

# Health and Safety Policy

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**Westbury House School**

September 2023

Member of staff responsible: Clare King

Head:

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Policy witnessed and signed by School Proprietor & Chair of Governors:

Mr A Mehta

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Mr D Tidmarsh

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## 1 Aims

- 1.1 This is the health and safety policy of ILG which operates Westbury House School hereafter referred to within this policy as the **School** or **We**.
- 1.2 We aim to apply high standards in the management and control of all our operations, to include matters of health and safety in order to ensure that staff, pupils and those who visit the School or may otherwise be affected by the School's operation are safe.

## 2 Policy statement

- 2.1 Our statement of general policy is:
  - 2.1.1 to provide a culture of safety, equality, and protection
  - 2.1.2 to provide adequate control of the health and safety risks arising from our work activities
  - 2.1.3 to consult with our employees, pupils and anyone else affected on matters affecting their health and safety
  - 2.1.4 to provide and maintain a safe place of work, safe plant and equipment
  - 2.1.5 to ensure safe handling and use of substances
  - 2.1.6 to ensure we have access to one or more competent persons (persons with sufficient knowledge, training and experience) to assist us in complying with our health and safety obligations
  - 2.1.7 to provide information, instruction and supervision to employees
  - 2.1.8 to ensure all employees are competent to do their tasks, and to give them adequate training
  - 2.1.9 to prevent accidents and cases of work-related ill health
  - 2.1.10 to maintain safe and healthy working conditions
  - 2.1.11 to review and revise this policy as necessary at regular intervals
  - 2.1.12 to ensure that adequate resources are available for the management of health and safety issues.
- 2.2 In accordance with our obligations under the Health and Safety at Work etc. Act 1974, we have a duty to ensure the health, safety and welfare of employees and the health and safety of others affected by the School's operations. Although pupil welfare and well-being is not strictly within the remit of this policy, we recognise that it is inextricably linked with health and safety at the School.
- 2.3 We will safeguard and promote health, safety and welfare by:
  - 2.3.1 taking a proportionate and holistic approach to risk management
  - 2.3.2 ensuring that the Proprietor and the Senior Leadership Team are aware of and understand the School's health and safety and welfare policies and procedures and apply them sensibly and practically to the real risks in the School

- 2.3.3 ensuring that key staff have clearly established roles and responsibilities
  - 2.3.4 paperwork being kept to a minimum, with the significant hazards identified, their risks adequately controlled, and precautions clearly documented where needed
  - 2.3.5 consulting with staff and safety representatives and pupils, where appropriate, to find practical solutions to health and safety issues
  - 2.3.6 ensuring that practice and compliance is regularly monitored, feedback given, and lessons learned.
- 2.4 Any references to legislation in this policy include any subsequent amendments to that legislation.

### **3 Scope and application**

- 3.1 This health and safety policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).
- 3.2 The policy applies to all staff (including employees, fixed-term, part-time, temporary, and voluntary staff and helpers), pupils and visitors at the School.

### **4 Regulatory framework**

- 4.1 This policy has been prepared to meet the School's responsibilities under:
  - 4.1.1 Health and Safety at Work etc. Act 1974
  - 4.1.2 Statutory framework of the Early Years Foundation Stage (DfE, September 2023)
  - 4.1.3 Education (Independent School Standards) Regulations 2014
  - 4.1.4 Workplace (Health, Safety and Welfare) Regulations 1992
  - 4.1.5 Electricity at Work Regulations 1989
  - 4.1.6 Gas Safety (Installation and Use) Regulations 1998
  - 4.1.7 Health and Safety (Display Screen Equipment) Regulations 1992
  - 4.1.8 Manual Handling Operations Regulations 1992
  - 4.1.9 Control of Substances Hazardous to Health Regulations 2002 (**COSHH**)
  - 4.1.10 Control of Asbestos Regulations 2012
  - 4.1.11 Regulatory Reform (Fire Safety) Order 2005
  - 4.1.12 Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (**RIDDOR**)
  - 4.1.13 Data Protection Act 2018 and General Data Protection Regulation (GDPR).
- 4.2 This policy has regard to the following guidance and advice:
  - 4.2.1 Health and safety advice on legal duties and powers for local authorities, school leaders, school staff and governing bodies (DfE, February 2014); Keeping children safe in education (DfE, September 2023) (**KCSIE**)

