

## Health and Safety Policy

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### Westbury House School

September 2026

Member of staff responsible:

Head: S.Nunn

Policy witnessed and signed by School Proprietor:

Mr A Mehta

A handwritten signature in black ink, appearing to read "A Mehta", is written below the name.

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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 The School aims 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 are not strictly within the remit of this policy, we recognise that it is inextricably linked with health and safety at the School.**

### **2.3 Healthy, safety and welfare will be promoted by:**

- 2.3.1 taking a proportionate and holistic approach to risk management
- 2.3.2 ensuring that the Senior Leadership Team (SLT) and those with responsibility for this area 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 Management of Health and Safety at Work Regulations 1999
  - 4.1.3 Statutory framework of the Early Years Foundation Stage (DfE, July 2026)
  - 4.1.4 Education (Independent School Standards) Regulations 2014 (as amended in 2026)
  - 4.1.5 Workplace (Health, Safety and Welfare) Regulations 1992
  - 4.1.6 Electricity at Work Regulations 1989
  - 4.1.7 Gas Safety (Installation and Use) Regulations 1998
  - 4.1.8 Health and Safety (Display Screen Equipment) Regulations 1992
  - 4.1.9 Manual Handling Operations Regulations 1992
  - 4.1.10 Control of Substances Hazardous to Health Regulations 2002 (**COSHH**)
  - 4.1.11 Control of Asbestos Regulations 2012
  - 4.1.12 Regulatory Reform (Fire Safety) Order 2005. Last updated in March 2025
  - 4.1.13 Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (**RIDDOR**)
  - 4.1.14 The Provision and Use of Work Equipment Regulations 1998 (**PUWER**)
  - 4.1.15 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). Last updated in March 2023, and the Data (Use and Access) Act 2025

- 4.2 This policy has regard to the following guidance and advice:
- 4.2.1 Keeping children safe in education (DfE, September 2026) (**KCSIE**);
  - 4.2.2 Health and safety: responsibilities and duties for schools (DfE, April 2022);
  - 4.2.3 Good estate management for schools (DfE, updated July 2026);
  - 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 School policies, procedures, documents and resource material listed below are relevant but not limited to the following:
- 4.3.1 Child protection and Safeguarding policy
  - 4.3.2 Supervision policy
  - 4.3.3 Educational visits policy
  - 4.3.4 Risk Assessment policy
  - 4.3.5 First Aid policy
  - 4.3.6 Fire Safety policy
  - 4.3.7 Emergency planning / Critical incident policy
  - 4.3.8 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 This policy can be made available in large print or other accessible formats 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. As such, oversight is provided through an annual H&S audit, which includes a tour of the School, collecting evidence and providing advice.
- 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 delegates responsibility for health and safety matters affecting staff and pupils to the Head, although this does not remove ILG's overall responsibility as employer for compliance with its statutory health and safety duties.

6.4 The Head is supported by the School's Assistant Heads and maintenance operative, the ILG Health & Safety Manager, and other members of the central operations team. The Board level Governor with responsibility for Health & Safety can be contacted on 07789 882597 or [operations@inspiredlearninggroup.co.uk](mailto:operations@inspiredlearninggroup.co.uk).

6.5 To ensure that efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

| Task                                                                                                                                                                               | Allocated to | When / frequency of review                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------------------------------------------|
| Keeping the policy up to date and compliant with the law and best practice                                                                                                         | Head         | As required, and recommended to be 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         | As required, and recommended to be at least annually |
| Ensuring that all reported breaches of this policy are recorded                                                                                                                    | Head         | 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 UK GDPR.                                             | Head         | As required, and recommended to be at least annually |
| Formal review                                                                                                                                                                      | Proprietor   | As required, and at least every 2 years              |

6.6 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:

6.6.1 co-operate with supervisors and managers on health and safety matters

6.6.2 undertake their work in accordance with training and instructions

6.6.3 not interfere with anything provided to safeguard their health and safety

6.6.4 take reasonable care of their own health and safety; and

6.6.5 report all health and safety concerns to an appropriate person (as detailed in this policy).

