- Know, and follow, safe working procedures
- Never rush or cut corners
- Follow reasonable targets
- Stop for regular breaks and, if possible, change activity after prolonged periods
- Inform the Headteacher/Head of School and Trust Estate Manager of any relevant medical conditions
- Inform the Headteacher/Head of School and Trust Estate Manager of any hazards or accidents encountered

The following communication procedures will also be put in place:

- The worker will carry a mobile telephone at all times when working at height
- The worker will inform someone when they are working at height, how long they will be, and when they expect to be finished
- In the event that a worker has an accident or falls into difficulties, they are to use their mobile telephone to contact the Headteacher/Head of School or Trust Estate Manager, their nominated person, or the emergency services

First aid kits will be made available throughout all TCAT sites. Their locations will be communicated to all members of staff.

6. Training

The Chief Finance Officer and Trust Estate Manager will ensure that only individuals with sufficient skills, knowledge and experience are employed to perform a task at height, providing, where necessary, the appropriate training by an accredited trade organisation.

Where staff are currently undergoing training, they will work under the supervision of somebody competent to work at heights.

Where a working at height activity is low-risk and of a short duration, competence requirements may be no more than making sure an employee receives instruction on how to use the equipment and appropriate on-the-job training.

Where a member of staff finds that they are required to use an item of access equipment on which they have not had instruction and/or training, or where they are unsure of correct or safe use, they will be required to contact the Trust Estate Manager prior to use.

An up-to-date record of all instruction and training given to staff members will be maintained by the Trust Estate Manager. Refresher training will be provided every three years.

This policy will be circulated to every staff member working at height, who will sign a statement which affirms that they have:

- Received a copy of the policy
- Read and understood the policy
- Agreed to comply with the policy

Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled full review date for this policy is 5th March 2029.

Signed by:

_____ Executive Headteacher/CEO

Date: _____

_____ Board appointed Trustee

Date: _____

Appendix A: Annual acknowledgement statement

Three Counties Academy Trust



Acknowledgement statement

In accordance with the Working at Heights Policy, I, the undersigned, hereby attest and affirm, that I have:

1. Received a copy of the policy
2. Read and understood the policy
3. Agreed to comply with the policy

Name:	Signature:
Date:	Trust Estate Manager Signature:

Appendix B: Working at Height Risk Assessment Template

Important note: *This risk assessment identifies typical examples and controls to illustrate how schools may manage certain risks. These can be used as a guide to think about hazards in your school and the steps needed to manage those risks. In order to be compliant with the law and protect your community, you must consider the specific hazards and controls your school needs and **must not** use this template without assessing your school's risks.*

Name of school

Assessment conducted by:	Job title:	Covered by this assessment:
Date of assessment:	Review interval:	Date of next review:

Risk rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major: Causes major physical injury, harm or ill health.	High (H)	H	Medium (M)
	Severe: Causes physical injury or illness requiring first aid.	H	M	Low (L)
	Minor: Causes physical or emotional discomfort.	M	L	L

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
Awareness of policies and procedures	<u>H</u>	<ul style="list-style-type: none"> • Staff are aware of the following policies and documentation, including, but not limited to: <ul style="list-style-type: none"> - Health and Safety Policy - Working at Heights Policy - First Aid Policy - Emergency Plan • Equipment required for working at height is used in line with the school's Health and Safety Policy and Working at Heights Policy. • All staff members are trained to correctly use equipment, such as ladders and kick stools, as part of their induction, including moving, supervising, and maintaining equipment. • Any contractors used to undertake work at height are made aware of the relevant school policies, such as the Health and Safety Policy, before contracted work begins. 	<u>Y</u>	Headteacher/ Head of School	XX.XX.XX	<u>M</u>