- 4.2.2 Health and Safety: responsibilities and duties for schools (DfE, April 2022)
- 4.2.3 Good estate management for schools (DfE, April 2022)
- 4.2.4 Incident reporting in schools (accidents, diseases, and dangerous occurrences): guidance for employers (Health and Safety Executive (HSE) EDIS1 (revision 3), October 2013); and
- 4.2.5 Using contractors: a brief guide (HSE, INDG368 (revision 1), June 2012).
- 4.2.6 Approved Code of Practice Legionnaires' Disease L8 (HSE 2013).
- 4.3 The following School policies, procedures, documents and resource material are relevant to this policy:
  - 4.3.1 Safeguarding and child protection policy (and relevant addendums)
  - 4.3.2 Supervision of pupils policy
  - 4.3.3 Educational visits (Risk Assessment) policy
  - 4.3.4 First Aid policy
  - 4.3.5 Fire policy
  - 4.3.6 Emergency planning and Critical incident policy
  - 4.3.7 School rules

## **5 Publication and availability**

- 5.1 This policy is published on the School website
- 5.2 This policy is available in hard copy on request from the School Office
- 5.3 A copy of the policy is available for inspection from the School Secretary during the School day.
- 5.4 This policy can be made available in large print if required.

## **6 Responsibility statement and allocation of tasks**

- 6.1 As an employer, ILG has overall responsibility for health and safety at the School.
- 6.2 The Proprietor acting on behalf of ILG is committed to protecting the health and safety of those affected by the School's operation, including but not restricted to its employees, pupils and visitors to the School site.
- 6.3 The Proprietor] delegate responsibility for health and safety matters affecting the academic staff and pupils to the Head and responsibility for health and safety matters affecting the non-academic staff to the School Secretary.
- 6.4 To ensure that efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Keeping the policy up to date and compliant with the law and best practice	Head & Health and Safety Officer	As required, at least annually
Monitoring the implementation of the policy (ensuring its accessibility and availability), relevant risk assessments and any action taken in response and evaluating effectiveness	Head & Health and Safety Officer	As required, and recommended to be at least annually
Reporting any policy amendments to the Proprietor	Head & Health and Safety Officer	As required, and recommended to be at least annually
Seeking input from interested groups (such as pupils, staff and parents) to consider improvements to the School's processes under the policy	Head & Health and Safety Officer	As required, and recommended to be at least annually
Ensuring that all reported breaches of this policy are recorded	Head & Health and Safety Officer	As required, and recommended to be at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR.	Head & Health and Safety Officer	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Head & Health and Safety Officer	As required and at least termly
Formal review	Proprietor	As required, and at least every 2 years

- 6.5 Employees also have legal responsibilities to take care of the health and safety of themselves and others, and to co-operate with their employer in order to comply with the law. All employees must:
- 6.5.1 co-operate with supervisors and managers on health and safety matters
  - 6.5.2 undertake their work in accordance with training and instructions
  - 6.5.3 not interfere with anything provided to safeguard their health and safety

- 6.5.4 take reasonable care of their own health and safety; and
- 6.5.5 report all health and safety concerns to an appropriate person (as detailed in this policy).
- 6.6 In addition, teachers and other staff have a common law duty to act as any prudent parent would do when in charge of pupils.
- 6.7 All pupils and visitors must:
  - 6.7.1 co-operate on health and safety matters and in particular follow the instructions of staff in the event of an emergency
  - 6.7.2 take reasonable care for their own health and safety and that of others at the School
  - 6.7.3 observe standards of dress consistent with safety and / or hygiene
  - 6.7.4 use and not wilfully misuse, neglect or interfere with anything provided to safeguard their health and safety; and
  - 6.7.5 report all health and safety concerns to a member of staff.

## 7 **Risk assessment: health and safety**

- 7.1 We promote and safeguard the health and safety of employees, pupils and others through the systematic assessment of risks posed by the School's operation.
- 7.2 Risk assessments of the School's activities will be carried out to identify hazards (anything with the potential to cause harm to persons or property) and measure and evaluate risks (the likelihood of harm caused by the hazards) to employees, pupils and others who may be affected by the School's operation. This will be undertaken by the conduct of appropriate risk assessments which should identify, prioritise and implement control measures necessary to reduce the risk to the level required by law.
- 7.3 Risk assessments will be conducted / reviewed for new and / or expectant mothers, employees aged under 18 and night and / or lone workers.
- 7.4 Risk assessments will include key areas of risk including:
  - 7.4.1 supervision arrangements, school trips, hazardous or adventure activities, specific events
  - 7.4.2 personal protective equipment, display screen equipment, manual handling operations, working at height, substances hazardous to health, noise at work, asbestos at work and fire safety
  - 7.4.3 use of high-risk areas, such as playgrounds, machinery and PE equipment.
  - 7.4.4 Use of classrooms and specific curriculum areas such as PE, Art/DT and Science.
- 7.5 Risk assessments are the overall responsibility of the Head who will delegate their completion to the member of staff who has ownership of the space. Communal area RA will be completed by the Head or School Secretary.
- 7.6 The findings of the risk assessments will be reported to the School Secretary
- 7.7 Action required to remove / control risks will be approved by the Head.