6.7 In addition, teachers and other staff have a common law duty to act as any prudent parent would do when in charge of pupils.

6.8 All pupils and visitors must:

- 6.8.1 co-operate on health and safety matters and in particular follow the instructions of staff in the event of an emergency
- 6.8.2 take reasonable care for their own health and safety and that of others at the School
- 6.8.3 observe standards of dress consistent with safety and / or hygiene
- 6.8.4 use and not wilfully misuse, neglect or interfere with anything provided to safeguard their health and safety; and
- 6.8.5 report all health and safety concerns to a member of staff.

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

- 7.1 The health and safety of employees, pupils and others is promoted through the systematic assessment of risks posed by the School's operation.
- 7.2 Risk assessments of the School's activities are 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 is undertaken through appropriate risk assessments which 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 such as:
  - 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 may delegate their completion to other staff within their school, including those who may have ownership of the space.
- 7.6 Any significant findings of the risk assessments, actions required and ensuring their implementation will be reported to the Head, the School's Safeguarding Governor and in some cases the ILG Health & Safety Manager.
- 7.7 Risk assessments will be reviewed annually, when the activity changes or when there has been an incident that causes for the review of the risk assessment, or where there is reason to believe that the assessment is no longer valid
- 7.8 Further guidance can be found in the Appendixes.

## **8 Risk assessment: pupil welfare**

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

8.1.1 Policies such as child protection and safeguarding, anti-bullying, behaviour and discipline, and educational visits.

8.1.2 General pupil wellbeing risk assessments

8.1.3 Individual risk assessments for any vulnerable pupils

8.1.4 Further guidance can be found in the Appendixes.

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

9.1 Employees will be consulted 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 Pupils may be consulted, where appropriate.

9.3 The curriculum and other methods are used to 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 reception area

10.4 Health and safety advice is available from ILG Health & Safety Manager, as well as the Board level Governor with responsibility for Health & Safety.

## **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 All employees receive job specific health and safety training, including risk assessment training, where appropriate.

11.4 Job specific training will be identified, arranged and monitored by the Head and the School's Assistant Heads. A wide range of 'duty of care' courses are available on Educare/Tes, which all staff can access.

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 staff files, as well as on the ILG centralised Training Matrix.

## **12 Workplace safety**

- 12.1 The school premises are kept safe, in good repair, 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 All reasonable steps will be taken 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.
- 12.3 The Head and the School's maintenance operative will arrange a regular visual survey of the School premises and the maintenance and repair of School premises and grounds. This includes matters such as tree safety and any other areas deemed 'risky'. Suitable records will be kept of such checks.
- 12.4 Effective infection control will be promoted by ensuring that the School premises are kept clean and tidy.
- 12.5 Access to particularly high risk areas and out of bounds areas of the grounds will be appropriately controlled and restricted.

## **13 Vehicles**

- 13.1 The school transport vehicles are managed by the Head and administrator, and their use conforms to the procedures and regulations set out in the School's Transport and Minibus policy and the Off-site visits and activities policy. A risk assessment is in place for driving at work.
- 13.2 Where a car park is available, staff can use this when working at the School. Neither the School nor ILG will be held responsible for any damage to private vehicles or theft of contents whilst using the car park. Any claims will need to be made through personal insurance policies.
- 13.3 For those staff whose work involves driving their own vehicles, they must include business use on their personal insurance policy.
- 13.4 Further details as per separate policies listed above.