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • An approved list of work at height activities is established and communicated to all staff. • Working at height is not undertaken alone. • Staff do not undertake work at height for which they are not suitably trained. • Staff working at height stop for regular breaks and, if possible, change activity after prolonged periods of working at height in order to minimise accidents due to fatigue. • Staff working at height carry a working mobile phone on them at all times to ensure they can contact a nominated person, such as the <u>Headteacher/Head of School</u>, in case of emergency. • Staff inform the <u>Headteacher/Head of School</u> when they need to work at height, how long they will need to work height, and when they can expect the work to be finished. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
Use of equipment		<ul style="list-style-type: none"> • As much work as possible is undertaken from ground level before using equipment needed to work from height. • Equipment for undertaking work at height is easily accessible to staff members but securely stored when not in use to avoid unauthorised use. • All equipment is suitable for purpose and checked for defects before use. • All equipment is used in accordance with the manufacturer's instructions or those given by the <u>Trust Estate Manager</u> if the manufacturer's instructions are not available. • The <u>Trust Estate Manager</u> ensures equipment is well maintained and in good condition before use. • The <u>Trust Estate Manager</u> undertakes checks on the condition of equipment on a <u>termly</u> basis and maintains an up-to-date record of the findings of these checks. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Any defects or problems identified with the equipment are reported to the Trust Estate Manager immediately. • Equipment found to be defective is removed from the school and repaired or disposed of as soon as possible. • Staff members are instructed not to use makeshift steps, such as using tables or chairs to stand on. • A range of equipment is available, allowing staff members to reach a variety of heights in order to reduce overstretching and accidents. • A kick stool is used where necessary, ensuring the environmental and surface conditions are suitable. • Staff are made aware of the maximum working height – this information is given in accordance with the manufacturer’s instructions, or where these are not available, maximum working height for equipment is defined as the staff member’s waist not rising above the top step. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Under no circumstances is the maximum working height exceeded when using equipment. • Staff members are encouraged to re-position steps rather than overstretch. • Equipment, such as ladders, is used for a short duration of time, with a maximum of <u>30 minutes</u> per use; however, staff are encouraged not to rush, in order to reduce the risk of accidents. • Staff members are advised to wear appropriate footwear when using equipment, such as shoes with a flat sole. • Equipment is not left unsupervised in order to avoid obstruction and unauthorised use. • Equipment does not obstruct fire exits or evacuation points, including when stored. • Where equipment used to work from height obstructs others, appropriate cautions are put in place to warn others, such as signs. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Suitable PPE is available to use, where necessary. 				
Manual handling		<ul style="list-style-type: none"> • Staff members are trained in appropriate techniques for moving and handling equipment used to work from height. • A safe system of work is in place and effectively communicated to staff members during induction. • When working at heights, staff members are supervised and assisted by a colleague at ground level. • Team handling is used where necessary. • When moving equipment, staff members are advised to obtain help where needed. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> If a task involves a member of staff carrying more than 10 kg up a ladder or steps, a detailed manual handling risk assessment is undertaken prior to starting the task. 				
Stability		<ul style="list-style-type: none"> Each site used for the purpose of working at height is checked for safety and suitability before use, every time. Working at heights equipment is only used where floor surfaces are suitable, such as firm and even flooring. Working at height while on or near a fragile or uneven surface is avoided wherever possible. Staff abide by the maximum weight limit of equipment, in line with the manufacturer's instructions. Three points of contact are maintained at all times, in order to avoid overreaching. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Tools are not balanced on the equipment used to work from height, to minimise the risk of falling objects. • A tool belt is used in order to allow both hands to be kept free when using equipment. • The staff member supervising the task safely passes any tools needed to the person working at height. • The staff member supervising the task places their foot at the bottom of the ladder in order to steady the equipment for the duration of time the equipment is used. 				
Slips, trips and falls		<ul style="list-style-type: none"> • Risk assessments are undertaken prior to all work at height activities. • All slips, trips and falls involving staff members are recorded in the Incident Report Form for Staff Injuries. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Work at height is only undertaken when other people and obstacles are not in the immediate area. • Staff members who do not feel well, or are tired, do not undertake work at height, in order to reduce the risk of accidents. 				
Falling objects		<ul style="list-style-type: none"> • Items are stored securely away from pupils, ensuring that stored equipment cannot fall from height. • Tools, materials and debris are not thrown from height but carefully passed to another staff member instead. • Areas where there is a risk of falling objects are clearly indicated, such as using signs. • Where required, a rubbish chute is installed to collect and transport rubbish and debris to ground level. • Staff secure all items on their person before working at height. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> Items used by staff for working at height that cannot be secured on their person are secured safely at ground level and collected after the work is completed. 				
Electrocution		<ul style="list-style-type: none"> Before undertaking work at height, staff ensure any overhead cables are secured and out of the way. Hand tools and battery-operated tools are used wherever possible to minimise the risk of electrocution. Electrical equipment is inspected before and after use, with any defects reported to the Trust Estate Manager immediately. All portable equipment is PAT tested annually. 				
Environmental conditions		<ul style="list-style-type: none"> No work at height is undertaken outside during poor weather conditions, including rain, snow and strong winds. No work at height is undertaken inside during poor weather that affects the condition of nearby flooring, such as rain creating slippery floors. 				

Area for concern	Risk rating prior to action H/M/L	Recommended controls	In place? Yes/No	By whom?	Deadline	Risk rating following action H/M/L
		<ul style="list-style-type: none"> • Consideration is given to the high probability that the wind speed may be greater at the point of work than that at ground level. • In all weather conditions, as much work as possible is undertaken from ground level. 				
First aid		<ul style="list-style-type: none"> • There is at least <u>one</u> trained first-aider on site at all times during the school day, and the location of the nearest first aid kit is known prior to undertaking any work from height. • Emergency evacuation and rescue procedures are taken into account when working at height. • In the event of an injury, first aid is administered by the <u>school nurse</u> or a trained first-aider. • Accidents and injuries are reported to the <u>school nurse</u> in line with the school's <u>First Aid Policy</u>. 				