7.8 The School Secretary will be responsible for ensuring the action required is implemented.

7.9 Risk assessments will be reviewed annually or when the activity changes, whichever is soonest.

7.10 Further guidance on risk assessment can be found in Appendix 1.

## **8 Risk assessment: welfare issues**

8.1 Our specific arrangements for safeguarding and promoting pupils' and staff welfare are set out in:

8.1.1 The Educational Visits (RA) policy

8.1.2 child protection and anti-bullying and behaviour policies

8.1.3 Risk assessment: pupil welfare

8.1.4 Staff wellbeing at work

8.1.5 Appendix 1.

## **9 Consultation with employees and pupils**

9.1 We will consult employees directly and in good time on issues such as the introduction of measures which may affect their health and safety, the appointment of a competent person, and information provision and training on health and safety.

9.2 We will also consult with pupils, where appropriate.

9.3 We use the curriculum and provide children with opportunities to discuss health and safety issues.

## **10 Information, instruction, and supervision**

10.1 The health and safety law poster is displayed in the Staffroom

10.2 Further notices relating to first aid and fire safety will be displayed as appropriate

10.3 A certificate of employers' liability insurance is displayed in the front entrance hall

10.4 Health and safety advice is available from the Board level Governor with responsibility for H&S

## **11 Competency for tasks and training**

11.1 All employees are provided with adequate information on risks to their health and safety at work, preventative and protective measures to control those risks, emergency procedures, and their general health and safety duties.

11.2 All employees are given health and safety induction training when they start work, which covers these issues and health and safety basics such as first aid and evacuation procedures.

11.3 We will also ensure that all employees receive job specific health and safety training, including risk assessment training, where appropriate.

11.4 Job specific training will be arranged by the SLT

- 11.5 The School will provide further training if risks change and refresher training when skills are not frequently used.
- 11.6 Training records are kept in individual staff records, a shared area T:\STAFF\CONTINUING PROF DEV (CPD) as well as on the ILG centralised Training Matrix
- 11.7 Training will be identified, arranged and monitored by the Head & Health and Safety Officer. A wider range of 'duty of care' courses are available on TES EduCare which all staff can access.

## 12 **Workplace safety**

- 12.1 We will ensure that the School premises are safe and in good repair and are kept free of reasonably avoidable safety hazards and are fit for purpose and suitable for the age of pupils cared for and the activities provided on the premises.
- 12.2 We will take all reasonable steps to ensure that the School premises are maintained in such a way (to include ensuring that all traffic routes are of suitable construction, free from defects and obstructions and are adequately lit) to reduce the risk of slips and trips to employees, pupils and other users of School premises and that it complies with its obligations under the Workplace (Health, Safety and Welfare) Regulations 1992.
- 12.3 The School Secretary and/or Caretaker will arrange a regular survey of the School premises and the maintenance and repair of School premises and grounds including matters such as tree safety
- 12.4 We will promote effective infection control by ensuring that the School premises are kept clean and tidy.
- 12.5 We will ensure that access to particularly high risk areas and out of bounds areas of the grounds are appropriately controlled and restricted.

## 13 **Vehicle**

- 13.1 The school does not have its own vehicle.
- 13.2 No vehicles have access to the School site.
- 13.3 In the event that staff need to use their own vehicles to transport pupils, prior approval must be sought via email through the Head of Operations who will consult with insurers.

## 14 **Safe plant and equipment**

- 14.1 The School Secretary and Caretaker will be responsible for identifying all equipment / plant needing maintenance.
- 14.2 The School Secretary and Caretaker will be responsible for ensuring effective maintenance procedures are drawn up and implemented.
- 14.3 Any defects or problems found with plant / equipment should be reported to the School Secretary and the plant / equipment should be immediately taken out of use until it has been made safe.
- 14.4 The School Secretary and Caretaker will check that new plant and equipment meets health and safety standards before it is purchased.

14.5 We will ensure that employees are provided with suitable personal protective equipment where risks to their health and safety cannot be controlled in other ways.

14.6 We will ensure that employees use personal protective equipment correctly and are provided with adequate instructions and / or training on how to use it safely.

## 15 **Inspection and testing regime**

15.1 The School Secretary and Caretaker will ensure that all equipment and systems including mains and portable electrical equipment, emergency lighting, gas appliances and fittings, local exhaust ventilation, pressure systems, oil storage systems, lifting equipment and glazing, used at or by the School are well maintained, inspected and tested regularly by a competent and appropriately qualified person who has been authorised by the School and that records of inspection, maintenance and testing are retained.