## **14 Safe plant and equipment**

- 14.1 A safe working environment will be provided in relation to work equipment safety. In order to achieve this, the school will:
- provide work equipment that is suitable for the purpose and compliant with the requirements of the Provision and Use of Work Equipment Regulations
  - retain and make available the manufacturer's instruction manual for each item of equipment, where relevant
  - before using any item of work equipment, ensure that a risk assessment is carried out and brought to the attention of relevant employees
  - inspect all equipment at installation and prior to first use

- regularly inspect work equipment in accordance with the manufacturer's recommendations
  - maintain work equipment in accordance with the manufacturer's recommendations
  - keep records of all inspections and maintenance
  - provide adequate instruction, information and training to users to enable the work equipment to be used and maintained safely
  - provide refresher training as appropriate and as determined necessary by workplace inspections
  - use the guidelines provided through membership of CLEAPSS (where applicable), as appropriate for the task in hand
- 14.2 The Head and the School's Assistant Heads and maintenance operative are responsible for identifying all equipment / plant needing maintenance and specific insurance.
- 14.3 Effective maintenance procedures will be drawn up and implemented.
- 14.4 Any defects or problems found with plant / equipment should be reported to the Head and the School's maintenance operative, and the plant or equipment will be immediately taken out of use until it has been made safe.
- 14.5 New plant and equipment will be checked to ensure that they meet health and safety standards before it is purchased.
- 14.6 Users will be provided with suitable personal protective equipment where risks to their health and safety cannot be controlled in other ways. PPE must be used correctly, and relevant users will be provided with adequate instructions or training on their safe use.
- 15 Inspection and testing regime**
- 15.1 All equipment and systems will be inspected, tested and maintained in line with relevant guidance. This includes (but is not limited to) mains and portable electrical equipment, emergency lighting, gas appliances and fittings, local exhaust ventilation, pressure systems, oil storage systems, lifting equipment and glazing. This will be done by a competent and appropriately qualified person who has been authorised by the School, and records of inspection, maintenance and testing will be retained.
- 15.2 With regard to portable appliance testing, the school will adopt a risk-based approach. The frequency of testing will be determined by a competent person based on the type of appliance or equipment, how frequently it is used, and the environment in which it is used.
- 15.3 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.
- 15.4 The school will ensure that a risk assessment is 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 All reasonable steps will be taken 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. Risk assessments will be undertaken where required.

## **17 Manual handling**

- 17.1 The need for manual handling will be avoided where possible (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, risks will be reduced by providing training and guidance in manual handling techniques in accordance with the Manual Handling Operations Regulations.

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

- 18.1 The school has appropriate procedures in place to ensure that exposure to hazardous substances is minimised. In order to do so, risks from all substances hazardous to health will be assessed under the Control of Substances Hazardous to Health Regulations (**COSHH**) and prevented, reduced or controlled 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 Any substances that need a COSHH risk assessment will be identified and put into place.
- 18.4 Any actions identified in the risk assessments will be implemented, and relevant employees informed about the COSHH assessments.
- 18.5 Assessments are reviewed on a regular basis or when the work activity changes, whichever is soonest.
- 18.6 All relevant employees will ensure that hazardous substances are locked away after use and an up to date inventory maintained.

## **19 Asbestos**

- 19.1 The school recognises 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 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, with internal annual reviews recorded
- 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 to be disturbed unless prior agreement has been given by the Head or the School's asbestos responsible person 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 Head and the School's Assistant Head 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 Safety policy.
  - 20.2 The Head and the School's Assistant Heads are responsible for all areas of fire safety.
  - 20.3 Suitable fire risk assessments are carried out to examine and control the likelihood of a fire starting and the consequences of a fire, pursuant under the Regulatory Reform (Fire Safety) Order 2005. This includes the identification of fire hazards and people at risk and implementing control measures to remove or reduce that risk. All buildings on the site will be inspectedThe findings will be recorded and safety representatives informed of these.
  - 20.4 A Fire Risk Assessment (FRA) will be undertaken by an external specialist company 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. In between this period, the FRA will be annually reviewed by the Head or the School's maintenance operative.
  - 20.5 The findings of the FRA and any recommendations by the Fire Service will be considered and implemented as required to be compliant.

