

# Health and Safety Policy

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**Westbury House School**

September 2024

Member of staff responsible:

Head:

A handwritten signature in black ink, consisting of a large, stylized letter 'a' followed by a horizontal line that tapers to the right.

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.
- 3.3 Any specific arrangements for boarders (both pupils and staff living on site) are covered within the Boarding Handbook.

### **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, December 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. Last updated in Oct 2023.
  - 4.1.12 Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (**RIDDOR**)
  - 4.1.13 Data Protection Act 2018 and UK General Data Protection Regulation (UK 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);
  - 4.2.2 Keeping children safe in education (DfE, September 2024) (**KCSIE**);
  - 4.2.3 Health and safety: responsibilities and duties for schools (DfE, April 2022);
  - 4.2.4 Good estate management for schools (DfE, April 2022);
  - 4.2.5 Incident reporting in schools (accidents, diseases, and dangerous occurrences): guidance for employers (Health and Safety Executive (HSE) EDIS1 (revision 3), October 2013); and
  - 4.2.6 Using contractors: a brief guide (HSE, INDG368 (revision 1), June 2012).
  - 4.2.7 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 (risk assessment) policy
  - 4.3.4 First Aid policy
  - 4.3.5 Fire Safety policy
  - 4.3.6 Emergency planning / Critical incident policy
  - 4.3.7 School rules ('The Westbury Way')

## 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 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 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.
- 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	Health & Safety Officer	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	Health & Safety Officer	As required, and recommended to be at least annually
Reporting any policy amendments to the Proprietor	Health & Safety Officer	As required, and recommended to be at least annually
Ensuring that all reported breaches of this policy are recorded	Health & 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 UK GDPR.	Health & Safety Officer	As required, and recommended to be at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Health & Safety Officer	As required, and recommended to be at least annually
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 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 the Health & Safety Officer or other members of staff who have ownership of the space.
- 7.6 The findings of the risk assessments, actions required and ensuring their implementation will be reported to the Head.
- 7.7 Risk assessments will be reviewed annually or when the activity changes, whichever is soonest.
- 7.8 Further guidance can be found in Appendix 1.

## 8 **Risk assessment: pupil and staff 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, educational visits.

8.1.2 Risk assessment: pupil welfare policy

8.1.3 Individual risk assessments for any vulnerable pupils

8.1.4 Staff wellbeing policy

8.1.5 Further guidance can be found in 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 Staff Room

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 School Entrance area.

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 identified, arranged and monitored by the Health & Safety Officer. 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 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 Head & Health & Safety Officer 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 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 **Vehicles**

- 13.1 The school transport vehicles are managed by the Transport manager, 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.

## 14 **Safe plant and equipment**

- 14.1 The Health & Safety Officer is responsible for identifying all equipment / plant needing maintenance and specific insurance.
- 14.2 They are 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 Health & Safety Officer and the plant or equipment should be immediately taken out of use until it has been made safe.
- 14.4 The Head will check that new plant and equipment meets health and safety standards before it is purchased.
- 14.5 The Head will ensure that employees are provided with suitable personal protective equipment where risks to their health and safety cannot be controlled in other ways. They will ensure that any PPE is used correctly, and that relevant employees are provided with adequate instructions or training on their safe use.

## 15 **Inspection and testing regime**

- 15.1 The Health & Safety Officer 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, they 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 They 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 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 The school has 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 Health & Safety Officer is responsible for identifying all substances which need a COSHH assessment, and ensuring that these are in place.

18.4 They will ensure that all actions identified in the assessments are implemented, and that all relevant employees are 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 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 the Head 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 Health & Safety Officer 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 Health & Safety Officer is 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 to 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. The 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 School.
- 20.5 The findings of the FRA and any recommendations by the Fire Service will be considered and implemented as required. Escape routes are visually checked by nominated staff on a regular basis. Fire doors must be kept free of obstruction and easily opened from the inside.
- 20.6 Fire extinguishers and other fire-fighting equipment (such as alarms, detectors and blankets) are maintained and checked by an external specialist company in order to ensure they are in working order.
- 20.7 Fire alarms are tested at least once per week on a rotational basis, and before school starts each term.
- 20.8 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.
- 20.9 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.
- 20.10 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 (FEPP) and brief instructions for visitors are available at the School 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 the 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 listed in the Fire Safety policy.
- 20.15 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 Health & Safety Officer is 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 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.
- 21.8 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 or other relevant procedures.
- 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 Health & Safety Officer is responsible for ensuring that the School complies with its reporting and record keeping obligations.
- 27.3 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.
- 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 The School may refer to ILG when considering whether the accident or incident is reportable to any other regulatory body or organisation.
- 27.6 The School will notify the Board Level Lead 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.
- 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 accepts 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 Health & Safety Officer 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 is responsible for investigating any significant 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 ILG 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 2024
Date for next review of this policy	Autumn 2025
Policy owner (School)	Health & Safety Officer

## **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 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.

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).

### 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. 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.