15.2 In particular, the School will ensure that assessments are undertaken to comply with the Electricity at Work Regulations 1989, the Gas Safety (Installation and Use) Regulations 1998 and Regulatory Reform (Fire Safety) Order 2005.

15.3 The School Secretary and Caretaker will ensure that a risk assessment will be carried out to assess the risk of Legionella and relevant preventative control measures implemented in accordance with HSE Approved Code of Practice L8.

## 16 **Visual display units (VDUs) and display screen equipment**

16.1 We will take all reasonable steps to ensure the health and safety of users of VDUs and display screen equipment at in accordance with their duties under the Health and Safety (Display Screen Equipment) Regulations 1992.

## 17 **Manual handling**

17.1 We seek to avoid the need for **Manual handling** (defined for the purpose of this policy as the transporting of loads by hand or using bodily force) wherever possible.

17.2 Where Manual handling cannot be avoided, we will seek to reduce the risks related to Manual handling by providing training and guidance in manual handling techniques in accordance with the Manual Handling Operations Regulations 1992.

## 18 **Safe handling and use of substances**

18.1 We will have appropriate procedures in place to ensure that exposure to hazardous substances is minimised. In order to do so, we will assess the risks from all substances hazardous to health under the Control of Substances Hazardous to Health Regulations 2002 (**COSHH**) and prevent, reduce or control exposure of staff to these hazards by the institution of proper controls and protective equipment.

18.2 All staff, visitors and pupils will be advised of hazardous materials to be used by them and any policies relating to their use (including emergency procedures to deal with accidents / incidents) and will be given suitable information, instruction and training in their safe use, storage and handling.

18.3 The School Secretary will be responsible for identifying all substances which need a COSHH assessment.

18.4 The School Secretary will be responsible for overseeing COSHH assessments are in place.

- 18.5 The School Secretary and Caretaker will be responsible for ensuring that all actions identified in the assessments are implemented.
- 18.6 The School Secretary will be responsible for ensuring that all relevant employees are informed about the COSHH assessments.
- 18.7 Assessments will be reviewed on a regular basis or when the work activity changes, whichever is soonest.
- 18.8 All staff will ensure that hazardous substances are locked away after use and an up to date inventory maintained.

## 19 **Asbestos**

- 19.1 We recognise that all types of asbestos are dangerous and will manage the risks presented by asbestos containing materials (**ACM**) or presumed ACMs on the School premises by complying with the Control of Asbestos Regulations 2012 and in particular by:
  - 19.1.1 complying with our duties in relation to licensed and non-licensed work, including notifying the relevant enforcing authorities in relation to non-licensed work, where appropriate
  - 19.1.2 preparing and keeping up to date a record of the location and condition of ACMs or presumed ACMs
  - 19.1.3 carrying out a written assessment of the risks presented by ACMs and presumed ACMs
  - 19.1.4 preparing and implementing a written plan of action for managing the risks posed by ACM or presumed ACMs known as an **Asbestos Management Plan**
  - 19.1.5 regular inspections, reviews and / or monitoring, as appropriate
  - 19.1.6 ensuring that adequate records are kept in relation to non-licensed work done on ACM or presumed ACM at the School
  - 19.1.7 ensuring that all employees may come into contact with ACM or presumed ACM are adequately trained
  - 19.1.8 ensuring that information about the location and condition of ACMs or presumed ACMs is passed on to anyone who is likely to disturb it and to the emergency services in the event of an emergency
  - 19.1.9 ensuring that ACM or presumed ACM is not be disturbed unless prior agreement has been given by [• position] and there are appropriate control measures in place to ensure that staff, pupils or any other users of the School premises are not exposed to asbestos
  - 19.1.10 ensuring that only authorised staff and / or fully licensed contractors are permitted to carry out any work in the relation to ACM or presumed ACM.
- 19.2 If anyone disturbs or suspects that they have disturbed ACM they should:
  - 19.2.1 not disturb it further under any circumstances

19.2.2 ensure that access to the affected area is restricted and put up a warning sign stating "possible asbestos contamination"

19.2.3 immediately report it to the School Secretary who will take appropriate action; and

19.2.4 ensure that any clothing which have been covered in dust or debris is appropriately disposed of.

## 20 **Emergency procedures: fire and evacuation**

20.1 This policy should be read in conjunction with the School's fire policy.

20.2 We will carry out fire risk assessments to examine and control the likelihood of a fire starting and the consequences of a fire, pursuant to the Regulatory Reform (Fire Safety) Order 2005. This will include the identification of fire hazards and people at risk and implementing control measures to remove or reduce that risk. The findings will be recorded and staff and safety representatives will be informed of these.