- 20.6 Escape routes are visually checked by nominated staff on a regular basis.
- 20.7 Fire doors must be kept free of obstruction and easily opened from the inside. Fire doors will be checked using the guidance from the document BB 100 Fire Risk Assessment in Educational Settings.
- 20.8 Fire extinguishers and other fire-fighting and preventing equipment (such as alarms, detectors, hydrants and blankets) are maintained and checked by an external specialist company according to manufacturer's guidance and regulations in order to ensure they are in working order.
- 20.9 Fire alarms are tested at least once per week and where applicable testing from a call point on a rotational basis, and before school starts each term.
- 20.10 A sufficient number of Fire Marshals/Wardens (or deputies in their absence) will be appointed, available on site at appropriate times, and will be appropriately trained for their role. A list of names and roles is available in the Fire Safety policy.
- 20.11 Records are maintained 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.
- 20.12 In addition to the School's procedures regarding fire, an emergency plan will be 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.
- 20.13 Nothing in this policy prevents anyone from dialling 999 in an emergency.
- 20.14 All health and safety and fire emergencies should also be reported to the ILG Health & Safety Manager, as well as the Board level Governor with responsibility for Health & Safety.
- 20.15 Where an evacuation is considered necessary, the main School fire bell will be activated, and the School's emergency routine followed.
- 20.16 The Assembly points are listed in the Fire Safety policy.
- 20.17 Emergency evacuation and fire drills will be tested at least once per term and the results recorded (including boarding if applicable).

## **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 The Head and the School's Assistant Heads are responsible for ensuring that the first aid and medical arrangements are suitable for the age range and number of pupils in the school.
- 21.3 They 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.
- 21.4 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.

- 21.5 Details of the appointed first aiders, location of first aid boxes and accident books where used are included in the First Aid policy.
- 21.6 Accidents and any trends are reviewed by the SLT on a regular basis (at least termly), with any recommendations or actions identified and implemented.
- 21.7 Reasonable care will be taken to ensure that the health of 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.
- 21.8 All work-related ill health including work-related stress should be reported to the Head and the School's Assistant Heads.

## **22 General environment**

### **22.1 Window restrictors**

22.1.1 The fitting and use of window restrictors within the school premises is used to ensure the safety and security of pupils, staff and visitors. The school is particularly concerned with preventing persons from falling from height, and has fitted window restrictors to remove the possibility of persons opening a gap large enough for a person to fall through. All windows from the 1<sup>st</sup> floor up will be fitted with some type of window restrictors leaving the window to open no more than 10cm.

22.1.2 It is essential that all window restrictors are maintained in a good working order, and that any defects are reported to the responsible person as a matter of urgency.

22.1.3 The school will ensure that:

- a risk assessment is carried out to assess the danger of falling from any window and the effects of installing a window restrictor, including the possible loss of ventilation
- all vulnerable parties who may be particularly at risk from falling out of windows are identified
- all window restrictors are secured with tamper-proof fittings
- the window frames are sufficiently robust where the window requires a window restrictor
- all window restrictors are properly maintained and kept in working order

A designated person is responsible for checking the window restrictors on a regular basis. Any window restrictor that is found to be broken will be replaced or repaired as a matter of urgency, but the window must be kept locked shut until repairs are carried out. If the repair will not take place for more than a day, temporary signage will also be put in place to indicate that the window should not be used.

### **22.2 Outdoor and peripatetic working**

22.2.1 The school will ensure, so far as is reasonably practicable, that those who work outdoors or away from their normal base are not put at any additional risk to their health and safety.

22.2.2 The school will ensure that:

- where work is being undertaken on a site under the control of another party, risk assessments are reviewed, and appropriate safe systems of work are established
- outdoor activities are planned and risk assessed prior to undertaking the work. This will include visiting of the site(s) to identify potential hazards
- suitable personal protective clothing is made available to staff either from the school or from the third party in control of the site
- suitable arrangements are in place for emergencies, including adequate first aid.