20.3 The School Secretary is responsible for ensuring that fire risk assessments are undertaken on a regular reporting cycle of at least every 3 years and where there is reason suspect they are no longer valid or where significant changes to the premises of use.

20.4 The Head is responsible for ensuring that the findings of the risk assessments and any recommendations by the Fire Service are implemented. Escape routes are checked by either the School Secretary or nominated Fire Marshalls Fire doors must be free of obstruction and easily opened from the inside.

20.5 Fire extinguishers and other fire-fighting equipment (such as alarms, detectors and blankets) are maintained and checked by City Fire in order to ensure they are in working order.

20.6 Alarms are tested at least once per week before school starts.

20.7 The School Secretary is responsible for maintaining records in relation to fire safety procedures to include records of staff fire safety training, fire instructions, building signage, fire drills, fire precautions tests, and maintenance records and certificates.

20.8 In addition, the School will ensure that there are sufficient fire marshals (or deputies in their absence) on site at all times and that they are appropriately trained.

20.9 The fire marshals are:

Kris Beel  
Nichola Bradford  
Sabea Gangji  
Lauren Green  
Clare King  
Anita Sawyer

20.10 In addition to the School's procedures regarding fire, we will ensure that an emergency plan is prepared to cover all foreseeable major incidents which could put staff, pupils, visitors or other users of the School premises at risk and will ensure that staff and pupils are trained in what to do in an emergency evacuation. Such evacuation procedures should include any special arrangements required for employees or staff with disabilities or specific medical

conditions, using the PEEP template. A copy of the Fire Emergency Evacuation Plan (FEEP) and brief instructions for visitors are available at Reception.

- 20.11 Nothing in this policy prevents anyone from dialling 999 in an emergency.
- 20.12 All health and safety and fire emergencies should also be reported to ILG Board level Governor with responsibility for H&S who can be contacted on 07789 882597.
- 20.13 Where an evacuation is considered necessary, the main School fire bell will be activated, and the School's emergency routine followed.
- 20.14 The Assembly points are:
  - Lyton Road
  - Westbury Road
- 20.15 Emergency evacuation and fire drills will be tested at least once per term and the results recorded.

## 21 **Accidents, first aid and work-related ill health**

- 21.1 This policy should be read in conjunction with the School's first aid policy.
- 21.2 We will ensure that there are adequate numbers of appropriately qualified first aiders on the School premises and on School arranged trips and visits at all times.
- 21.3 Risk assessments will be undertaken to determine the level of equipment, facilities and personnel necessary to enable first aid to be rendered to a casualty. The School's risk assessment will also identify where specialist health surveillance is needed.
- 21.4 The appointed first aiders are:
  - Nichola Bradford
  - Lisa Cropley
  - Sabea Gangji
  - Lauren Green
  - Bhawna Kumar
  - Helen McCloskey
  - Natalie Prowse
  - Hau-Yi Pong
  - Claire Lowther
  - Meghna Sharma
  - Somya Singh
  - Anita Sawyer
  - Crystal Wai

- 21.5 The first aid boxes are kept:
- Medical Room Area (Nursery)
  - Library
  - Each Classroom where reasonably possible
  - Staffroom

21.6 All accidents are to be reported to the School Secretary and recorded in the accident book (see section 27 below).

21.7 The book is kept by the School Secretary at Reception.

21.8 We will take reasonable care to ensure that the health of their employees is not placed at risk. In doing so, the School will consider the risk of their employees suffering from stress through, for example, hours worked, the allocation and organisation of work, the way people deal with each other and the demands placed on staff.

21.9 All work-related ill health including work-related stress should be reported to the Head.

## 22 **Hirers, visitors, and contractors**

22.1 All hirers, visitors, and other users of the School premises (to include parents, contractors, delivery people and inspectors) must:

22.1.1 observe the rules of the School

22.1.2 ensure that they report to Reception where their identity will be checked, a pass issued and their host notified or alternatively have consulted with the School regarding the appropriate means of their access to and egress from the site and host arrangements. Thereafter, they should remain in the presence of their host unless express permission to the contrary has been given by the School

22.1.3 ensure that they are familiar with the School's fire and emergency evacuation procedures. In the event of the fire alarm sounding, they should proceed to the nearest assembly point.

22.2 Contractors will be selected and managed in accordance with HSE guidance and, where appropriate, in accordance with the Construction (Design and Management) Regulations 2015. All contractors who work at the School will be risk assessed in accordance with the School's safer recruitment procedures and appropriate measures put in place to safeguard pupils, this may include requiring regular contractors to confirm that they have had safeguarding training at the appropriate level to their role, implementing measures to segregate them from pupils, or to supervise them and/or to carry out appropriate checks in relation to them, including DBS checks where appropriate.

22.3 All contractors should be made aware of the relevant provisions in the School's safeguarding and child protection policy and procedures appropriate to their role at the School and taking into account the opportunity for contact with pupils, as a minimum this should include knowing the identity of the DSL and the duty to pass on any safeguarding concerns (through their line manager or direct to the School).

- 22.4 Contractors must also ensure safe working practices by all of their employees under the provisions of the Health and Safety at Work etc. Act 1974 and must pay due regard to the safety of all persons using the School premises.
- 22.5 The School will ensure that all contractors are fully briefed on the safety aspects of the job in question and satisfactorily supervised.
- 22.6 Contractors will be asked to complete an initial competency questionnaire and need to provide certain documents in order to be on the approved list. This applies to all ILG settings and Head Office.
- 22.7 Anyone who arranges work with contractors is responsible for ensuring that a safe system of work is in place, and that they are made aware of the procedures. A copy of this policy and the FEPP should be provided. A hot works permit must be used if applicable.

## 23 **Security**

- 23.1 We aim to provide a safe and secure environment for all employees, pupils, and other visitors to the School premises.
- 23.2 We restrict access to the School premises to members of the public in order to ensure the safety and security of employees, pupils and other visitors to the School premises and takes all reasonable measures to deter unauthorised public access to the premises.
- 23.3 We will take appropriate steps to ensure that there are adequate security arrangements for the School premises (which includes the School buildings and grounds) by ensuring that:
  - 23.3.1 there are sufficient security arrangements in place to protect the security of the premises and persons on it
  - 23.3.2 security assessments are conducted and reviewed regularly
  - 23.3.3 all employees and pupils are trained about the existence and operation of the School's security arrangements and that staff training is updated as required
  - 23.3.4 visitors to the premises are appropriately identified
  - 23.3.5 there are adequate supervision arrangements in place
  - 23.3.6 all security breaches or incidents are reported to ILG and / or to the police or other emergency services as appropriate
  - 23.3.7 security measures do not compromise or intrude on the reasonable privacy of employees and pupils.

## 24 **Protection from violence and harassment**

- 24.1 The School will not tolerate any act of violence or harassment in which an employee or pupil or any other person on the School site is abused, threatened or assaulted, or placed in fear for their own safety.
- 24.2 Incidents or acts of violence or harassment by pupils will also be dealt with in accordance with the School's behaviour policy.

- 24.3 In the event of an act of violence, harassment or serious security breach incident, those affected should take immediate steps to safeguard those affected and contact ILG / or the police as appropriate.
- 24.4 Violence or harassment by employees will constitute gross misconduct and will be dealt with under the School's disciplinary procedure. Violence or harassment by pupils is likely to be treated as a serious disciplinary offence which may warrant suspension, required removal or expulsion.
- 25 Lone workers**
- 25.1 We understand the additional hazards to staff safety presented by lone working (defined for the purpose of this policy as employees working by themselves in situations where there is no close or direct contact with other School staff).
- 25.2 Work activities involving lone workers will be risk assessed. The School will consider the additional hazards posed by lone working and introduce adequate control measures in response.
- 26 Training**
- 26.1 We ensure that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 26.2 The level and frequency of training depends on the role of the individual member of staff.
- 26.3 The School maintains written records of all staff training.
- 27 Reporting requirements and record keeping**
- 27.1 There is a legal obligation to report certain accidents, diseases, incidents, dangerous occurrences and / or near misses to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (**RIDDOR**). Reporting is most easily done online at [www.riddor.gov.uk](http://www.riddor.gov.uk). Fatal and "specified" injuries can also be reported by calling 0845 300 9923. Further guidance in relation to RIDDOR reporting can be found on the HSE website.
- 27.2 The Head is responsible for ensuring that the School complies with its reporting and record keeping obligations.
- 27.3 The Head is responsible for reporting accident, diseases and dangerous occurrences to the HSE or enforcing authority.
- 27.4 If anyone at the School is known or suspected to be suffering from disease which is classified as a notifiable disease, and / or in the opinion of a registered medical practitioner has an infection and / or is contaminated in a manner which could present significant harm to human health (as set out in the Health Protection (Notification) Regulations 2010), the School should ensure that a report is made by the proper officer at the relevant local authority. More information can be found at: <https://www.gov.uk/government/organisations/public-health-england>.
- 27.5 ILG will also consider whether the School is required to report the accident incident to any other regulatory body or organisation.