22.2.3 Those working outdoors, or away from base, are responsible for ensuring that:

- if working on a third party site, they report to a responsible person to ensure familiarisation with safety precautions relating to the particular site
- they report any problems or shortcomings to their manager or supervisor as soon as possible. If, during work, the conditions change or any aspect of the task changes in such a way to increase the risk, work should stop, unless doing so presents a greater risk
- the appropriate personal protective equipment provided is worn correctly and when required to do so. Any defects must be reported to their manager or supervisor
- they are familiar with the emergency arrangements and that these are in place prior to starting work
- any accidents and incidents are reported to their manager and in line with any local arrangements for the site

**22.3 Vibration**

22.3.1 Regular exposure to continuous vibration from a work process has the potential to cause long term ill health, including a range of occupational diseases collectively known as hand-arm vibration syndrome (HAVS) or whole body vibration (WBV).

22.3.2 To minimise the risk from vibration the school will:

- assess the risks to health from exposure to continuous levels of vibration and determine the control measures needed
- introduce effective control measures to ensure levels of exposure to hand-arm vibration and whole body vibration are eliminated or reduced as far as is reasonably practicable
- record the assessments and review them periodically or when changes occur
- ensure that the most appropriate equipment is used for the job, that the equipment is sourced from appropriate suppliers and that it bears the “CE” certification mark

- ensure that those persons responsible for managing work likely to result in exposure to hand arm vibration and whole body vibration are adequately trained and competent
- inform, instruct and train employees about the risks and the precautions to be taken to protect themselves from the harmful effects of continuous exposure to vibration
- ensure no new equipment or processes are introduced into the work activities where there is a foreseeable risk of hand-arm or whole body vibration without a risk assessment and approval of a designated manager
- maintain an inventory of all vibration equipment used that is likely to cause hand-arm vibration and whole body vibration
- monitor exposure of hand-arm vibration and whole body vibration and undertake appropriate health surveillance, where necessary
- maintain tools to the manufacturer's specifications to avoid worsening vibration

## **23 Disabled persons**

### **23.1.1 The school will:**

- treat all disabled persons with respect and dignity, both in the provision of a safe working environment and in equal access to the facilities (also refer to the Accessibility Plan)
- give full and proper consideration to the needs of any disabled pupils, staff and visitors
- carry out a risk assessment in line with the disabled person's special needs, and make any reasonable adjustments to the premises and/or employment arrangements
- encourage staff with special needs to suggest any premises or task improvements to their line managers
- in an emergency evacuation, ensure that suitable plans are in place which will assist disabled persons to leave the premises safely and swiftly (using the PEEP templates)

## **24 Hirers, visitors, and contractors**

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

#### **24.1.1 observe the rules of the School**

#### **24.1.2 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**

- 24.1.3 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.
- 24.2 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.
- 24.3 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).
- 24.4 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.
- 24.5 The School will ensure that all contractors are fully briefed on the safety aspects of the job in question and satisfactorily supervised. Contractors are required to provide their own risk assessments and method statements for any works prior to commencement.
- 24.6 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.
- 24.7 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 FEEP should be provided.
- 24.8 A hot works permit must be used if applicable, issued by the designated site safety person and only once all the necessary risk assessments and precautions are in place
- 25 Security**
- 25.1 We aim to provide a safe and secure environment for all employees, pupils, and other visitors to the School premises.
- 25.2 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.
- 25.3 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:
- 25.3.1 there are sufficient security arrangements in place to protect the security of the premises and persons on it
- 25.3.2 security assessments are conducted and reviewed regularly

- 25.3.3 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
- 25.3.4 visitors to the premises are appropriately identified
- 25.3.5 there are adequate supervision arrangements in place
- 25.3.6 all security breaches or incidents are reported to ILG and / or to the police or other emergency services as appropriate
- 25.3.7 security measures do not compromise or intrude on the reasonable privacy of employees and pupils.

## **26 Protection from violence and harassment**

- 26.1 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.
- 26.2 Incidents or acts of violence or harassment by pupils will also be dealt with in accordance with the School's behaviour policy or other relevant procedures.
- 26.3 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.
- 26.4 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.