- 27.6 The School will notify local child protection agencies, as appropriate, of any serious accident or injury to, or the death of, any pupil or other child whilst in their care and act on any advice given.
- 27.7 Details of injuries, conditions, dangerous occurrences and occupational diseases should also be kept in an accident record book which must be kept for at least three years from the date of the last injury.
- 27.8 Following an incident or accident the School will take all reasonable steps to collect and preserve relevant evidence and documentation.
- 27.9 The School will not keep evidence and documentation containing personal information which has been collated as a result of an accident or incident for any longer than is reasonably necessary in compliance with the School's data protection obligations.
- 27.10 Where there is a risk of litigation, enforcement action or other proceedings, against or on behalf of the School, documents (which includes electronic documents) will generally be retained for at least six years unless:
- 27.10.1 the accident or incident involved a pupil or anyone else who was under the age of 18 at the time of the incident, in which case documentation will generally be retained at least until that person's 24th birthday, or
- 27.10.2 the accident or incident may have resulted in exposure to a substance which may be hazardous to health, such as asbestos, and / or there is a risk that any person may develop an occupational disease or illness or work-related medical condition, in which case records should be retained for a minimum of 40 years.
- 27.11 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 27.12 Where there are specific record keeping requirements under this policy, these are set out below:
- 27.12.1 all reported breaches of this policy will be recorded and this record will be reviewed annually by the Head
- 27.13 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data about pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's data protection policy.
- 28 Monitoring and internal investigation**
- 28.1 We monitor health and safety both actively and reactively. The Proprietor accept overall responsibility for, monitoring health and safety performance and for ensuring that the School meets the required health and safety standards.
- 28.2 At an operational level, the Head is responsible for, monitoring and reviewing health and safety measures, reviewing risk assessments, accident books / reports and accident investigations annually. Reviews include a review of health and safety related complaints and sanctions taken against employees and / or pupils for health and safety breaches.

- 28.3 ILG are responsible for investigating accidents, incidents and work-related causes of sickness absences, if required. Such investigations may be required to discover the root causes of an accident to prevent a recurrence, to discipline employees or pupils or to brief lawyers for the purpose of obtaining legal advice or to aid litigation. The following HSE guidance document should be used when investigating incidents (including accidents and near misses): <http://www.hse.gov.uk/pubns/hsg245.pdf>. Further 'Incident Investigation Guidelines' are available from the Head of Operations.
- 28.4 The School will not sanction any internal investigation which may prejudice the investigations of outside agencies.
- 28.5 Where appropriate, the School will seek legal advice from the School's solicitors before commencing an internal investigation. No admission of liability on the School's behalf shall be made without legal advice (if required) and prior agreement from the School's insurers. As a minimum, anything reported under RIDDOR or upheld safeguarding allegations must also be reported to the Board level lead for health & safety and ILG's insurance brokers.
- 28.6 As outlined in the ILG Employment Manual, in certain circumstances, breaches of health and safety regulations and/or law and/or the Health and Safety at Work Rules may constitute gross misconduct and may result in instant dismissal and possibly civil or criminal proceedings. In any event a failure to comply with the appropriate standards will render an employee liable to disciplinary action.

## 29 Version control

Date of adoption of this policy	September 2020
Date of last review of this policy	September 2023
Date for next review of this policy	Autumn 2024
Policy owner (SMT)	Head
Policy owner (Proprietor)	ILG

## **Appendix 1 Guidance on risk assessment**

A risk assessment is a careful examination of what in your work or activities could cause harm to people, so that you can weigh up whether you have taken enough precautions or should do more to prevent harm. A risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible measures to control real risks - those that are most likely and will cause the most harm.

The law does not expect you to eliminate all risk, but you are required to protect people "so far as is reasonably practicable".

When thinking about your risk assessment, remember:

- a hazard is anything that may cause harm, such trailing or bare electric cables, unrestrained windows on upper floors, shared fabric towels in washrooms and unlocked cupboards containing chemicals and / or cleaning fluids
- the risk is the chance, high or low, that somebody could be harmed by these and other hazards, together with an indication of how serious the harm could be.

### **Step 1: Identify the hazards**

First you need to work out how people could be harmed.

### **Step 2: Decide who might be harmed and how**

Identify groups of people who might be harmed and how they might be harmed, which includes employees, volunteers and helpers, pupils, visitors and contractors.

### **Step 3: Evaluate the risks and decide on precautions**

Decide what to do about the risks. Compare what you currently do with what is accepted as good practice. If there is a difference, list what needs to be done.

When controlling risks, apply these principles, if possible in this order:

- try a less risky option
- prevent access to the hazard
- organise work to reduce exposure to the hazard
- issue personal protective equipment
- provide welfare facilities
- involving or consulting with workers.