## **27 Lone workers**

- 27.1 The School recognises the additional risks that may arise from lone working. For the purpose of this policy, a lone worker is an employee who works by themselves without close or direct supervision or contact with other School staff. Lone working may include working on the School premises outside normal operating hours, working in isolated areas of the site, travelling or working away from the School, or undertaking home or other off-site visits.
- 27.2 Work activities involving lone working will be appropriately risk assessed. The assessment will take account of the nature of the work, the location and environment, access and security arrangements, the risk of violence or aggression, the individual's experience and training, any relevant medical or personal factors, and the arrangements for responding to an accident, illness or other emergency.
- 27.3 Appropriate control measures will be implemented according to the level of risk. These may include:
  - arrangements for informing another member of staff when and where lone working will take place;
  - agreed methods and frequency of communication or check-in arrangements;
  - access to a telephone, radio, lone-worker device or other suitable means of summoning assistance;
  - arrangements for entering, securing and leaving the premises safely;
  - appropriate information, instruction, training and supervision; and

- clear procedures for raising an alarm and responding where contact with a lone worker cannot be established.
- 27.4 Certain higher-risk activities may not be undertaken by a lone worker where the risk assessment determines that the activity requires the presence of another suitably competent person. Staff must not undertake lone working where they have been advised that it is unsafe to do so.
- 27.5 Lone workers are responsible for following the agreed safe working arrangements, maintaining agreed contact with the School and reporting any concerns, incidents, near misses or changes in circumstances which may affect the safety of the lone-working arrangements.
- 27.6 Lone-working arrangements and risk assessments will be reviewed following any significant change, accident, incident or near miss, or where there is reason to believe that the existing arrangements may no longer be effective.
- 28 Training**
- 28.1 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.
- 28.2 The level and frequency of training depends on the role of the individual member of staff.
- 28.3 The School maintains written records of all staff training.
- 29 Reporting requirements and record keeping**
- 29.1 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). HSE telephone reporting is available for fatal accidents or specified injuries to workers on 0345 3009923. Further guidance in relation to RIDDOR reporting can be found on the HSE website and in Appendix 2. All suspected RIDDOR incidents must be referred to the Board level lead for Health & Safety. Where needed, an internal investigation may be carried out to ensure all evidence is available and recorded. Once confirmed, the report must be submitted by the Director of Finance and Operations within 10 days of the incident (or 15 days if an employee falls ill due to an incident). All RIDDOR reports must also be sent to the Board level lead for Health & Safety for reporting to insurers.
- 29.2 The Head and the School's Assistant Heads are responsible for ensuring that the School complies with its reporting and record keeping obligations.
- 29.3 They are responsible for reporting any accidents or incidents that meet the threshold to the HSE or enforcing authority, as set out in Appendix 2.
- 29.4 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), 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>.

- 29.5 The School may refer to ILG when considering whether the accident or incident is reportable to any other regulatory body or organisation.
- 29.6 The School will notify the ILG Health & Safety Manager and the Board Level Governor for Safeguarding and Health & Safety and the 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.
- 29.7 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.
- 29.8 Following an incident or accident the School will take all reasonable steps to collect and preserve relevant evidence and documentation.
- 29.9 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.
- 29.10 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:
- 29.10.1 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
- 29.10.2 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.
- 29.11 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.
- 29.12 Where there are specific record keeping requirements under this policy, these are set out below:
- 29.12.1 all reported breaches of this policy will be recorded and this record will be reviewed annually by the Head
- 29.13 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.
- 30 Monitoring and internal investigation**
- 30.1 Health and safety is monitored both actively and reactively. The Proprietor accepts overall responsibility for monitoring health and safety performance and for ensuring that the School meets the required health and safety standards.