### **Step 4: Record your findings and implement them**

Make a record of your significant findings - the hazards, how people might be harmed by them and what you have in place to control the risks. Any record produced should be simple and focused on controls.

If you employ five or more people, the law requires you to record your findings. You can use the attached template (see Appendix 3) or download a template from the HSE website.

A health and safety checklist for classrooms can also be downloaded from the HSE website.

**Step 5: Review your risk assessment and update if necessary**

You should review what you are doing on a regular ongoing basis. When doing so, ask yourself:

- have there been any significant changes?
- are there improvements you still need to make?
- have employees or pupils spotted a problem?
- have you learnt anything from accidents or near misses?

## **Guidance on risk assessment of welfare issues**

A risk assessment in the pupil welfare context is a careful examination of what could cause harm to pupil welfare and appropriate control measures, so that you can weigh up whether the School has taken adequate precautions or should do more to prevent harm.

The purpose of a risk assessment is not to create huge amounts of paperwork, but rather to identify sensible measures to control real risks - those that are most likely to occur and /or will cause the most harm if they do.

When thinking about your risk assessment in this context, remember:

- a welfare issue is anything that may harm a pupil, to include cyber-bullying or abuse
- the risk is the chance that a pupil could be harmed, together with an indication of how serious the harm could be if they are.

### **Step 1: Identify the issue**

First you need to work out how pupils could be harmed. This will generally be set out in the concern raised about a pupil's welfare.

### **Step 2: Decide who might be harmed and how**

Identify individual pupils or groups who might be harmed and how they might be harmed by the concern raised.

### **Step 3: Evaluate the risks and decide on precautions**

Decide what to do about the risks.

Compare what you currently do with what is required by law, DfE guidance or is accepted good practice. If there is a difference, list what needs to be done to protect the pupil's welfare.

### **Step 4: Record your findings and implement them**

Make a written record of your significant findings - the issue, how pupil(s) might be harmed and what arrangements the School has in place to control those risks.

There is no prescribed format for this record but any record produced should be simple and focussed on control measures and the steps the School proposes to take to manage the risk.

### **Step 5: Review your risk assessment and update if necessary**

Review what you are doing for the pupils identified and across the school generally and monitor the efficacy of the measures you have put in place on a regular basis, or as required.

## **Appendix 2 Guidance on RIDDOR reporting**

The School is obliged to report certain accidents, diseases and dangerous occurrences or near misses under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (**RIDDOR**):

### **Accidents involving staff**

The School will report:

- work-related accidents resulting in death or "specified' injury" (including as a result of physical violence) must be reported immediately (major injury examples include: any loss of consciousness caused by head injury or asphyxia; amputation)
- work-related accidents which prevent the injured person from continuing with his / her normal work for more than seven days
- certain work-related diseases
- certain dangerous occurrences or near misses (reportable examples: bursting of closed pipes; electrical short circuit causing fire; accidental release of any substance that may cause injury to health).

### **Accidents involving pupils or visitors**

The School will report accidents where the pupil or visitor is killed or is taken from the scene of the accident to hospital and where the accident arises out of or in connection with a "work activity".

In determining whether the accident arose out of a "work activity", the School should consider whether the accident was caused by factors, such as:

- a failure in the way a work activity was organised e.g. inadequate supervision on an educational visit
- the way in which equipment, machinery or substances were used
- the condition, design or maintenance of the School premises.

Further guidance can be found in Incident reporting in schools (accidents, diseases and dangerous occurrences): guidance for employers (HSE, EDIS1 (revision 3), October 2013), and on the HSE website.

RIDDOR Incident Contact Centre **0345 300 9923** (opening hours Monday to Friday 8.30 am to 5 pm)

**Appendix 3 Example RA Template (also: see Evolve)**

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done

## **Appendix 4 Miscellaneous**

### **School Uniform**

The School expects pupils to wear their school uniform at all relevant times.

On grounds of health and safety, the School does not allow pupils to wear jewellery. An exception is ear-ring studs in pierced ears, which are kept on for PE, but removed for swimming.

### **School Meals**

Parents are expected to provide their children with a healthy snack for breaktime, this is limited to fruit (fruit is provided for Nursery children).

The School will normally provide facilities for pupils bringing in packed lunches and for pupils to have a hot meal through the School's catering services and will ensure that free, fresh drinking water is available. A separate ILG Catering policy applies to this area. Menus are in line with Government guidance and are healthy and balanced meals that take into consideration both Religious and dietary requirements and take into consideration pupil allergies

If pupils bring their own packed lunch, the contents should be provided in accordance with relevant government guidelines see <http://www.healthylunch.org.uk/government/>