- 30.2 At an operational level, the Head and the School's Assistant Heads are 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.
- 30.3 The School will investigate any significant accidents, incidents and work-related causes of sickness absences, if required, and pass this information onto the Board Level Governor with responsibility for Health & Safety. They may also seek support from the ILG Health & Safety Manager and/or a member of the HR team. 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 ILG Head of Operations.
- 30.4 The School will not sanction any internal investigation which may prejudice the investigations of outside agencies.
- 30.5 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.
- 30.6 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.

### 31 Version control

|                                     |                |
|-------------------------------------|----------------|
| Date of adoption of this policy     | May 2024       |
| Date of last review of this policy  | September 2026 |
| Date for next review of this policy | Autumn 2027    |
| Policy owner (School)               | Head           |

## **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:

- remove the risk entirely wherever this is reasonably practicable
- try a less risky activity, substance, equipment or process option
- prevent access to the hazard by physically isolating people from the risks
- organise work to reduce exposure to the hazard eg. supervision, training etc.
- issue personal protective equipment when risks cannot be adequately controlled
- provide welfare facilities
- involve or consult with workers.

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

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

As the School employs five or more people, the law requires that findings are recorded. The attached template can be used, or a template downloaded from the HSE website. With the

introduction of Smartlog from April 2026, the system should be used for creating, storing and updating all risk assessments.

A health and safety checklist for classrooms can also be downloaded from the HSE website, to be created, stored and updated on Smartlog

**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 pupil 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. These types of risk assessments would normally be done by the DSL, and if they contain confidential information they may not be stored on Smartlog, or access will be restricted.

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 their 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).

### Specified injuries for accidents involving staff and pupils which must be reported include the following

- fractures (other than to fingers, thumbs, and toes)
- amputation of an arm, hand, finger, thumb, leg, foot or toe
- any injury likely to cause permanent blinding or reduction in sight in one or both eyes
- any crush injury to the head or torso causing damage to the brain or internal organs in the chest or abdomen
- serious burns (including scalding) which:
  - cover more than 10% of the body
  - cause significant damage to the eyes, respiratory system, or other vital organs
- any scalping requiring hospital treatment
- any loss of consciousness caused by head injury or asphyxia
- any other injury arising from working in an enclosed space which:
  - leads to hypothermia or heat-induced illness
  - requires resuscitation or admittance to hospital for more than 24 hours

**NOTE:** Many incidents that happen in schools or on school trips won't be RIDDOR reportable, but it's important to consider this, and record and report cases as required. Accidents involving visitors or other non-workers may be reportable. Seek guidance as outlined below.

Further HSE guidance can be found on <https://www.hse.gov.uk/riddor/specified-injuries.htm> and forms can be found on <https://www.hse.gov.uk/riddor/report.htm>

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

### **Accidents involving pupils, staff 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.

### Appendix 3 Example Risk Assessment Template and Risk Matrix

| 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 |
|-----------------------|------------------------------|-----------------------------|-----------------------------------|-----------------|-----------------|------|
|                       |                              |                             |                                   |                 |                 |      |
|                       |                              |                             |                                   |                 |                 |      |

It is important to note the Likelihood (level of probability) that the risk will occur or be realised and the Impact (level of severity) that the risk will have if realised. A risk matrix can be used for this purpose, particularly taking into account the control measures already in place. This template can be used to calculate the level of risk by finding the intersection between the likelihood and the consequences/severity. Once the further actions have been completed, risks can be reduced in each area.

| Likelihood     | Consequence   |        |          |         |         |
|----------------|---------------|--------|----------|---------|---------|
|                | Insignificant | Minor  | Moderate | Major   | Severe  |
| Almost Certain | Medium        | High   | Extreme  | Extreme | Extreme |
| Likely         | Medium        | Medium | High     | Extreme | Extreme |
| Possible       | Low           | Medium | Medium   | High    | Extreme |
| Unlikely       | Low           | Low    | Medium   | Medium  | High    |
| Rare           | Low           | Low    | Low      | Medium  | Medium  |

## **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 usually 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**

The School will provide facilities 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.